FALCON SC TAX INTELLIGENCE

Falcon Sample Report Catalogue

Twenty worked reports across the service portfolio

Version 1 | 3 October 2026 | English edition

This suite gives Falcon staff concrete examples of professional service delivery beyond transfer pricing. Each report contains a fictional engagement, an executive assessment, a tailored scope and method, three substantive findings, a transparent calculation schedule, alternatives, a delivery plan and technical review requirements.

Use the presentation PDFs to inspect the finished layout and the Word documents to adapt the structure. All figures and evidence are fictional; the suite demonstrates report quality and judgement boundaries rather than certifying tax outcomes. It does not claim to exhaust every possible bespoke advisory assignment.

Transfer pricing and dispute reports

Code	Report	Primary use
01	Transfer Pricing Local File	Transfer pricing
02	Transfer Pricing Master File	Transfer pricing
03	Country by Country Reporting Readiness	Transfer pricing
04	SP2DK Response and Evidence Report	Tax dispute
05	Tax Audit Defence Report	Tax dispute
06	Objection and Appeal Strategy Report	Tax dispute
07	MAP and APA Feasibility Report	International dispute prevention

Each individual report has six pages. The full portfolio PDF contains this catalogue followed by all twenty reports, with bookmarks for direct navigation. The ZIP contains individual PDFs and editable Word documents using the same numbered filenames.

Compliance and advisory reports

Code	Report	Primary use
08	Monthly Tax Care Report	Compliance retainer
09	Tax Health Check Report	Tax health check
10	VAT Reconciliation and Refund Readiness	VAT and refund
11	Payroll and Expatriate Tax Review	Payroll and expatriate
12	Mergers and Acquisitions Tax Due Diligence	M and A due diligence
13	International Structuring Advisory	International advisory
14	Tax Incentive Feasibility Report	Incentives
15	Customs and Trade Tax Review	Customs and trade
16	Global Minimum Tax Readiness	Minimum tax applicability
17	Tax Cash Flow Planning Report	Cash flow planning
18	Tax Technology and Controls Roadmap	Tax technology
19	Annual Corporate Income Tax Review	Corporate income tax compliance
20	Withholding Tax Reconciliation Report	Withholding tax compliance

The suite covers the service names already present in Pajak365, including Tax Care, Tax Health Check, VAT and Refund, Payroll and Expatriate, M and A Due Diligence, International Advisory and Tax Technology. Incentives, Customs and Trade, Minimum Tax and Cash Flow Planning extend the advisory scenario catalogue.

How to adapt a report for a real client

Start with the engagement purpose

Select the report whose decision and service scope match the authorised work. Replace the fictional entity, period and fact pattern; do not simply change the name on the cover. Reconcile the report scope to the quotation, engagement letter and actual deliverables. A report model does not confer an additional regulated or professional capability.

Build the evidence before the conclusion

Replace every E reference with an actual original and a stable index. Keep the distinction between facts, client assertions, calculations, assumptions and legal interpretation. The worked scenarios intentionally contain unresolved issues so that staff can practise a balanced recommendation rather than a prematurely confident conclusion.

Complete the technical work

Verify the current original law, amendments, treaty and period applicability. The reference lists are research starting points. Numerical rates in the annual tax, withholding, customs, incentive and minimum-tax scenarios are explicit modelling assumptions; they must not be reused as prescribed client rates. Obtain licensed comparables and actual screening evidence for transfer pricing.

Use AI within the existing workflow

AI may help organise supported facts and prepare an internal draft within an enabled route. Interpretation uses the dedicated workflow and applicable qualification controls. Template quality does not qualify a model, resolve a source gap or replace independent Falcon judgement. Preserve review notes and current source versions, and monitor cost and blocked-call states.

Issue only after professional review

Obtain independent review by a suitably qualified professional, confirm client authority and remove fictional material. Review any Bahasa Indonesia version substantively before statutory use. These English reports are management-oriented sample deliverables; the dispute report is a strategy report and is not an objection petition or appeal filing.

Design and quality standard

A consistent professional system

The suite uses a restrained Falcon identity, generous margins, readable body text, clear black headings and navy financial tables with alternating pale rows. Every report follows the same navigation rhythm while its analysis remains specific to the service. Pagination, repeatable table headers and numerical alignment keep long reports readable in print and on screen.

Broader engagement variants

Service family	Variants to tailor from the worked model
Transfer pricing	Goods, services, financing, royalties, restructuring and intangible contribution analysis
Disputes	SP2DK response, audit defence, objection, appeal and further-remedy assessment; actual pleadings need separate counsel review
International	Bilateral adjustment relief, prospective APA, treaty and operating-model advice
Compliance	Monthly retainer, annual corporate computation, withholding, payroll and VAT completion
Advisory	Acquisition and disposal, incentive eligibility, customs review, minimum tax, cash planning and data controls

What completion means

A finished report should explain the client's decision, substantiate the findings, reperform the numbers and state the conditions that could change the recommendation. Design cannot compensate for missing evidence. The final file must have an approved audience, source version, reviewer and issue record; external submission and receipt remain separate events.

Suggested staff exercise

Choose a service, challenge one unsupported assertion, reperform a financial bridge and identify the evidence that would change the conclusion. Then adapt the findings and delivery plan to a supervised fictional case. Staff should be able to explain the limits of the report before using its structure with real client material.

TRANSFER PRICING

Transfer Pricing Local File

PT Contoh Distribusi Nusantara

FY2025 | Prepared for the fictional management team | 3 October 2026

Executive assessment

Complete the segmentation and functional evidence before adopting a tested margin or an arm's length conclusion. The sample distributor earns a positive accounting margin, but its service costs and actual control of commercial risks remain unresolved.

The fictional distributor purchases goods from a related regional principal and sells to independent Indonesian customers. Management describes the entity as routine, although local staff negotiate discounts and maintain inventory. Recorded sales are IDR 120,000 million; cost of goods sold is 96,000 million and operating expenses are 18,000 million. A 3,000 million regional service charge is included in expenses.

Priority	Matter requiring a decision	Current evidence position
High	Risk control needs corroboration	Open for professional review
High	Service cost affects the segment	Open for professional review
High	Benchmark remains unperformed	Open for professional review

This is a worked sample, not an issued client opinion. All companies, transactions, evidence records and calculations are fictional. The recommended actions demonstrate professional delivery; they do not establish a tax liability, filing eligibility, benchmark or regulatory approval.

Scope and analytical method

Purpose and intended use

The purpose is to help the fictional management team understand the evidence, the decision still required and the work needed to complete a defensible deliverable. The report is intended for internal discussion with the responsible Falcon professional. It is not a filing, an audit opinion or a guarantee of an authority outcome.

Work performed in the illustrative case

- Controlled goods purchases and regional services
- Entity and transaction delineation
- Functional interviews and segmented operating accounts
- Method selection and comparable search design

Reconcile the transaction population to statutory accounts, interview sales and finance personnel, trace discount approvals and losses, and assess the availability of reliable internal uncontrolled transactions. Consider TNMM only after testing functional comparability and the quality of the segment. Reject methods with reasons tied to the transaction, not convenience.

Evidence population

Ref	Illustrative record	Role in the analysis
E01	Segment trial balance and statutory bridge	Starting population and primary bridge
E02	Related-party purchase and distribution agreements	Classification and factual support
E03	Functional interview record and discount approval log	Exception or corroboration testing
E04	Regional service allocation and deliverables	Decision history and completion support

The references are report-local training identifiers. They are not verified originals, app record IDs or hashes. No real client files were inspected. A live engagement must preserve the actual originals, their versions and the reviewer's assessment of each material claim. The descriptions above define the evidence that the case assumes or explicitly identifies as missing.

Coverage and limitations

Only the stated sample scope is covered. The report does not infer completeness of other entities, years, transactions or tax types. Where the record is incomplete, the analysis identifies the limitation rather than treating management's explanation as verified evidence. Any estimate remains subject to factual validation, current legal applicability and independent review.

Detailed findings and professional response

Priority is a qualitative judgement about the importance of resolving an issue before delivery. High means that the matter could change a material conclusion or prevent completion. Medium means that a control or corroboration improvement is required. These labels are not a probability of assessment or a calculated tax exposure.

Finding 1 Risk control needs corroboration

High priority. E02 assigns pricing discretion to the regional principal, while E03 describes local approval of exceptional discounts. The sample does not resolve who sets the commercial policy or bears the economic consequence.

Professional implication. A routine label is insufficient to identify the party controlling market and inventory risk.

Recommended response. Obtain approval logs, inventory write-offs and decision records. Compare contractual terms with actual conduct before determining the tested party.

Finding 2 Service cost affects the segment

High priority. The 3,000 million charge in E01 has an invoice and allocation spreadsheet in E04, but no complete delivery evidence.

Professional implication. The reported margin changes materially if the charge is incorrectly classified or attributable to a different segment. A sensitivity is not a deductibility conclusion.

Recommended response. Trace deliverables, recipients and the allocation key. Reconcile benefit evidence and classification without removing the charge merely to reach a target margin.

Finding 3 Benchmark remains unperformed

High priority. No licensed database export, search date, screening log or accepted comparable set is included.

Professional implication. Neither a sample range nor the positive result establishes compliance with the arm's length principle.

Recommended response. Approve a search strategy, preserve all screening decisions and test adjustments. Obtain independent review of the final method and range.

Counteranalysis and judgement

An incomplete record is not proof that the taxpayer's position is wrong. Equally, an invoice, signed agreement or plausible narrative does not establish every factual or legal element. The reviewer should test alternative explanations and record what evidence would change the assessment. Preserve both supportive and adverse material so that the final conclusion remains balanced.

Financial analysis and decision alternatives

The schedule below makes the numerical reasoning reproducible. All inputs are fictional. The calculation basis states whether a value comes from the assumed record, a formula or an explicit scenario parameter. Figures should not be copied into a live return or used as a benchmark.

Measure	Illustrative result	Calculation basis
Revenue	120,000	E01
Cost of goods sold	96,000	E01
Gross profit	24,000	120,000 minus 96,000
Operating expenses	18,000	E01
Operating profit	6,000	24,000 minus 18,000
Operating margin on sales	5.00%	6,000 divided by 120,000

Amounts are IDR million. Excluding the service charge solely for sensitivity increases operating profit to 9,000 million and margin to 7.50%. The 2.50 percentage point difference isolates the accounting sensitivity; it is not a permitted tax adjustment. No illustrative quartiles are supplied because a fabricated comparable range would obscure the principal evidence gap.

Alternatives for management discussion

Alternative	Practical rationale	Condition before adoption
Preserve booked charge	Keeps the ledger intact	Requires service and allocation verification
Correct evidenced classification	Aligns the segment to actual costs	Requires a documented accounting basis
Perform a new benchmark	Tests the selected pricing method	Requires licensed data and screening review

Management should compare the alternatives using verified facts, operational feasibility and the applicable legal analysis. A more favourable numerical scenario is not evidence that its assumptions are valid. The report therefore recommends completing the unresolved work before selecting a final tax position or an external action.

Recommendations and delivery plan

The following sequence is an illustrative internal work plan measured from engagement kick-off. It is not a statutory timetable. Any external response or filing date must be verified separately and may require faster escalation. The engagement partner remains responsible for the scope and resources agreed with the client.

Work step	Responsible role	Indicative timing	Completion evidence
Confirm scope and procedural facts	Engagement lead	Days 1 to 2	Approved scope and verified external date where relevant
Resolve finding 1	Client finance and Falcon adviser	Days 2 to 5	Original evidence and documented resolution or scope limitation
Resolve finding 2	Technical workstream lead	Days 3 to 7	Originals and approved technical treatment
Resolve finding 3	Client owner and Falcon adviser	Days 3 to 8	Reviewed action and completion evidence
Review analysis and computations	Independent Falcon partner	After evidence closure	Documented challenge and approved current version
Authorise delivery and preserve receipts	Engagement lead and client signatory	After professional approval	Final report version and any external acknowledgement

Escalation and change control

Escalate immediately if an actual external date is near, an original contradicts the working facts, the legal framework changes, or the proposed action exceeds the authorised scope. New evidence can change the recommendation. Update the affected calculations, issue analysis and report version, and obtain fresh independent review where the conclusion has changed.

Client communication

Tell the client what is established, what remains uncertain and what they must supply or decide. Explain how missing evidence limits the deliverable. Obtain approval of the final audience and language. Preserve the distinction between internal review, client delivery and authority acceptance.

Technical references and completion record

The official references below were located on 3 October 2026. They are starting points for a real technical review, not a representation that every operative article, amendment, treaty or transitional provision has been checked. No quoted legal passage or current statutory rate is relied on to decide this fictional case.

Indonesian related party transactions

PMK 172 of 2023 - Review the applicable articles, period, documentation, MAP and APA provisions and any subsequent changes.

Open official reference

Transfer pricing analytical framework

OECD Transfer Pricing Guidelines 2022 - Analytical guidance is not a substitute for Indonesian law, treaty text or later relevant guidance.

Open official reference

Required legal applicability record

For each material position, retain the original provision and exact article, authority and version, effective dates, relevant amendments and the reason it applies to the client's facts and period. Record competing interpretations and the specialist's conclusion. Official service pages and OECD guidance have different authority from domestic legislation and treaty text.

Independent completion checks

- The client identity, period and authorised scope match the actual engagement.
- Every material statement is traceable to the original record and preserves any contradiction.
- The calculations are independently reperformed and assumptions are distinguished from legal rules.
- The applicable law and source history support the conclusion for the actual period.
- A different qualified Falcon reviewer records the judgement and material limitations.
- The client authorises the intended delivery and any separate external submission is evidenced.

Sample status: not approved for client issue. No preparer, reviewer or client signature is simulated. Replace the fictional dataset and complete the real engagement review before using this document as a delivery model.

TRANSFER PRICING

Transfer Pricing Master File

Contoh Regional Consumer Group

FY2025 | Prepared for the fictional management team | 3 October 2026

Executive assessment

Reconcile the group value chain to actual decision-making and legal ownership before issuing a Master File. The fictional group narrative is coherent at a high level, but it does not yet explain the contribution of the Indonesian entity to product development and procurement.

The sample group operates through a regional holding company and entities in three jurisdictions. Consolidated external revenue is IDR 1,000,000 million. Intercompany sales of 120,000 million are eliminated. Group management locates trademarks in a holding entity, while development staff, marketing budgets and product decisions sit in operating companies.

Priority	Matter requiring a decision	Current evidence position
High	Intangible ownership and contribution differ	Open for professional review
Medium	Treasury narrative is incomplete	Open for professional review
Medium	Consolidation bridge requires sign-off	Open for professional review

This is a worked sample, not an issued client opinion. All companies, transactions, evidence records and calculations are fictional. The recommended actions demonstrate professional delivery; they do not establish a tax liability, filing eligibility, benchmark or regulatory approval.

Scope and analytical method

Purpose and intended use

The purpose is to help the fictional management team understand the evidence, the decision still required and the work needed to complete a defensible deliverable. The report is intended for internal discussion with the responsible Falcon professional. It is not a filing, an audit opinion or a guarantee of an authority outcome.

Work performed in the illustrative case

- Group organisation and ownership
- Business lines and value creation
- Intangibles and financing arrangements
- Group financial and tax arrangements

Map legal entities to operating functions, trace product and market decisions to named roles, and reconcile internal management reporting to consolidated accounts. Compare legal rights over intangibles with the activities that develop, enhance, maintain, protect and exploit them. This functional map supports local analysis but does not allocate profit automatically.

Evidence population

Ref	Illustrative record	Role in the analysis
E01	Consolidated accounts and elimination schedule	Starting population and primary bridge
E02	Ownership chart and intellectual property register	Classification and factual support
E03	Product and marketing decision records	Exception or corroboration testing
E04	Treasury agreements and financing balances	Decision history and completion support

The references are report-local training identifiers. They are not verified originals, app record IDs or hashes. No real client files were inspected. A live engagement must preserve the actual originals, their versions and the reviewer's assessment of each material claim. The descriptions above define the evidence that the case assumes or explicitly identifies as missing.

Coverage and limitations

Only the stated sample scope is covered. The report does not infer completeness of other entities, years, transactions or tax types. Where the record is incomplete, the analysis identifies the limitation rather than treating management's explanation as verified evidence. Any estimate remains subject to factual validation, current legal applicability and independent review.

Detailed findings and professional response

Priority is a qualitative judgement about the importance of resolving an issue before delivery. High means that the matter could change a material conclusion or prevent completion. Medium means that a control or corroboration improvement is required. These labels are not a probability of assessment or a calculated tax exposure.

Finding 1 Intangible ownership and contribution differ

High priority. E02 records legal trademark ownership in the holding entity. E03 places product design and marketing approval in two operating entities.

Professional implication. A description based only on registration would omit economically important contributions.

Recommended response. Prepare an activity and decision map with budgets, personnel and approvals. Explain remuneration separately from legal ownership.

Finding 2 Treasury narrative is incomplete

Medium priority. E04 identifies a cash pool, but no records establish guarantees, credit decisions or the treatment of deposits.

Professional implication. The group financing overview cannot explain participant benefits and risk allocation with sufficient specificity.

Recommended response. Obtain cash-pool agreements, balances, guarantee terms and treasury approval records. Distinguish arrangements from proposed tax outcomes.

Finding 3 Consolidation bridge requires sign-off

Medium priority. The management roll-up in E01 totals 1,120,000 million before elimination of 120,000 million.

Professional implication. Confusing pre-elimination and external revenue could create inconsistencies with local documents and jurisdiction data.

Recommended response. Tie eliminations to counterparty balances and obtain group finance approval of the financial summary.

Counteranalysis and judgement

An incomplete record is not proof that the taxpayer's position is wrong. Equally, an invoice, signed agreement or plausible narrative does not establish every factual or legal element. The reviewer should test alternative explanations and record what evidence would change the assessment. Preserve both supportive and adverse material so that the final conclusion remains balanced.

Financial analysis and decision alternatives

The schedule below makes the numerical reasoning reproducible. All inputs are fictional. The calculation basis states whether a value comes from the assumed record, a formula or an explicit scenario parameter. Figures should not be copied into a live return or used as a benchmark.

Measure	Illustrative result	Calculation basis
Entity revenue before eliminations	1,120,000	E01
Intercompany eliminations	120,000	E01
Consolidated external revenue	1,000,000	1,120,000 minus 120,000
Group operating profit	80,000	E01
Group operating margin	8.00%	80,000 divided by 1,000,000

Amounts are IDR million. The elimination bridge is an accounting consistency check, not a jurisdictional profit allocation. The 8.00% group margin is unsuitable as a direct benchmark for a local distributor without transaction, functional and market analysis. Group narratives should identify changes from prior years and explain their documentary support.

Alternatives for management discussion

Alternative	Practical rationale	Condition before adoption
Update the central narrative	One consistent group explanation	Local facts must still be checked
Prepare jurisdiction annexes	Captures operational differences	Needs version control across countries
Commission intangible workstream	Investigates contribution and control	Separate specialist analysis required

Management should compare the alternatives using verified facts, operational feasibility and the applicable legal analysis. A more favourable numerical scenario is not evidence that its assumptions are valid. The report therefore recommends completing the unresolved work before selecting a final tax position or an external action.

Recommendations and delivery plan

The following sequence is an illustrative internal work plan measured from engagement kick-off. It is not a statutory timetable. Any external response or filing date must be verified separately and may require faster escalation. The engagement partner remains responsible for the scope and resources agreed with the client.

Work step	Responsible role	Indicative timing	Completion evidence
Confirm scope and procedural facts	Engagement lead	Days 1 to 2	Approved scope and verified external date where relevant
Resolve finding 1	Client finance and Falcon adviser	Days 2 to 5	Original evidence and documented resolution or scope limitation
Resolve finding 2	Technical workstream lead	Days 3 to 7	Originals and approved technical treatment
Resolve finding 3	Client owner and Falcon adviser	Days 3 to 8	Reviewed action and completion evidence
Review analysis and computations	Independent Falcon partner	After evidence closure	Documented challenge and approved current version
Authorise delivery and preserve receipts	Engagement lead and client signatory	After professional approval	Final report version and any external acknowledgement

Escalation and change control

Escalate immediately if an actual external date is near, an original contradicts the working facts, the legal framework changes, or the proposed action exceeds the authorised scope. New evidence can change the recommendation. Update the affected calculations, issue analysis and report version, and obtain fresh independent review where the conclusion has changed.

Client communication

Tell the client what is established, what remains uncertain and what they must supply or decide. Explain how missing evidence limits the deliverable. Obtain approval of the final audience and language. Preserve the distinction between internal review, client delivery and authority acceptance.

Technical references and completion record

The official references below were located on 3 October 2026. They are starting points for a real technical review, not a representation that every operative article, amendment, treaty or transitional provision has been checked. No quoted legal passage or current statutory rate is relied on to decide this fictional case.

Indonesian related party transactions

PMK 172 of 2023 - Review the applicable articles, period, documentation, MAP and APA provisions and any subsequent changes.

Open official reference

Transfer pricing analytical framework

OECD Transfer Pricing Guidelines 2022 - Analytical guidance is not a substitute for Indonesian law, treaty text or later relevant guidance.

Open official reference

Required legal applicability record

For each material position, retain the original provision and exact article, authority and version, effective dates, relevant amendments and the reason it applies to the client's facts and period. Record competing interpretations and the specialist's conclusion. Official service pages and OECD guidance have different authority from domestic legislation and treaty text.

Independent completion checks

- The client identity, period and authorised scope match the actual engagement.
- Every material statement is traceable to the original record and preserves any contradiction.
- The calculations are independently reperformed and assumptions are distinguished from legal rules.
- The applicable law and source history support the conclusion for the actual period.
- A different qualified Falcon reviewer records the judgement and material limitations.
- The client authorises the intended delivery and any separate external submission is evidenced.

Sample status: not approved for client issue. No preparer, reviewer or client signature is simulated. Replace the fictional dataset and complete the real engagement review before using this document as a delivery model.

TRANSFER PRICING

Country by Country Reporting Readiness

Contoh Global Manufacturing Group

FY2025 | Prepared for the fictional management team | 3 October 2026

Executive assessment

Hold the sample jurisdiction table for reconciliation. Reporting-entity status, currency policy and data definitions must be established before a filing-ready country by country package can be prepared.

The fictional group has operations in Indonesia, Singapore and Vietnam. Finance has assembled jurisdictional revenue, profit, tax and workforce data from management accounts. Revenue definitions differ across the three source packs, and one pack combines cash tax with the current tax accrual.

Priority	Matter requiring a decision	Current evidence position
High	Revenue definitions are inconsistent	Open for professional review
High	Paid tax and accrued tax are mixed	Open for professional review
High	Reporting responsibilities are unverified	Open for professional review

This is a worked sample, not an issued client opinion. All companies, transactions, evidence records and calculations are fictional. The recommended actions demonstrate professional delivery; they do not establish a tax liability, filing eligibility, benchmark or regulatory approval.

Scope and analytical method

Purpose and intended use

The purpose is to help the fictional management team understand the evidence, the decision still required and the work needed to complete a defensible deliverable. The report is intended for internal discussion with the responsible Falcon professional. It is not a filing, an audit opinion or a guarantee of an authority outcome.

Work performed in the illustrative case

- Reporting entity and notification assessment
- Jurisdiction data and constituent entity mapping
- Definitions and reconciliation
- Schema and submission readiness

Establish the reporting perimeter and period, identify permanent establishments and constituent entities, document the data source hierarchy, and test each field against a consistent definition. Preserve the difference between taxes paid and accrued. Validate the current official schema separately; this report is not an XML file or a filing receipt.

Evidence population

Ref	Illustrative record	Role in the analysis
E01	Indonesia jurisdiction data pack	Starting population and primary bridge
E02	Singapore jurisdiction data pack	Classification and factual support
E03	Vietnam jurisdiction data pack	Exception or corroboration testing
E04	Consolidated accounts and reporting entity register	Decision history and completion support

The references are report-local training identifiers. They are not verified originals, app record IDs or hashes. No real client files were inspected. A live engagement must preserve the actual originals, their versions and the reviewer's assessment of each material claim. The descriptions above define the evidence that the case assumes or explicitly identifies as missing.

Coverage and limitations

Only the stated sample scope is covered. The report does not infer completeness of other entities, years, transactions or tax types. Where the record is incomplete, the analysis identifies the limitation rather than treating management's explanation as verified evidence. Any estimate remains subject to factual validation, current legal applicability and independent review.

Detailed findings and professional response

Priority is a qualitative judgement about the importance of resolving an issue before delivery. High means that the matter could change a material conclusion or prevent completion. Medium means that a control or corroboration improvement is required. These labels are not a probability of assessment or a calculated tax exposure.

Finding 1 Revenue definitions are inconsistent

High priority. E01 uses gross entity revenue for Indonesia, while E02 nets some intercompany charges in Singapore.

Professional implication. The apparent jurisdiction comparison may reflect data policy differences rather than the business.

Recommended response. Use a documented reporting definition and reconcile each local source. Do not force the sum to consolidated revenue without an explained bridge.

Finding 2 Paid tax and accrued tax are mixed

High priority. E03 includes an accrual entry in the paid-tax field.

Professional implication. The presentation could misstate the timing of tax payments and undermine later risk interpretation.

Recommended response. Separate payment records from accruals and map prior-year payments explicitly.

Finding 3 Reporting responsibilities are unverified

High priority. The pack does not identify the legally responsible reporting entity or evidence of notification.

Professional implication. A technically consistent data table does not establish that the correct entity has discharged its obligations.

Recommended response. Review the group status, applicable domestic rules and exchange arrangements for the actual year. Preserve notification and submission evidence.

Counteranalysis and judgement

An incomplete record is not proof that the taxpayer's position is wrong. Equally, an invoice, signed agreement or plausible narrative does not establish every factual or legal element. The reviewer should test alternative explanations and record what evidence would change the assessment. Preserve both supportive and adverse material so that the final conclusion remains balanced.

Financial analysis and decision alternatives

The schedule below makes the numerical reasoning reproducible. All inputs are fictional. The calculation basis states whether a value comes from the assumed record, a formula or an explicit scenario parameter. Figures should not be copied into a live return or used as a benchmark.

Measure	Illustrative result	Calculation basis
Indonesia revenue	600,000	E01
Singapore revenue	300,000	E02
Vietnam revenue	220,000	E03
Jurisdiction revenue total	1,120,000	600,000 plus 300,000 plus 220,000
Consolidated external revenue	1,000,000	E04
Reconciliation difference	120,000	1,120,000 minus 1,000,000

Amounts are IDR million. The 120,000 million difference may include intercompany revenue and source-definition effects. It is not automatically an error or an amount to eliminate from the jurisdiction table. A documented bridge must distinguish differences permitted by the reporting basis from mistakes. The sample does not test any reporting threshold or exemption.

Alternatives for management discussion

Alternative	Practical rationale	Condition before adoption
Reconcile management sources	Uses existing operational data	Requires a consistent policy
Use statutory source packs	Improves audit trail	May require conversion and mapping
Run schema rehearsal	Identifies technical validation issues	Cannot replace legal eligibility review

Management should compare the alternatives using verified facts, operational feasibility and the applicable legal analysis. A more favourable numerical scenario is not evidence that its assumptions are valid. The report therefore recommends completing the unresolved work before selecting a final tax position or an external action.

Recommendations and delivery plan

The following sequence is an illustrative internal work plan measured from engagement kick-off. It is not a statutory timetable. Any external response or filing date must be verified separately and may require faster escalation. The engagement partner remains responsible for the scope and resources agreed with the client.

Work step	Responsible role	Indicative timing	Completion evidence
Confirm scope and procedural facts	Engagement lead	Days 1 to 2	Approved scope and verified external date where relevant
Resolve finding 1	Client finance and Falcon adviser	Days 2 to 5	Original evidence and documented resolution or scope limitation
Resolve finding 2	Technical workstream lead	Days 3 to 7	Originals and approved technical treatment
Resolve finding 3	Client owner and Falcon adviser	Days 3 to 8	Reviewed action and completion evidence
Review analysis and computations	Independent Falcon partner	After evidence closure	Documented challenge and approved current version
Authorise delivery and preserve receipts	Engagement lead and client signatory	After professional approval	Final report version and any external acknowledgement

Escalation and change control

Escalate immediately if an actual external date is near, an original contradicts the working facts, the legal framework changes, or the proposed action exceeds the authorised scope. New evidence can change the recommendation. Update the affected calculations, issue analysis and report version, and obtain fresh independent review where the conclusion has changed.

Client communication

Tell the client what is established, what remains uncertain and what they must supply or decide. Explain how missing evidence limits the deliverable. Obtain approval of the final audience and language. Preserve the distinction between internal review, client delivery and authority acceptance.

Technical references and completion record

The official references below were located on 3 October 2026. They are starting points for a real technical review, not a representation that every operative article, amendment, treaty or transitional provision has been checked. No quoted legal passage or current statutory rate is relied on to decide this fictional case.

Indonesian related party transactions

PMK 172 of 2023 - Review the applicable articles, period, documentation, MAP and APA provisions and any subsequent changes.

Open official reference

Transfer pricing analytical framework

OECD Transfer Pricing Guidelines 2022 - Analytical guidance is not a substitute for Indonesian law, treaty text or later relevant guidance.

Open official reference

Required legal applicability record

For each material position, retain the original provision and exact article, authority and version, effective dates, relevant amendments and the reason it applies to the client's facts and period. Record competing interpretations and the specialist's conclusion. Official service pages and OECD guidance have different authority from domestic legislation and treaty text.

Independent completion checks

- The client identity, period and authorised scope match the actual engagement.
- Every material statement is traceable to the original record and preserves any contradiction.
- The calculations are independently reperformed and assumptions are distinguished from legal rules.
- The applicable law and source history support the conclusion for the actual period.
- A different qualified Falcon reviewer records the judgement and material limitations.
- The client authorises the intended delivery and any separate external submission is evidenced.

Sample status: not approved for client issue. No preparer, reviewer or client signature is simulated. Replace the fictional dataset and complete the real engagement review before using this document as a delivery model.

TAX DISPUTE

SP2DK Response and Evidence Report

PT Contoh Jasa Bisnis

FY2025 | Prepared for the fictional management team | 3 October 2026

Executive assessment

Prepare a measured factual response to the enquiry, supported by an indexed service-evidence package. Do not submit a categorical statement that all management fees are supported while the delivery and allocation records remain incomplete.

A fictional enquiry questions regional management service costs of IDR 4,800 million. Finance supplies invoices and an agreement. The delivery register supports 3,000 million of allocated activities; 1,800 million has no matching deliverable entry. The printed notice date and actual receipt date have not been reconciled.

Priority	Matter requiring a decision	Current evidence position
High	Evidence gap concerns delivery	Open for professional review
High	Notice chronology is unresolved	Open for professional review
Medium	Draft language exceeds support	Open for professional review

This is a worked sample, not an issued client opinion. All companies, transactions, evidence records and calculations are fictional. The recommended actions demonstrate professional delivery; they do not establish a tax liability, filing eligibility, benchmark or regulatory approval.

Scope and analytical method

Purpose and intended use

The purpose is to help the fictional management team understand the evidence, the decision still required and the work needed to complete a defensible deliverable. The report is intended for internal discussion with the responsible Falcon professional. It is not a filing, an audit opinion or a guarantee of an authority outcome.

Work performed in the illustrative case

- Notice and authority position
- Service receipt and allocation evidence
- Issue-by-issue response narrative
- Response authority and delivery records

Preserve the notice and proof of service, reconcile costs to the ledger, and test the claimed services against outputs, recipients and allocation records. Separate statements made by management from corroborated facts. Prepare a response that answers the actual questions without volunteering unsupported legal conclusions.

Evidence population

Ref	Illustrative record	Role in the analysis
E01	Management fee ledger and invoices	Starting population and primary bridge
E02	Service agreement	Classification and factual support
E03	Deliverable and recipient register	Exception or corroboration testing
E04	Enquiry notice and receipt record	Decision history and completion support

The references are report-local training identifiers. They are not verified originals, app record IDs or hashes. No real client files were inspected. A live engagement must preserve the actual originals, their versions and the reviewer's assessment of each material claim. The descriptions above define the evidence that the case assumes or explicitly identifies as missing.

Coverage and limitations

Only the stated sample scope is covered. The report does not infer completeness of other entities, years, transactions or tax types. Where the record is incomplete, the analysis identifies the limitation rather than treating management's explanation as verified evidence. Any estimate remains subject to factual validation, current legal applicability and independent review.

Detailed findings and professional response

Priority is a qualitative judgement about the importance of resolving an issue before delivery. High means that the matter could change a material conclusion or prevent completion. Medium means that a control or corroboration improvement is required. These labels are not a probability of assessment or a calculated tax exposure.

Finding 1 Evidence gap concerns delivery

High priority. E01 and E02 support the invoice and contractual framework. E03 supports activities for only 3,000 million of the 4,800 million charge.

Professional implication. The gap concerns evidence of performance and allocation, not merely the existence of an invoice.

Recommended response. Obtain deliverables, recipient confirmations and the allocation rationale for the remaining population. Explain what remains outstanding.

Finding 2 Notice chronology is unresolved

High priority. E04 records a printed date but no verified delivery record.

Professional implication. An operational response plan cannot substitute for determining the applicable procedural requirements and service date.

Recommended response. Have the dispute lead verify the original notice, receipt evidence and current rules. Record the verified deadline outside the illustrative schedule.

Finding 3 Draft language exceeds support

Medium priority. The proposed management response states that every charge generated a measurable benefit. The supplied record does not establish that claim.

Professional implication. Overstatement could reduce credibility and constrain later explanations.

Recommended response. Use a factual account of activities and identify outstanding support. Preserve the reviewed response and its attachment index.

Counteranalysis and judgement

An incomplete record is not proof that the taxpayer's position is wrong. Equally, an invoice, signed agreement or plausible narrative does not establish every factual or legal element. The reviewer should test alternative explanations and record what evidence would change the assessment. Preserve both supportive and adverse material so that the final conclusion remains balanced.

Financial analysis and decision alternatives

The schedule below makes the numerical reasoning reproducible. All inputs are fictional. The calculation basis states whether a value comes from the assumed record, a formula or an explicit scenario parameter. Figures should not be copied into a live return or used as a benchmark.

Measure	Illustrative result	Calculation basis
Service charge population	4,800	E01
Mapped delivery evidence	3,000	E03
Unmapped population	1,800	4,800 minus 3,000
Mapped share	62.50%	3,000 divided by 4,800

Amounts are IDR million. The unmapped 1,800 million is an evidence population, not a tax assessment or an automatic disallowance. The 62.50% measure describes documentary coverage in the fictional pack. It says nothing about legal acceptance of the charge. No response deadline, penalty or likelihood of success is calculated.

Alternatives for management discussion

Alternative	Practical rationale	Condition before adoption
Factual response with disclosed gaps	Answers supported matters now	Timing and completeness need professional judgement
Supplement the evidence package	Improves factual support	Requires authentic underlying records
Escalate disputed legal issues	Separates interpretation from facts	Needs independent Falcon position review

Management should compare the alternatives using verified facts, operational feasibility and the applicable legal analysis. A more favourable numerical scenario is not evidence that its assumptions are valid. The report therefore recommends completing the unresolved work before selecting a final tax position or an external action.

Recommendations and delivery plan

The following sequence is an illustrative internal work plan measured from engagement kick-off. It is not a statutory timetable. Any external response or filing date must be verified separately and may require faster escalation. The engagement partner remains responsible for the scope and resources agreed with the client.

Work step	Responsible role	Indicative timing	Completion evidence
Confirm scope and procedural facts	Engagement lead	Days 1 to 2	Approved scope and verified external date where relevant
Resolve finding 1	Client finance and Falcon adviser	Days 2 to 5	Original evidence and documented resolution or scope limitation
Resolve finding 2	Technical workstream lead	Days 3 to 7	Originals and approved technical treatment
Resolve finding 3	Client owner and Falcon adviser	Days 3 to 8	Reviewed action and completion evidence
Review analysis and computations	Independent Falcon partner	After evidence closure	Documented challenge and approved current version
Authorise delivery and preserve receipts	Engagement lead and client signatory	After professional approval	Final report version and any external acknowledgement

Escalation and change control

Escalate immediately if an actual external date is near, an original contradicts the working facts, the legal framework changes, or the proposed action exceeds the authorised scope. New evidence can change the recommendation. Update the affected calculations, issue analysis and report version, and obtain fresh independent review where the conclusion has changed.

Client communication

Tell the client what is established, what remains uncertain and what they must supply or decide. Explain how missing evidence limits the deliverable. Obtain approval of the final audience and language. Preserve the distinction between internal review, client delivery and authority acceptance.

Technical references and completion record

The official references below were located on 3 October 2026. They are starting points for a real technical review, not a representation that every operative article, amendment, treaty or transitional provision has been checked. No quoted legal passage or current statutory rate is relied on to decide this fictional case.

Indonesian tax administration

PMK 81 of 2024 and amendment history - The JDIH page lists amendment history including PMK 1 of 2026. Retrieve applicable originals and check all later amendments before use.

Open official reference

Tax examination framework

PMK 15 of 2025 - Check applicability, transition and actual audit documents. This is not a source for an assumed SP2DK deadline.

Open official reference

Required legal applicability record

For each material position, retain the original provision and exact article, authority and version, effective dates, relevant amendments and the reason it applies to the client's facts and period. Record competing interpretations and the specialist's conclusion. Official service pages and OECD guidance have different authority from domestic legislation and treaty text.

Independent completion checks

- The client identity, period and authorised scope match the actual engagement.
- Every material statement is traceable to the original record and preserves any contradiction.
- The calculations are independently reperformed and assumptions are distinguished from legal rules.
- The applicable law and source history support the conclusion for the actual period.
- A different qualified Falcon reviewer records the judgement and material limitations.
- The client authorises the intended delivery and any separate external submission is evidenced.

Sample status: not approved for client issue. No preparer, reviewer or client signature is simulated. Replace the fictional dataset and complete the real engagement review before using this document as a delivery model.

TAX DISPUTE

Tax Audit Defence Report

PT Contoh Manufaktur Utama

FY2025 | Prepared for the fictional management team | 3 October 2026

Executive assessment

Defend the audit issue through a controlled reconciliation of the authority's proposal and the taxpayer's evidence. In the sample, 600 million of a 1,800 million proposed adjustment is explained by timing; the remaining 1,200 million requires a substantive position and corroboration.

The fictional audit team proposes a cost adjustment of IDR 1,800 million. The cost ledger and receiving register identify a 600 million cut-off item, while 1,200 million relates to outsourced technical services. A supplier invoice exists, but the full record of acceptance and use has not been assembled.

Priority	Matter requiring a decision	Current evidence position
Medium	Timing explanation needs period proof	Open for professional review
High	Service population remains disputed	Open for professional review
Medium	Oral explanations are not controlled	Open for professional review

This is a worked sample, not an issued client opinion. All companies, transactions, evidence records and calculations are fictional. The recommended actions demonstrate professional delivery; they do not establish a tax liability, filing eligibility, benchmark or regulatory approval.

Scope and analytical method

Purpose and intended use

The purpose is to help the fictional management team understand the evidence, the decision still required and the work needed to complete a defensible deliverable. The report is intended for internal discussion with the responsible Falcon professional. It is not a filing, an audit opinion or a guarantee of an authority outcome.

Work performed in the illustrative case

- Audit request and proposed adjustment register
- Cost and cut-off reconciliation
- Evidence-supported defence and counteranalysis
- Meeting and submission control

Reperform the proposal bridge, trace each item to original evidence and identify the authority's actual reason for adjustment. Test the strongest opposing explanation. Distinguish an accounting timing difference from a legal question about recognition or deductibility. Maintain a controlled response log and record what was supplied.

Evidence population

Ref	Illustrative record	Role in the analysis
E01	Authority proposal and request log	Starting population and primary bridge
E02	Goods receipt and accrual bridge	Classification and factual support
E03	Technical service acceptance evidence	Exception or corroboration testing
E04	Audit meeting and attachment register	Decision history and completion support

The references are report-local training identifiers. They are not verified originals, app record IDs or hashes. No real client files were inspected. A live engagement must preserve the actual originals, their versions and the reviewer's assessment of each material claim. The descriptions above define the evidence that the case assumes or explicitly identifies as missing.

Coverage and limitations

Only the stated sample scope is covered. The report does not infer completeness of other entities, years, transactions or tax types. Where the record is incomplete, the analysis identifies the limitation rather than treating management's explanation as verified evidence. Any estimate remains subject to factual validation, current legal applicability and independent review.

Detailed findings and professional response

Priority is a qualitative judgement about the importance of resolving an issue before delivery. High means that the matter could change a material conclusion or prevent completion. Medium means that a control or corroboration improvement is required. These labels are not a probability of assessment or a calculated tax exposure.

Finding 1 Timing explanation needs period proof

Medium priority. E02 matches 600 million to a receiving event, but the recording and acceptance dates require confirmation.

Professional implication. A plausible timing narrative does not establish the correct tax period.

Recommended response. Obtain dated acceptance, accrual and subsequent posting records and reconcile the relevant periods.

Finding 2 Service population remains disputed

High priority. E03 contains an invoice for 1,200 million without complete technical acceptance records.

Professional implication. A contractual liability and tax recognition are separate questions.

Recommended response. Obtain work orders, outputs, approval records and the applicable legal analysis before finalising the defence.

Finding 3 Oral explanations are not controlled

Medium priority. E04 records meetings but does not link each explanation to its submitted attachments.

Professional implication. The taxpayer cannot readily demonstrate the exact evidence considered or avoid inconsistent statements.

Recommended response. Maintain a response register with issue, version, author, attachment and acknowledgement fields.

Counteranalysis and judgement

An incomplete record is not proof that the taxpayer's position is wrong. Equally, an invoice, signed agreement or plausible narrative does not establish every factual or legal element. The reviewer should test alternative explanations and record what evidence would change the assessment. Preserve both supportive and adverse material so that the final conclusion remains balanced.

Financial analysis and decision alternatives

The schedule below makes the numerical reasoning reproducible. All inputs are fictional. The calculation basis states whether a value comes from the assumed record, a formula or an explicit scenario parameter. Figures should not be copied into a live return or used as a benchmark.

Measure	Illustrative result	Calculation basis
Proposed cost adjustment	1,800	E01
Timing item under review	600	E02
Substantive service item	1,200	E03
Bridge control	1,800	600 plus 1,200

Amounts are IDR million. The bridge reconciles the proposed adjustment population only. It does not compute tax payable, interest or penalties. If the timing issue is resolved, the impact depends on the legally correct recognition period and any corresponding adjustment. The service item remains a separate evidential and legal question.

Alternatives for management discussion

Alternative	Practical rationale	Condition before adoption
Accept an evidenced correction	Resolves a demonstrable mistake	Requires verified period and tax impact
Defend supported items	Preserves the taxpayer position	Requires original evidence and counteranalysis
Prepare for a dispute stage	Maintains continuity if unresolved	Must separately verify procedural requirements

Management should compare the alternatives using verified facts, operational feasibility and the applicable legal analysis. A more favourable numerical scenario is not evidence that its assumptions are valid. The report therefore recommends completing the unresolved work before selecting a final tax position or an external action.

Recommendations and delivery plan

The following sequence is an illustrative internal work plan measured from engagement kick-off. It is not a statutory timetable. Any external response or filing date must be verified separately and may require faster escalation. The engagement partner remains responsible for the scope and resources agreed with the client.

Work step	Responsible role	Indicative timing	Completion evidence
Confirm scope and procedural facts	Engagement lead	Days 1 to 2	Approved scope and verified external date where relevant
Resolve finding 1	Client finance and Falcon adviser	Days 2 to 5	Original evidence and documented resolution or scope limitation
Resolve finding 2	Technical workstream lead	Days 3 to 7	Originals and approved technical treatment
Resolve finding 3	Client owner and Falcon adviser	Days 3 to 8	Reviewed action and completion evidence
Review analysis and computations	Independent Falcon partner	After evidence closure	Documented challenge and approved current version
Authorise delivery and preserve receipts	Engagement lead and client signatory	After professional approval	Final report version and any external acknowledgement

Escalation and change control

Escalate immediately if an actual external date is near, an original contradicts the working facts, the legal framework changes, or the proposed action exceeds the authorised scope. New evidence can change the recommendation. Update the affected calculations, issue analysis and report version, and obtain fresh independent review where the conclusion has changed.

Client communication

Tell the client what is established, what remains uncertain and what they must supply or decide. Explain how missing evidence limits the deliverable. Obtain approval of the final audience and language. Preserve the distinction between internal review, client delivery and authority acceptance.

Technical references and completion record

The official references below were located on 3 October 2026. They are starting points for a real technical review, not a representation that every operative article, amendment, treaty or transitional provision has been checked. No quoted legal passage or current statutory rate is relied on to decide this fictional case.

Tax examination framework

PMK 15 of 2025 - Check applicability, transition and actual audit documents. This is not a source for an assumed SP2DK deadline.

Open official reference

Indonesian tax administration

PMK 81 of 2024 and amendment history - The JDIH page lists amendment history including PMK 1 of 2026. Retrieve applicable originals and check all later amendments before use.

Open official reference

Required legal applicability record

For each material position, retain the original provision and exact article, authority and version, effective dates, relevant amendments and the reason it applies to the client's facts and period. Record competing interpretations and the specialist's conclusion. Official service pages and OECD guidance have different authority from domestic legislation and treaty text.

Independent completion checks

- The client identity, period and authorised scope match the actual engagement.
- Every material statement is traceable to the original record and preserves any contradiction.
- The calculations are independently reperformed and assumptions are distinguished from legal rules.
- The applicable law and source history support the conclusion for the actual period.
- A different qualified Falcon reviewer records the judgement and material limitations.
- The client authorises the intended delivery and any separate external submission is evidenced.

Sample status: not approved for client issue. No preparer, reviewer or client signature is simulated. Replace the fictional dataset and complete the real engagement review before using this document as a delivery model.

TAX DISPUTE

Objection and Appeal Strategy Report

PT Contoh Industri Sejahtera

FY2025 disputed assessment | Prepared for the fictional management team | 3 October 2026

Executive assessment

Prepare an issue-specific legal and evidence record before deciding the next dispute step. The sample distinguishes the assessed amount, the taxpayer's proposed amount and the resulting disagreement; no success probability or filing deadline is assumed.

A fictional assessment records tax of IDR 2,400 million. Management's proposed corrected computation is 900 million. The 1,500 million difference comprises a 1,000 million service issue and a 500 million revenue cut-off issue. The pack lacks verified service of the operative decision and a complete record of prior submissions.

Priority	Matter requiring a decision	Current evidence position
High	Admissibility has not been established	Open for professional review
High	Grounds do not yet mirror the computation	Open for professional review
Medium	Prior evidence record is incomplete	Open for professional review

This is a worked sample, not an issued client opinion. All companies, transactions, evidence records and calculations are fictional. The recommended actions demonstrate professional delivery; they do not establish a tax liability, filing eligibility, benchmark or regulatory approval.

Scope and analytical method

Purpose and intended use

The purpose is to help the fictional management team understand the evidence, the decision still required and the work needed to complete a defensible deliverable. The report is intended for internal discussion with the responsible Falcon professional. It is not a filing, an audit opinion or a guarantee of an authority outcome.

Work performed in the illustrative case

- Assessment and decision chronology
- Grounds and corrected computation
- Evidence and opposing analysis
- Objection appeal and further remedy assessment

Reconstruct each operative document, verify standing and authority, and analyse admissibility independently of the merits. Link each ground to the disputed computation and original evidence. For appeal or judicial review, assess the relevant procedural route and review standard separately; one narrative should not be reused without stage-specific analysis.

Evidence population

Ref	Illustrative record	Role in the analysis
E01	Assessment and operative decisions	Starting population and primary bridge
E02	Taxpayer corrected computation	Classification and factual support
E03	Issue and relief bridge	Exception or corroboration testing
E04	Prior submission and evidence record	Decision history and completion support

The references are report-local training identifiers. They are not verified originals, app record IDs or hashes. No real client files were inspected. A live engagement must preserve the actual originals, their versions and the reviewer's assessment of each material claim. The descriptions above define the evidence that the case assumes or explicitly identifies as missing.

Coverage and limitations

Only the stated sample scope is covered. The report does not infer completeness of other entities, years, transactions or tax types. Where the record is incomplete, the analysis identifies the limitation rather than treating management's explanation as verified evidence. Any estimate remains subject to factual validation, current legal applicability and independent review.

Detailed findings and professional response

Priority is a qualitative judgement about the importance of resolving an issue before delivery. High means that the matter could change a material conclusion or prevent completion. Medium means that a control or corroboration improvement is required. These labels are not a probability of assessment or a calculated tax exposure.

Finding 1 Admissibility has not been established

High priority. E01 does not include a verified receipt record for the operative decision.

Professional implication. An arguable substantive case can fail if the procedural route or requirements are not satisfied.

Recommended response. Have counsel document service, authority, filing requirements and the current applicable rule. Do not derive a deadline from the printed date alone.

Finding 2 Grounds do not yet mirror the computation

High priority. E02 identifies a 1,500 million difference, while the initial narrative discusses only the service issue.

Professional implication. An omitted cut-off ground could leave part of the disputed amount unexplained.

Recommended response. Prepare a ground-by-ground bridge with requested relief and its arithmetic support.

Finding 3 Prior evidence record is incomplete

Medium priority. E04 lists correspondence but does not preserve all submitted attachments.

Professional implication. Later-stage evidential arguments need an accurate record of what was previously supplied and considered.

Recommended response. Recover the complete record and distinguish existing evidence from new material. Seek stage-specific advice on its use.

Counteranalysis and judgement

An incomplete record is not proof that the taxpayer's position is wrong. Equally, an invoice, signed agreement or plausible narrative does not establish every factual or legal element. The reviewer should test alternative explanations and record what evidence would change the assessment. Preserve both supportive and adverse material so that the final conclusion remains balanced.

Financial analysis and decision alternatives

The schedule below makes the numerical reasoning reproducible. All inputs are fictional. The calculation basis states whether a value comes from the assumed record, a formula or an explicit scenario parameter. Figures should not be copied into a live return or used as a benchmark.

Measure	Illustrative result	Calculation basis
Assessed tax	2,400	E01
Taxpayer proposed tax	900	E02
Disagreement	1,500	2,400 minus 900
Service issue component	1,000	E03
Cut-off issue component	500	E03

Amounts are IDR million. The disagreement reconciles to 1,000 plus 500 million. These are illustrative amounts in a corrected computation, not a validated liability. Payments, collection status and any security or sanction effects require separate verification. Expected-value litigation models are excluded because no defensible probability has been supplied.

Alternatives for management discussion

Alternative	Practical rationale	Condition before adoption
Seek supported correction	Focuses on demonstrated errors	Relief and procedure must be checked
Pursue the appropriate dispute route	Preserves substantive grounds	Requires admissibility and authority review
Consider a further remedy	Addresses an adverse outcome	Needs distinct counsel assessment and standards

Management should compare the alternatives using verified facts, operational feasibility and the applicable legal analysis. A more favourable numerical scenario is not evidence that its assumptions are valid. The report therefore recommends completing the unresolved work before selecting a final tax position or an external action.

Recommendations and delivery plan

The following sequence is an illustrative internal work plan measured from engagement kick-off. It is not a statutory timetable. Any external response or filing date must be verified separately and may require faster escalation. The engagement partner remains responsible for the scope and resources agreed with the client.

Work step	Responsible role	Indicative timing	Completion evidence
Confirm scope and procedural facts	Engagement lead	Days 1 to 2	Approved scope and verified external date where relevant
Resolve finding 1	Client finance and Falcon adviser	Days 2 to 5	Original evidence and documented resolution or scope limitation
Resolve finding 2	Technical workstream lead	Days 3 to 7	Originals and approved technical treatment
Resolve finding 3	Client owner and Falcon adviser	Days 3 to 8	Reviewed action and completion evidence
Review analysis and computations	Independent Falcon partner	After evidence closure	Documented challenge and approved current version
Authorise delivery and preserve receipts	Engagement lead and client signatory	After professional approval	Final report version and any external acknowledgement

Escalation and change control

Escalate immediately if an actual external date is near, an original contradicts the working facts, the legal framework changes, or the proposed action exceeds the authorised scope. New evidence can change the recommendation. Update the affected calculations, issue analysis and report version, and obtain fresh independent review where the conclusion has changed.

Client communication

Tell the client what is established, what remains uncertain and what they must supply or decide. Explain how missing evidence limits the deliverable. Obtain approval of the final audience and language. Preserve the distinction between internal review, client delivery and authority acceptance.

Technical references and completion record

The official references below were located on 3 October 2026. They are starting points for a real technical review, not a representation that every operative article, amendment, treaty or transitional provision has been checked. No quoted legal passage or current statutory rate is relied on to decide this fictional case.

Objection service information

DJP Keberatan - Service guidance is a starting point. Verify operative legislation, admissibility, payments and the actual service date.

Open official reference

Appeal service information

DJP Banding - Verify current law, competent representation and stage-specific requirements. This sample does not compute a deadline.

Open official reference

Indonesian tax administration

PMK 81 of 2024 and amendment history - The JDIH page lists amendment history including PMK 1 of 2026. Retrieve applicable originals and check all later amendments before use.

Open official reference

Required legal applicability record

For each material position, retain the original provision and exact article, authority and version, effective dates, relevant amendments and the reason it applies to the client's facts and period. Record competing interpretations and the specialist's conclusion. Official service pages and OECD guidance have different authority from domestic legislation and treaty text.

Independent completion checks

- The client identity, period and authorised scope match the actual engagement.
- Every material statement is traceable to the original record and preserves any contradiction.
- The calculations are independently reperformed and assumptions are distinguished from legal rules.
- The applicable law and source history support the conclusion for the actual period.
- A different qualified Falcon reviewer records the judgement and material limitations.
- The client authorises the intended delivery and any separate external submission is evidenced.

Sample status: not approved for client issue. No preparer, reviewer or client signature is simulated. Replace the fictional dataset and complete the real engagement review before using this document as a delivery model.

INTERNATIONAL DISPUTE PREVENTION

MAP and APA Feasibility Report

Contoh Bilateral Trading Group

FY2025 and prospective pricing periods | Prepared for the fictional management team | 3 October 2026

Executive assessment

Treat MAP and APA as distinct workstreams. The sample suggests investigating relief from an existing cross-border adjustment and a separate prospective pricing arrangement, but neither eligibility nor bilateral agreement is established.

The fictional Indonesian and overseas entities have cross-border transactions of IDR 80,000 million. A foreign adjustment increases the overseas entity's taxable profit by 4,000 million. Management asks whether corresponding relief and future certainty can be achieved through competent authority discussions.

Priority	Matter requiring a decision	Current evidence position
High	Treaty route needs verification	Open for professional review
High	Adjustment does not equal cash tax	Open for professional review
Medium	Prospective assumptions are undefined	Open for professional review

This is a worked sample, not an issued client opinion. All companies, transactions, evidence records and calculations are fictional. The recommended actions demonstrate professional delivery; they do not establish a tax liability, filing eligibility, benchmark or regulatory approval.

Scope and analytical method

Purpose and intended use

The purpose is to help the fictional management team understand the evidence, the decision still required and the work needed to complete a defensible deliverable. The report is intended for internal discussion with the responsible Falcon professional. It is not a filing, an audit opinion or a guarantee of an authority outcome.

Work performed in the illustrative case

- Existing adjustment and potential double taxation
- Treaty and domestic route assessment
- Prospective transaction and pricing facts
- Information exchange and governance

Identify the taxes, entities and periods implicated by the adjustment and determine the applicable treaty and domestic framework. Reconstruct the pricing analysis and assess whether the same income is affected in both jurisdictions. For a prospective APA, define transaction coverage, pricing method, critical assumptions and the information needed by the relevant authorities.

Evidence population

Ref	Illustrative record	Role in the analysis
E01	Foreign adjustment and tax computation	Starting population and primary bridge
E02	Cross-border transaction ledger	Classification and factual support
E03	Prospective business and functional plan	Exception or corroboration testing
E04	Jurisdiction and treaty research register	Decision history and completion support

The references are report-local training identifiers. They are not verified originals, app record IDs or hashes. No real client files were inspected. A live engagement must preserve the actual originals, their versions and the reviewer's assessment of each material claim. The descriptions above define the evidence that the case assumes or explicitly identifies as missing.

Coverage and limitations

Only the stated sample scope is covered. The report does not infer completeness of other entities, years, transactions or tax types. Where the record is incomplete, the analysis identifies the limitation rather than treating management's explanation as verified evidence. Any estimate remains subject to factual validation, current legal applicability and independent review.

Detailed findings and professional response

Priority is a qualitative judgement about the importance of resolving an issue before delivery. High means that the matter could change a material conclusion or prevent completion. Medium means that a control or corroboration improvement is required. These labels are not a probability of assessment or a calculated tax exposure.

Finding 1 Treaty route needs verification

High priority. E04 identifies two jurisdictions but provides no verified treaty text or competent authority analysis.

Professional implication. A cross-border adjustment alone does not prove the availability or scope of treaty relief.

Recommended response. Verify the treaty, covered persons and taxes, relevant provisions and current procedural rules.

Finding 2 Adjustment does not equal cash tax

High priority. E01 records a 4,000 million profit adjustment without the corresponding tax computation and collection record.

Professional implication. The amount at risk cannot be described as paid double tax or potential recovery.

Recommended response. Obtain both jurisdictions' computations and payment status. Reconcile the same transaction and income.

Finding 3 Prospective assumptions are undefined

Medium priority. The business plan in E03 anticipates changes in product mix and distribution functions.

Professional implication. A proposed pricing approach may not remain suitable as functions or economics change.

Recommended response. Define the prospective scope and measurable critical assumptions, with monitoring responsibility.

Counteranalysis and judgement

An incomplete record is not proof that the taxpayer's position is wrong. Equally, an invoice, signed agreement or plausible narrative does not establish every factual or legal element. The reviewer should test alternative explanations and record what evidence would change the assessment. Preserve both supportive and adverse material so that the final conclusion remains balanced.

Financial analysis and decision alternatives

The schedule below makes the numerical reasoning reproducible. All inputs are fictional. The calculation basis states whether a value comes from the assumed record, a formula or an explicit scenario parameter. Figures should not be copied into a live return or used as a benchmark.

Measure	Illustrative result	Calculation basis
Controlled transaction value	80,000	E02
Foreign profit adjustment	4,000	E01
Adjustment relative to transactions	5.00%	4,000 divided by 80,000
Cash tax or relief	Not quantified	Tax computations not supplied

Amounts are IDR million. The 5.00% ratio describes the adjustment relative to transaction value; it is not a tax rate, royalty benchmark or agreed margin. A treaty analysis, foreign computation and domestic treatment are needed before estimating double taxation. Prospective pricing should use tested assumptions rather than this historical ratio.

Alternatives for management discussion

Alternative	Practical rationale	Condition before adoption
Investigate MAP eligibility	Addresses an existing cross-border issue	Relief is subject to verified rules and authority process
Evaluate a prospective APA	May clarify future transaction pricing	Requires scope and critical assumptions
Coordinate domestic remedies	Preserves the broader dispute strategy	Interaction and timing need counsel review

Management should compare the alternatives using verified facts, operational feasibility and the applicable legal analysis. A more favourable numerical scenario is not evidence that its assumptions are valid. The report therefore recommends completing the unresolved work before selecting a final tax position or an external action.

Recommendations and delivery plan

The following sequence is an illustrative internal work plan measured from engagement kick-off. It is not a statutory timetable. Any external response or filing date must be verified separately and may require faster escalation. The engagement partner remains responsible for the scope and resources agreed with the client.

Work step	Responsible role	Indicative timing	Completion evidence
Confirm scope and procedural facts	Engagement lead	Days 1 to 2	Approved scope and verified external date where relevant
Resolve finding 1	Client finance and Falcon adviser	Days 2 to 5	Original evidence and documented resolution or scope limitation
Resolve finding 2	Technical workstream lead	Days 3 to 7	Originals and approved technical treatment
Resolve finding 3	Client owner and Falcon adviser	Days 3 to 8	Reviewed action and completion evidence
Review analysis and computations	Independent Falcon partner	After evidence closure	Documented challenge and approved current version
Authorise delivery and preserve receipts	Engagement lead and client signatory	After professional approval	Final report version and any external acknowledgement

Escalation and change control

Escalate immediately if an actual external date is near, an original contradicts the working facts, the legal framework changes, or the proposed action exceeds the authorised scope. New evidence can change the recommendation. Update the affected calculations, issue analysis and report version, and obtain fresh independent review where the conclusion has changed.

Client communication

Tell the client what is established, what remains uncertain and what they must supply or decide. Explain how missing evidence limits the deliverable. Obtain approval of the final audience and language. Preserve the distinction between internal review, client delivery and authority acceptance.

Technical references and completion record

The official references below were located on 3 October 2026. They are starting points for a real technical review, not a representation that every operative article, amendment, treaty or transitional provision has been checked. No quoted legal passage or current statutory rate is relied on to decide this fictional case.

Indonesian related party transactions

PMK 172 of 2023 - Review the applicable articles, period, documentation, MAP and APA provisions and any subsequent changes.

Open official reference

Transfer pricing analytical framework

OECD Transfer Pricing Guidelines 2022 - Analytical guidance is not a substitute for Indonesian law, treaty text or later relevant guidance.

Open official reference

Required legal applicability record

For each material position, retain the original provision and exact article, authority and version, effective dates, relevant amendments and the reason it applies to the client's facts and period. Record competing interpretations and the specialist's conclusion. Official service pages and OECD guidance have different authority from domestic legislation and treaty text.

Independent completion checks

- The client identity, period and authorised scope match the actual engagement.
- Every material statement is traceable to the original record and preserves any contradiction.
- The calculations are independently reperformed and assumptions are distinguished from legal rules.
- The applicable law and source history support the conclusion for the actual period.
- A different qualified Falcon reviewer records the judgement and material limitations.
- The client authorises the intended delivery and any separate external submission is evidenced.

Sample status: not approved for client issue. No preparer, reviewer or client signature is simulated. Replace the fictional dataset and complete the real engagement review before using this document as a delivery model.

COMPLIANCE RETAINER

Monthly Tax Care Report

PT Contoh Perdagangan Harian

September 2026 | Prepared for the fictional management team | 3 October 2026

Executive assessment

Close the sales reconciliation and withholding certificate gap before authorising the monthly compliance package. The sample ledger-to-register differences are quantified, but the pack does not yet demonstrate complete reporting and payment evidence.

The fictional monthly close contains sales of IDR 12,000 million, invoice-register value of 11,850 million and return-draft value of 11,700 million. Finance also identifies tax credits in its ledger that have not all been matched to original certificates. No filing deadline or statutory rate is inferred from this sample.

Priority	Matter requiring a decision	Current evidence position
High	Sales bridge is not complete	Open for professional review
Medium	Credits lack complete originals	Open for professional review
High	Submission evidence is outstanding	Open for professional review

This is a worked sample, not an issued client opinion. All companies, transactions, evidence records and calculations are fictional. The recommended actions demonstrate professional delivery; they do not establish a tax liability, filing eligibility, benchmark or regulatory approval.

Scope and analytical method

Purpose and intended use

The purpose is to help the fictional management team understand the evidence, the decision still required and the work needed to complete a defensible deliverable. The report is intended for internal discussion with the responsible Falcon professional. It is not a filing, an audit opinion or a guarantee of an authority outcome.

Work performed in the illustrative case

- Sales and purchase reconciliation
- Payroll and withholding interfaces
- Obligation preparation and review
- Filing and payment evidence

Reconcile the source ledgers to invoice and return populations, investigate cut-off and classification differences, and trace credits to authentic certificates. Prepare a verified obligation calendar and ensure each filing package has an independent review, authorised submission and preserved external receipt.

Evidence population

Ref	Illustrative record	Role in the analysis
E01	Monthly general ledger	Starting population and primary bridge
E02	Sales and purchase invoice register	Classification and factual support
E03	Return draft and obligation register	Exception or corroboration testing
E04	Withholding certificate and payment pack	Decision history and completion support

The references are report-local training identifiers. They are not verified originals, app record IDs or hashes. No real client files were inspected. A live engagement must preserve the actual originals, their versions and the reviewer's assessment of each material claim. The descriptions above define the evidence that the case assumes or explicitly identifies as missing.

Coverage and limitations

Only the stated sample scope is covered. The report does not infer completeness of other entities, years, transactions or tax types. Where the record is incomplete, the analysis identifies the limitation rather than treating management's explanation as verified evidence. Any estimate remains subject to factual validation, current legal applicability and independent review.

Detailed findings and professional response

Priority is a qualitative judgement about the importance of resolving an issue before delivery. High means that the matter could change a material conclusion or prevent completion. Medium means that a control or corroboration improvement is required. These labels are not a probability of assessment or a calculated tax exposure.

Finding 1 Sales bridge is not complete

High priority. E01 exceeds E02 by 150 million and E03 by 300 million.

Professional implication. The return population may omit transactions or use a different period or tax base.

Recommended response. Reconcile each exception by transaction and document the cause, period and proposed treatment.

Finding 2 Credits lack complete originals

Medium priority. E04 lists 240 million of recorded credits, with originals matching only 210 million.

Professional implication. The remaining 30 million cannot be treated as a supported credit merely because it appears in the ledger.

Recommended response. Obtain original certificates, verify identity and period, and preserve the reconciliation.

Finding 3 Submission evidence is outstanding

High priority. The monthly pack contains draft outputs but no official receipts or payment references.

Professional implication. Preparation and review do not prove that external obligations have been completed.

Recommended response. Verify actual obligations and record authorised filing, payment and receipt evidence separately.

Counteranalysis and judgement

An incomplete record is not proof that the taxpayer's position is wrong. Equally, an invoice, signed agreement or plausible narrative does not establish every factual or legal element. The reviewer should test alternative explanations and record what evidence would change the assessment. Preserve both supportive and adverse material so that the final conclusion remains balanced.

Financial analysis and decision alternatives

The schedule below makes the numerical reasoning reproducible. All inputs are fictional. The calculation basis states whether a value comes from the assumed record, a formula or an explicit scenario parameter. Figures should not be copied into a live return or used as a benchmark.

Measure	Illustrative result	Calculation basis
Sales ledger	12,000	E01
Invoice register	11,850	E02
Return draft	11,700	E03
Ledger versus invoices	150	12,000 minus 11,850
Ledger versus return	300	12,000 minus 11,700
Unmatched credits	30	240 minus 210

Amounts are IDR million and represent transaction or credit amounts, not a monthly tax computation. The 150 and 300 million differences overlap within the sales bridge and must not be added as two independent exposures. The 30 million credit gap is separate. Any tax adjustment depends on verified classification, period and applicable rules.

Alternatives for management discussion

Alternative	Practical rationale	Condition before adoption
Resolve before submission	Produces a supported package	Must respect verified external timing
Document a treatment decision	Makes exceptions explicit	Requires professional review of actual rules
Escalate missing receipts	Addresses completion risk	Requires evidence from authorised external filing

Management should compare the alternatives using verified facts, operational feasibility and the applicable legal analysis. A more favourable numerical scenario is not evidence that its assumptions are valid. The report therefore recommends completing the unresolved work before selecting a final tax position or an external action.

Recommendations and delivery plan

The following sequence is an illustrative internal work plan measured from engagement kick-off. It is not a statutory timetable. Any external response or filing date must be verified separately and may require faster escalation. The engagement partner remains responsible for the scope and resources agreed with the client.

Work step	Responsible role	Indicative timing	Completion evidence
Confirm scope and procedural facts	Engagement lead	Days 1 to 2	Approved scope and verified external date where relevant
Resolve finding 1	Client finance and Falcon adviser	Days 2 to 5	Original evidence and documented resolution or scope limitation
Resolve finding 2	Technical workstream lead	Days 3 to 7	Originals and approved technical treatment
Resolve finding 3	Client owner and Falcon adviser	Days 3 to 8	Reviewed action and completion evidence
Review analysis and computations	Independent Falcon partner	After evidence closure	Documented challenge and approved current version
Authorise delivery and preserve receipts	Engagement lead and client signatory	After professional approval	Final report version and any external acknowledgement

Escalation and change control

Escalate immediately if an actual external date is near, an original contradicts the working facts, the legal framework changes, or the proposed action exceeds the authorised scope. New evidence can change the recommendation. Update the affected calculations, issue analysis and report version, and obtain fresh independent review where the conclusion has changed.

Client communication

Tell the client what is established, what remains uncertain and what they must supply or decide. Explain how missing evidence limits the deliverable. Obtain approval of the final audience and language. Preserve the distinction between internal review, client delivery and authority acceptance.

Technical references and completion record

The official references below were located on 3 October 2026. They are starting points for a real technical review, not a representation that every operative article, amendment, treaty or transitional provision has been checked. No quoted legal passage or current statutory rate is relied on to decide this fictional case.

Indonesian tax administration

PMK 81 of 2024 and amendment history - The JDIH page lists amendment history including PMK 1 of 2026. Retrieve applicable originals and check all later amendments before use.

Open official reference

Employment related withholding

PMK 168 of 2023 - Check the current original framework, subsequent measures, employee facts and any separate treaty questions.

Open official reference

Required legal applicability record

For each material position, retain the original provision and exact article, authority and version, effective dates, relevant amendments and the reason it applies to the client's facts and period. Record competing interpretations and the specialist's conclusion. Official service pages and OECD guidance have different authority from domestic legislation and treaty text.

Independent completion checks

- The client identity, period and authorised scope match the actual engagement.
- Every material statement is traceable to the original record and preserves any contradiction.
- The calculations are independently reperformed and assumptions are distinguished from legal rules.
- The applicable law and source history support the conclusion for the actual period.
- A different qualified Falcon reviewer records the judgement and material limitations.
- The client authorises the intended delivery and any separate external submission is evidenced.

Sample status: not approved for client issue. No preparer, reviewer or client signature is simulated. Replace the fictional dataset and complete the real engagement review before using this document as a delivery model.

TAX HEALTH CHECK

Tax Health Check Report

PT Contoh Teknologi Usaha

FY2025 | Prepared for the fictional management team | 3 October 2026

Executive assessment

Prioritise the related-party service evidence and revenue cut-off controls. The sample review identifies important gaps, but its targeted testing does not support a conclusion that the whole tax population is compliant.

The fictional company has revenue of IDR 250,000 million and 2,400 selected transaction records in the review population. The team inspects 120 records totalling 18,000 million. Fourteen tested records, with value of 2,100 million, contain incomplete documentation or unreconciled classifications.

Priority	Matter requiring a decision	Current evidence position
High	Service support is inconsistent	Open for professional review
Medium	Cut-off control is manual	Open for professional review
Medium	Tax ownership is fragmented	Open for professional review

This is a worked sample, not an issued client opinion. All companies, transactions, evidence records and calculations are fictional. The recommended actions demonstrate professional delivery; they do not establish a tax liability, filing eligibility, benchmark or regulatory approval.

Scope and analytical method

Purpose and intended use

The purpose is to help the fictional management team understand the evidence, the decision still required and the work needed to complete a defensible deliverable. The report is intended for internal discussion with the responsible Falcon professional. It is not a filing, an audit opinion or a guarantee of an authority outcome.

Work performed in the illustrative case

- Corporate income tax and fiscal reconciliation
- VAT and withholding controls
- Related-party and material contract review
- Governance remediation and review limitations

Use a risk-based selection drawn from a defined population, document the basis for each test and reconcile the tested records to original evidence. Assess design and operation of key controls separately. A targeted sample may reveal issues but does not estimate the population error rate without a valid statistical design.

Evidence population

Ref	Illustrative record	Role in the analysis
E01	Review population and trial balance	Starting population and primary bridge
E02	Test selection and workpapers	Classification and factual support
E03	Exception and cut-off register	Exception or corroboration testing
E04	Tax responsibility and approval matrix	Decision history and completion support

The references are report-local training identifiers. They are not verified originals, app record IDs or hashes. No real client files were inspected. A live engagement must preserve the actual originals, their versions and the reviewer's assessment of each material claim. The descriptions above define the evidence that the case assumes or explicitly identifies as missing.

Coverage and limitations

Only the stated sample scope is covered. The report does not infer completeness of other entities, years, transactions or tax types. Where the record is incomplete, the analysis identifies the limitation rather than treating management's explanation as verified evidence. Any estimate remains subject to factual validation, current legal applicability and independent review.

Detailed findings and professional response

Priority is a qualitative judgement about the importance of resolving an issue before delivery. High means that the matter could change a material conclusion or prevent completion. Medium means that a control or corroboration improvement is required. These labels are not a probability of assessment or a calculated tax exposure.

Finding 1 Service support is inconsistent

High priority. E02 contains related-party service entries with incomplete delivery and allocation support.

Professional implication. The documentary gap could affect the legal analysis and makes the internal sign-off unreliable.

Recommended response. Expand testing of the affected service population and assign a finance owner to complete the evidence.

Finding 2 Cut-off control is manual

Medium priority. E03 relies on a spreadsheet with no evidenced independent review of year-end exceptions.

Professional implication. Transactions can fall into inconsistent accounting and reporting periods.

Recommended response. Introduce a reconciled exception log and approval of period treatment supported by originals.

Finding 3 Tax ownership is fragmented

Medium priority. E04 assigns responsibilities across finance and operations without a clear reviewer for tax classification.

Professional implication. An unresolved exception may be passed between teams without a final decision or record.

Recommended response. Define preparation, legal review and approval responsibilities and measure closure of material exceptions.

Counteranalysis and judgement

An incomplete record is not proof that the taxpayer's position is wrong. Equally, an invoice, signed agreement or plausible narrative does not establish every factual or legal element. The reviewer should test alternative explanations and record what evidence would change the assessment. Preserve both supportive and adverse material so that the final conclusion remains balanced.

Financial analysis and decision alternatives

The schedule below makes the numerical reasoning reproducible. All inputs are fictional. The calculation basis states whether a value comes from the assumed record, a formula or an explicit scenario parameter. Figures should not be copied into a live return or used as a benchmark.

Measure	Illustrative result	Calculation basis
Population records	2,400	E01
Tested records	120	E02
Tested record coverage	5.00%	120 divided by 2,400
Tested value	18,000	E02
Exception value within tests	2,100	E03
Exception value within tested value	11.67%	2,100 divided by 18,000

Amounts are IDR million unless labelled as records or percentages. Fourteen of 120 tested records is 11.67%; the value ratio also happens to round to 11.67% in this fictional dataset. Neither ratio is extrapolated to the population. Exception value is not a tax liability and may include overlapping classifications or documentation issues.

Alternatives for management discussion

Alternative	Practical rationale	Condition before adoption
Targeted remediation	Addresses identified exceptions	Leaves untested populations outside assurance
Expand the high-risk review	Tests whether issues recur	Requires a documented selection method
Improve recurring controls	Reduces future handling errors	Needs ownership and evidence of operation

Management should compare the alternatives using verified facts, operational feasibility and the applicable legal analysis. A more favourable numerical scenario is not evidence that its assumptions are valid. The report therefore recommends completing the unresolved work before selecting a final tax position or an external action.

Recommendations and delivery plan

The following sequence is an illustrative internal work plan measured from engagement kick-off. It is not a statutory timetable. Any external response or filing date must be verified separately and may require faster escalation. The engagement partner remains responsible for the scope and resources agreed with the client.

Work step	Responsible role	Indicative timing	Completion evidence
Confirm scope and procedural facts	Engagement lead	Days 1 to 2	Approved scope and verified external date where relevant
Resolve finding 1	Client finance and Falcon adviser	Days 2 to 5	Original evidence and documented resolution or scope limitation
Resolve finding 2	Technical workstream lead	Days 3 to 7	Originals and approved technical treatment
Resolve finding 3	Client owner and Falcon adviser	Days 3 to 8	Reviewed action and completion evidence
Review analysis and computations	Independent Falcon partner	After evidence closure	Documented challenge and approved current version
Authorise delivery and preserve receipts	Engagement lead and client signatory	After professional approval	Final report version and any external acknowledgement

Escalation and change control

Escalate immediately if an actual external date is near, an original contradicts the working facts, the legal framework changes, or the proposed action exceeds the authorised scope. New evidence can change the recommendation. Update the affected calculations, issue analysis and report version, and obtain fresh independent review where the conclusion has changed.

Client communication

Tell the client what is established, what remains uncertain and what they must supply or decide. Explain how missing evidence limits the deliverable. Obtain approval of the final audience and language. Preserve the distinction between internal review, client delivery and authority acceptance.

Technical references and completion record

The official references below were located on 3 October 2026. They are starting points for a real technical review, not a representation that every operative article, amendment, treaty or transitional provision has been checked. No quoted legal passage or current statutory rate is relied on to decide this fictional case.

Indonesian tax administration

PMK 81 of 2024 and amendment history - The JDIH page lists amendment history including PMK 1 of 2026. Retrieve applicable originals and check all later amendments before use.

Open official reference

Indonesian related party transactions

PMK 172 of 2023 - Review the applicable articles, period, documentation, MAP and APA provisions and any subsequent changes.

Open official reference

Employment related withholding

PMK 168 of 2023 - Check the current original framework, subsequent measures, employee facts and any separate treaty questions.

Open official reference

Required legal applicability record

For each material position, retain the original provision and exact article, authority and version, effective dates, relevant amendments and the reason it applies to the client's facts and period. Record competing interpretations and the specialist's conclusion. Official service pages and OECD guidance have different authority from domestic legislation and treaty text.

Independent completion checks

- The client identity, period and authorised scope match the actual engagement.
- Every material statement is traceable to the original record and preserves any contradiction.
- The calculations are independently reperformed and assumptions are distinguished from legal rules.
- The applicable law and source history support the conclusion for the actual period.
- A different qualified Falcon reviewer records the judgement and material limitations.
- The client authorises the intended delivery and any separate external submission is evidenced.

Sample status: not approved for client issue. No preparer, reviewer or client signature is simulated. Replace the fictional dataset and complete the real engagement review before using this document as a delivery model.

VAT AND REFUND

VAT Reconciliation and Refund Readiness

PT Contoh Ekspor Produk

January to September 2026 | Prepared for the fictional management team | 3 October 2026

Executive assessment

Separate arithmetic reconciliation from refund eligibility. The sample supports a provisional net credit of 1,500 million after removing identified duplicates and unmatched entries from the working population, but legal creditability and refund conditions remain unverified.

The fictional exporter records input VAT of IDR 7,200 million and output VAT of 5,400 million. Review identifies 180 million of duplicate input entries and 120 million with no matching invoice record. Export documents exist for selected shipments, but the complete shipment and return linkage has not been assembled.

Priority	Matter requiring a decision	Current evidence position
High	Duplicate input entries need correction	Open for professional review
High	Invoice matching remains incomplete	Open for professional review
High	Refund basis is not yet documented	Open for professional review

This is a worked sample, not an issued client opinion. All companies, transactions, evidence records and calculations are fictional. The recommended actions demonstrate professional delivery; they do not establish a tax liability, filing eligibility, benchmark or regulatory approval.

Scope and analytical method

Purpose and intended use

The purpose is to help the fictional management team understand the evidence, the decision still required and the work needed to complete a defensible deliverable. The report is intended for internal discussion with the responsible Falcon professional. It is not a filing, an audit opinion or a guarantee of an authority outcome.

Work performed in the illustrative case

- Input and output VAT reconciliation
- Invoice identity and period matching
- Export and refund basis evidence
- Refund application and audit readiness

Match the ledger, invoice register and return by document identity, period and amount. Test duplicate entries, cancellations and credit notes. Reconcile export shipments to commercial, customs and payment evidence. Analyse creditability and the relevant refund route using current rules and the actual taxpayer facts.

Evidence population

Ref	Illustrative record	Role in the analysis
E01	VAT ledger and return bridge	Starting population and primary bridge
E02	Duplicate invoice analysis	Classification and factual support
E03	Original invoice matching register	Exception or corroboration testing
E04	Export and refund history pack	Decision history and completion support

The references are report-local training identifiers. They are not verified originals, app record IDs or hashes. No real client files were inspected. A live engagement must preserve the actual originals, their versions and the reviewer's assessment of each material claim. The descriptions above define the evidence that the case assumes or explicitly identifies as missing.

Coverage and limitations

Only the stated sample scope is covered. The report does not infer completeness of other entities, years, transactions or tax types. Where the record is incomplete, the analysis identifies the limitation rather than treating management's explanation as verified evidence. Any estimate remains subject to factual validation, current legal applicability and independent review.

Detailed findings and professional response

Priority is a qualitative judgement about the importance of resolving an issue before delivery. High means that the matter could change a material conclusion or prevent completion. Medium means that a control or corroboration improvement is required. These labels are not a probability of assessment or a calculated tax exposure.

Finding 1 Duplicate input entries need correction

High priority. E02 identifies 180 million recorded twice in the working input population.

Professional implication. The provisional credit is overstated unless the duplicate is resolved.

Recommended response. Confirm the original identity and correct the working ledger with an approved audit trail.

Finding 2 Invoice matching remains incomplete

High priority. E03 identifies 120 million without a matching original invoice entry.

Professional implication. The sample does not establish whether these entries are valid, incorrectly timed or unsupported.

Recommended response. Recover and verify originals, cancellation status and period treatment before including them.

Finding 3 Refund basis is not yet documented

High priority. E04 contains selected export evidence but no complete eligibility analysis or shipment-to-return bridge.

Professional implication. A net credit does not itself establish entitlement to a cash refund or a particular processing route.

Recommended response. Complete the legal applicability memorandum and index the supporting exports and return history.

Counteranalysis and judgement

An incomplete record is not proof that the taxpayer's position is wrong. Equally, an invoice, signed agreement or plausible narrative does not establish every factual or legal element. The reviewer should test alternative explanations and record what evidence would change the assessment. Preserve both supportive and adverse material so that the final conclusion remains balanced.

Financial analysis and decision alternatives

The schedule below makes the numerical reasoning reproducible. All inputs are fictional. The calculation basis states whether a value comes from the assumed record, a formula or an explicit scenario parameter. Figures should not be copied into a live return or used as a benchmark.

Measure	Illustrative result	Calculation basis
Recorded input VAT	7,200	E01
Recorded output VAT	5,400	E01
Unadjusted net credit	1,800	7,200 minus 5,400
Duplicate entries	180	E02
Unmatched entries	120	E03
Provisional credit for review	1,500	1,800 minus 180 minus 120

Amounts are IDR million and are fictional VAT balances, not transaction values multiplied by an assumed rate. Removing the unmatched amount is a conservative working scenario rather than a final legal denial. If authentic support is recovered, treatment must be reconsidered. Timing of refund receipts is excluded from the base cash plan until the route and status are verified.

Alternatives for management discussion

Alternative	Practical rationale	Condition before adoption
Correct the reconciliation first	Establishes an accurate population	Does not establish refund entitlement
Assess the available refund route	Connects facts with legal conditions	Requires current rules and taxpayer status
Prepare an audit evidence pack	Improves traceability of the claim	Does not guarantee acceptance or timing

Management should compare the alternatives using verified facts, operational feasibility and the applicable legal analysis. A more favourable numerical scenario is not evidence that its assumptions are valid. The report therefore recommends completing the unresolved work before selecting a final tax position or an external action.

Recommendations and delivery plan

The following sequence is an illustrative internal work plan measured from engagement kick-off. It is not a statutory timetable. Any external response or filing date must be verified separately and may require faster escalation. The engagement partner remains responsible for the scope and resources agreed with the client.

Work step	Responsible role	Indicative timing	Completion evidence
Confirm scope and procedural facts	Engagement lead	Days 1 to 2	Approved scope and verified external date where relevant
Resolve finding 1	Client finance and Falcon adviser	Days 2 to 5	Original evidence and documented resolution or scope limitation
Resolve finding 2	Technical workstream lead	Days 3 to 7	Originals and approved technical treatment
Resolve finding 3	Client owner and Falcon adviser	Days 3 to 8	Reviewed action and completion evidence
Review analysis and computations	Independent Falcon partner	After evidence closure	Documented challenge and approved current version
Authorise delivery and preserve receipts	Engagement lead and client signatory	After professional approval	Final report version and any external acknowledgement

Escalation and change control

Escalate immediately if an actual external date is near, an original contradicts the working facts, the legal framework changes, or the proposed action exceeds the authorised scope. New evidence can change the recommendation. Update the affected calculations, issue analysis and report version, and obtain fresh independent review where the conclusion has changed.

Client communication

Tell the client what is established, what remains uncertain and what they must supply or decide. Explain how missing evidence limits the deliverable. Obtain approval of the final audience and language. Preserve the distinction between internal review, client delivery and authority acceptance.

Technical references and completion record

The official references below were located on 3 October 2026. They are starting points for a real technical review, not a representation that every operative article, amendment, treaty or transitional provision has been checked. No quoted legal passage or current statutory rate is relied on to decide this fictional case.

Indonesian tax administration

PMK 81 of 2024 and amendment history - The JDIH page lists amendment history including PMK 1 of 2026. Retrieve applicable originals and check all later amendments before use.

Open official reference

Import administration starting point

Directorate General of Customs and Excise import guidance - Service guidance does not determine the product code, valuation, origin, exchange rate or tariff for a shipment.

Open official reference

Required legal applicability record

For each material position, retain the original provision and exact article, authority and version, effective dates, relevant amendments and the reason it applies to the client's facts and period. Record competing interpretations and the specialist's conclusion. Official service pages and OECD guidance have different authority from domestic legislation and treaty text.

Independent completion checks

- The client identity, period and authorised scope match the actual engagement.
- Every material statement is traceable to the original record and preserves any contradiction.
- The calculations are independently reperformed and assumptions are distinguished from legal rules.
- The applicable law and source history support the conclusion for the actual period.
- A different qualified Falcon reviewer records the judgement and material limitations.
- The client authorises the intended delivery and any separate external submission is evidenced.

Sample status: not approved for client issue. No preparer, reviewer or client signature is simulated. Replace the fictional dataset and complete the real engagement review before using this document as a delivery model.

PAYROLL AND EXPATRIATE

Payroll and Expatriate Tax Review

PT Contoh Tenaga Global

FY2025 | Prepared for the fictional management team | 3 October 2026

Executive assessment

Complete the employee compensation bridge and expatriate fact records before validating withholding. The sample identifies 1,200 million of gross-pay differences; it does not establish the statutory calculation or residency treatment of any employee.

The fictional workforce comprises 120 local employees and eight inbound assignees. The HR compensation register records IDR 18,000 million, while the payroll taxable-pay register contains 16,800 million. The difference comprises 800 million of allowances and 400 million of offshore-paid compensation.

Priority	Matter requiring a decision	Current evidence position
High	Allowances are not consistently classified	Open for professional review
High	Offshore compensation is outside the local feed	Open for professional review
High	Residency evidence is incomplete	Open for professional review

This is a worked sample, not an issued client opinion. All companies, transactions, evidence records and calculations are fictional. The recommended actions demonstrate professional delivery; they do not establish a tax liability, filing eligibility, benchmark or regulatory approval.

Scope and analytical method

Purpose and intended use

The purpose is to help the fictional management team understand the evidence, the decision still required and the work needed to complete a defensible deliverable. The report is intended for internal discussion with the responsible Falcon professional. It is not a filing, an audit opinion or a guarantee of an authority outcome.

Work performed in the illustrative case

- Payroll and compensation reconciliation
- Employee tax and personal fact records
- Expatriate assignment and offshore compensation
- Year-end adjustment and certificate controls

Reconcile HR, payroll, general ledger and offshore compensation populations. For each relevant person, establish the actual facts supporting residency and employment treatment; nationality or a job title is not enough. Reperform the applicable withholding method only after verifying classification, period and employee data.

Evidence population

Ref	Illustrative record	Role in the analysis
E01	HR compensation and allowance register	Starting population and primary bridge
E02	Payroll calculation and withholding register	Classification and factual support
E03	Offshore compensation schedule	Exception or corroboration testing
E04	Assignment and travel fact records	Decision history and completion support

The references are report-local training identifiers. They are not verified originals, app record IDs or hashes. No real client files were inspected. A live engagement must preserve the actual originals, their versions and the reviewer's assessment of each material claim. The descriptions above define the evidence that the case assumes or explicitly identifies as missing.

Coverage and limitations

Only the stated sample scope is covered. The report does not infer completeness of other entities, years, transactions or tax types. Where the record is incomplete, the analysis identifies the limitation rather than treating management's explanation as verified evidence. Any estimate remains subject to factual validation, current legal applicability and independent review.

Detailed findings and professional response

Priority is a qualitative judgement about the importance of resolving an issue before delivery. High means that the matter could change a material conclusion or prevent completion. Medium means that a control or corroboration improvement is required. These labels are not a probability of assessment or a calculated tax exposure.

Finding 1 Allowances are not consistently classified

High priority. E01 includes 800 million of allowances missing from E02's taxable-pay register.

Professional implication. The difference could reflect a valid classification or an omitted compensation component.

Recommended response. Review allowance terms, beneficiaries and current rules, then document the employee-level treatment.

Finding 2 Offshore compensation is outside the local feed

High priority. E03 records 400 million of assignee compensation without a local payroll reconciliation.

Professional implication. The company lacks a complete view of remuneration connected with the assignment.

Recommended response. Establish a recurring offshore compensation feed and assess the actual Indonesian treatment.

Finding 3 Residency evidence is incomplete

High priority. E04 contains assignment dates but no complete travel, domicile or treaty fact review.

Professional implication. A blanket expatriate classification could apply the wrong framework to individuals.

Recommended response. Prepare person-specific factual records and obtain specialist review of residence and treaty questions.

Counteranalysis and judgement

An incomplete record is not proof that the taxpayer's position is wrong. Equally, an invoice, signed agreement or plausible narrative does not establish every factual or legal element. The reviewer should test alternative explanations and record what evidence would change the assessment. Preserve both supportive and adverse material so that the final conclusion remains balanced.

Financial analysis and decision alternatives

The schedule below makes the numerical reasoning reproducible. All inputs are fictional. The calculation basis states whether a value comes from the assumed record, a formula or an explicit scenario parameter. Figures should not be copied into a live return or used as a benchmark.

Measure	Illustrative result	Calculation basis
HR compensation register	18,000	E01
Payroll taxable-pay register	16,800	E02
Reconciliation difference	1,200	18,000 minus 16,800
Allowance component	800	E01
Offshore component	400	E03

Amounts are IDR million. The 1,200 million difference equals 800 plus 400 million. It is not an underwithheld tax figure because the employee allocation, taxable treatment, applicable computation and prior withholding are not established. A person-by-person review should distinguish cash pay, benefits, reimbursements and offshore compensation.

Alternatives for management discussion

Alternative	Practical rationale	Condition before adoption
Correct the compensation feed	Establishes a complete population	Classification remains subject to review
Perform employee-level calculations	Tests withholding once facts are complete	Requires current method and personal data
Introduce assignment controls	Improves ongoing visibility	Needs privacy and secure data access

Management should compare the alternatives using verified facts, operational feasibility and the applicable legal analysis. A more favourable numerical scenario is not evidence that its assumptions are valid. The report therefore recommends completing the unresolved work before selecting a final tax position or an external action.

Recommendations and delivery plan

The following sequence is an illustrative internal work plan measured from engagement kick-off. It is not a statutory timetable. Any external response or filing date must be verified separately and may require faster escalation. The engagement partner remains responsible for the scope and resources agreed with the client.

Work step	Responsible role	Indicative timing	Completion evidence
Confirm scope and procedural facts	Engagement lead	Days 1 to 2	Approved scope and verified external date where relevant
Resolve finding 1	Client finance and Falcon adviser	Days 2 to 5	Original evidence and documented resolution or scope limitation
Resolve finding 2	Technical workstream lead	Days 3 to 7	Originals and approved technical treatment
Resolve finding 3	Client owner and Falcon adviser	Days 3 to 8	Reviewed action and completion evidence
Review analysis and computations	Independent Falcon partner	After evidence closure	Documented challenge and approved current version
Authorise delivery and preserve receipts	Engagement lead and client signatory	After professional approval	Final report version and any external acknowledgement

Escalation and change control

Escalate immediately if an actual external date is near, an original contradicts the working facts, the legal framework changes, or the proposed action exceeds the authorised scope. New evidence can change the recommendation. Update the affected calculations, issue analysis and report version, and obtain fresh independent review where the conclusion has changed.

Client communication

Tell the client what is established, what remains uncertain and what they must supply or decide. Explain how missing evidence limits the deliverable. Obtain approval of the final audience and language. Preserve the distinction between internal review, client delivery and authority acceptance.

Technical references and completion record

The official references below were located on 3 October 2026. They are starting points for a real technical review, not a representation that every operative article, amendment, treaty or transitional provision has been checked. No quoted legal passage or current statutory rate is relied on to decide this fictional case.

Employment related withholding

PMK 168 of 2023 - Check the current original framework, subsequent measures, employee facts and any separate treaty questions.

Open official reference

Indonesian tax administration

PMK 81 of 2024 and amendment history - The JDIH page lists amendment history including PMK 1 of 2026. Retrieve applicable originals and check all later amendments before use.

Open official reference

Required legal applicability record

For each material position, retain the original provision and exact article, authority and version, effective dates, relevant amendments and the reason it applies to the client's facts and period. Record competing interpretations and the specialist's conclusion. Official service pages and OECD guidance have different authority from domestic legislation and treaty text.

Independent completion checks

- The client identity, period and authorised scope match the actual engagement.
- Every material statement is traceable to the original record and preserves any contradiction.
- The calculations are independently reperformed and assumptions are distinguished from legal rules.
- The applicable law and source history support the conclusion for the actual period.
- A different qualified Falcon reviewer records the judgement and material limitations.
- The client authorises the intended delivery and any separate external submission is evidenced.

Sample status: not approved for client issue. No preparer, reviewer or client signature is simulated. Replace the fictional dataset and complete the real engagement review before using this document as a delivery model.

M AND A DUE DILIGENCE

Mergers and Acquisitions Tax Due Diligence

PT Contoh Akuisisi Industri

FY2023 to FY2025 | Prepared for the fictional management team | 3 October 2026

Executive assessment

Do not treat the proposed purchase price as tax-risk adjusted until the identified items have been tested and allocated in the transaction documents. The sample contains 1,700 million of exposure scenarios, with no probability weighting or representation that the amount will become payable.

The fictional buyer proposes an equity acquisition at IDR 100,000 million. The data room contains returns and ledgers but incomplete service support, selected VAT invoices and an unresolved dispute file. Management estimates potential exposure scenarios of 1,000, 500 and 200 million across three distinct matters.

Priority	Matter requiring a decision	Current evidence position
High	Service evidence could affect historical positions	Open for professional review
Medium	VAT documentation needs targeted testing	Open for professional review
High	Open dispute requires transaction allocation	Open for professional review

This is a worked sample, not an issued client opinion. All companies, transactions, evidence records and calculations are fictional. The recommended actions demonstrate professional delivery; they do not establish a tax liability, filing eligibility, benchmark or regulatory approval.

Scope and analytical method

Purpose and intended use

The purpose is to help the fictional management team understand the evidence, the decision still required and the work needed to complete a defensible deliverable. The report is intended for internal discussion with the responsible Falcon professional. It is not a filing, an audit opinion or a guarantee of an authority outcome.

Work performed in the illustrative case

- Historical returns and tax balances
- Material exposures and disputes
- Transaction structure and purchase agreement implications
- Post-completion integration priorities

Define the periods, entities and tax types reviewed, reconcile returns to accounts, and inspect material positions and open disputes. Distinguish recurring operational weaknesses from historical liabilities. Coordinate tax findings with the financial diligence and legal teams so that price, indemnities and completion mechanics do not count the same item twice.

Evidence population

Ref	Illustrative record	Role in the analysis
E01	Transaction terms and tax population	Starting population and primary bridge
E02	Related-party service workpapers	Classification and factual support
E03	VAT invoice and correction register	Exception or corroboration testing
E04	Open dispute and payment record	Decision history and completion support

The references are report-local training identifiers. They are not verified originals, app record IDs or hashes. No real client files were inspected. A live engagement must preserve the actual originals, their versions and the reviewer's assessment of each material claim. The descriptions above define the evidence that the case assumes or explicitly identifies as missing.

Coverage and limitations

Only the stated sample scope is covered. The report does not infer completeness of other entities, years, transactions or tax types. Where the record is incomplete, the analysis identifies the limitation rather than treating management's explanation as verified evidence. Any estimate remains subject to factual validation, current legal applicability and independent review.

Detailed findings and professional response

Priority is a qualitative judgement about the importance of resolving an issue before delivery. High means that the matter could change a material conclusion or prevent completion. Medium means that a control or corroboration improvement is required. These labels are not a probability of assessment or a calculated tax exposure.

Finding 1 Service evidence could affect historical positions

High priority. E02 lacks complete support for recurring related-party charges. Management supplies a 1,000 million exposure scenario.

Professional implication. The scenario is not a verified liability and may overlap with a separate dispute or fiscal adjustment.

Recommended response. Expand testing and reconcile the estimate to years and positions. Seek a specific protection where supported.

Finding 2 VAT documentation needs targeted testing

Medium priority. E03 identifies selected unmatched invoices associated with a 500 million scenario.

Professional implication. Recovery or additional payment depends on the original records and legal treatment.

Recommended response. Verify originals, reporting periods and whether corrections were already made.

Finding 3 Open dispute requires transaction allocation

High priority. E04 includes a 200 million dispute scenario but no complete procedural and payment history.

Professional implication. Responsibility for conducting the dispute and receiving or funding its outcome must be clear.

Recommended response. Review the operative documents and agree transaction protections with counsel.

Counteranalysis and judgement

An incomplete record is not proof that the taxpayer's position is wrong. Equally, an invoice, signed agreement or plausible narrative does not establish every factual or legal element. The reviewer should test alternative explanations and record what evidence would change the assessment. Preserve both supportive and adverse material so that the final conclusion remains balanced.

Financial analysis and decision alternatives

The schedule below makes the numerical reasoning reproducible. All inputs are fictional. The calculation basis states whether a value comes from the assumed record, a formula or an explicit scenario parameter. Figures should not be copied into a live return or used as a benchmark.

Measure	Illustrative result	Calculation basis
Proposed equity price	100,000	E01
Service scenario	1,000	E02
VAT scenario	500	E03
Dispute scenario	200	E04
Unweighted scenario total	1,700	1,000 plus 500 plus 200
Scenario total relative to price	1.70%	1,700 divided by 100,000

Amounts are IDR million. The 1.70% ratio is a presentation metric, not a recommended price discount. The total assumes the matters are distinct and excludes penalties, interest, recoveries and probability weights. Validate that assumption before aggregation. An escrow amount should reflect the agreed risk allocation and legal mechanics rather than this ratio alone.

Alternatives for management discussion

Alternative	Practical rationale	Condition before adoption
Specific indemnity	Allocates identified historical matters	Enforceability and scope need counsel
Escrow or retention	Provides an agreed funding mechanism	Amount and release conditions need negotiation
Pre-completion remediation	May improve the record	Must preserve disclosure and transaction timing

Management should compare the alternatives using verified facts, operational feasibility and the applicable legal analysis. A more favourable numerical scenario is not evidence that its assumptions are valid. The report therefore recommends completing the unresolved work before selecting a final tax position or an external action.

Recommendations and delivery plan

The following sequence is an illustrative internal work plan measured from engagement kick-off. It is not a statutory timetable. Any external response or filing date must be verified separately and may require faster escalation. The engagement partner remains responsible for the scope and resources agreed with the client.

Work step	Responsible role	Indicative timing	Completion evidence
Confirm scope and procedural facts	Engagement lead	Days 1 to 2	Approved scope and verified external date where relevant
Resolve finding 1	Client finance and Falcon adviser	Days 2 to 5	Original evidence and documented resolution or scope limitation
Resolve finding 2	Technical workstream lead	Days 3 to 7	Originals and approved technical treatment
Resolve finding 3	Client owner and Falcon adviser	Days 3 to 8	Reviewed action and completion evidence
Review analysis and computations	Independent Falcon partner	After evidence closure	Documented challenge and approved current version
Authorise delivery and preserve receipts	Engagement lead and client signatory	After professional approval	Final report version and any external acknowledgement

Escalation and change control

Escalate immediately if an actual external date is near, an original contradicts the working facts, the legal framework changes, or the proposed action exceeds the authorised scope. New evidence can change the recommendation. Update the affected calculations, issue analysis and report version, and obtain fresh independent review where the conclusion has changed.

Client communication

Tell the client what is established, what remains uncertain and what they must supply or decide. Explain how missing evidence limits the deliverable. Obtain approval of the final audience and language. Preserve the distinction between internal review, client delivery and authority acceptance.

Technical references and completion record

The official references below were located on 3 October 2026. They are starting points for a real technical review, not a representation that every operative article, amendment, treaty or transitional provision has been checked. No quoted legal passage or current statutory rate is relied on to decide this fictional case.

Indonesian tax administration

PMK 81 of 2024 and amendment history - The JDIH page lists amendment history including PMK 1 of 2026. Retrieve applicable originals and check all later amendments before use.

Open official reference

Indonesian related party transactions

PMK 172 of 2023 - Review the applicable articles, period, documentation, MAP and APA provisions and any subsequent changes.

Open official reference

Tax examination framework

PMK 15 of 2025 - Check applicability, transition and actual audit documents. This is not a source for an assumed SP2DK deadline.

Open official reference

Required legal applicability record

For each material position, retain the original provision and exact article, authority and version, effective dates, relevant amendments and the reason it applies to the client's facts and period. Record competing interpretations and the specialist's conclusion. Official service pages and OECD guidance have different authority from domestic legislation and treaty text.

Independent completion checks

- The client identity, period and authorised scope match the actual engagement.
- Every material statement is traceable to the original record and preserves any contradiction.
- The calculations are independently reperformed and assumptions are distinguished from legal rules.
- The applicable law and source history support the conclusion for the actual period.
- A different qualified Falcon reviewer records the judgement and material limitations.
- The client authorises the intended delivery and any separate external submission is evidenced.

Sample status: not approved for client issue. No preparer, reviewer or client signature is simulated. Replace the fictional dataset and complete the real engagement review before using this document as a delivery model.

INTERNATIONAL ADVISORY

International Structuring Advisory

Contoh Regional Expansion Group

Proposed 2027 operating model | Prepared for the fictional management team | 3 October 2026

Executive assessment

Compare the operating substance and execution cost of the proposed alternatives before modelling tax benefits. In the sample, a regional entity model costs 900 million more per year than direct export; no treaty benefit or permanent establishment conclusion has been established.

The fictional group plans regional sales of IDR 40,000 million. It compares direct export with a regional commercial entity. Forecast contribution before operating costs is 12,000 million in each model. Operating costs are 1,000 million for direct export and 1,900 million for the regional entity.

Priority	Matter requiring a decision	Current evidence position
High	Decision location is undefined	Open for professional review
High	Treaty assumptions are unsupported	Open for professional review
Medium	Pricing model has not been delineated	Open for professional review

This is a worked sample, not an issued client opinion. All companies, transactions, evidence records and calculations are fictional. The recommended actions demonstrate professional delivery; they do not establish a tax liability, filing eligibility, benchmark or regulatory approval.

Scope and analytical method

Purpose and intended use

The purpose is to help the fictional management team understand the evidence, the decision still required and the work needed to complete a defensible deliverable. The report is intended for internal discussion with the responsible Falcon professional. It is not a filing, an audit opinion or a guarantee of an authority outcome.

Work performed in the illustrative case

- Business purpose and operating model
- Entity substance and decision rights
- Treaty permanent establishment and withholding questions
- Transfer pricing and implementation dependencies

Start with the commercial flow, personnel, contractual rights and actual decision locations. Map potential domestic and treaty questions in each jurisdiction. Model operating economics separately from tax, then apply only verified jurisdiction-specific assumptions. Compare implementation effort and governance alongside forecast cash outcomes.

Evidence population

Ref	Illustrative record	Role in the analysis
E01	Commercial forecast and costs	Starting population and primary bridge
E02	Proposed operating and decision model	Classification and factual support
E03	Jurisdiction and treaty research register	Exception or corroboration testing
E04	Intercompany transaction design	Decision history and completion support

The references are report-local training identifiers. They are not verified originals, app record IDs or hashes. No real client files were inspected. A live engagement must preserve the actual originals, their versions and the reviewer's assessment of each material claim. The descriptions above define the evidence that the case assumes or explicitly identifies as missing.

Coverage and limitations

Only the stated sample scope is covered. The report does not infer completeness of other entities, years, transactions or tax types. Where the record is incomplete, the analysis identifies the limitation rather than treating management's explanation as verified evidence. Any estimate remains subject to factual validation, current legal applicability and independent review.

Detailed findings and professional response

Priority is a qualitative judgement about the importance of resolving an issue before delivery. High means that the matter could change a material conclusion or prevent completion. Medium means that a control or corroboration improvement is required. These labels are not a probability of assessment or a calculated tax exposure.

Finding 1 Decision location is undefined

High priority. E02 proposes a regional entity but retains pricing approval and contract decisions with the Indonesian team.

Professional implication. The proposed legal structure may not reflect the intended commercial substance.

Recommended response. Document decision rights, staff, assets and operational budgets before evaluating tax outcomes.

Finding 2 Treaty assumptions are unsupported

High priority. E03 assumes favourable withholding without a verified treaty and eligibility memorandum.

Professional implication. A headline treaty rate cannot be inserted into the model as an assured result.

Recommended response. Verify the actual treaty, residence, beneficial ownership and other applicable conditions.

Finding 3 Pricing model has not been delineated

Medium priority. E04 does not define the regional entity's services or risk-bearing role.

Professional implication. Intercompany remuneration cannot be selected from the preferred tax outcome.

Recommended response. Prepare a functional analysis and transaction-specific pricing assessment.

Counteranalysis and judgement

An incomplete record is not proof that the taxpayer's position is wrong. Equally, an invoice, signed agreement or plausible narrative does not establish every factual or legal element. The reviewer should test alternative explanations and record what evidence would change the assessment. Preserve both supportive and adverse material so that the final conclusion remains balanced.

Financial analysis and decision alternatives

The schedule below makes the numerical reasoning reproducible. All inputs are fictional. The calculation basis states whether a value comes from the assumed record, a formula or an explicit scenario parameter. Figures should not be copied into a live return or used as a benchmark.

Measure	Illustrative result	Calculation basis
Forecast contribution before operating costs	12,000	E01
Direct export operating cost	1,000	E01
Direct export contribution after costs	11,000	12,000 minus 1,000
Regional entity operating cost	1,900	E01
Regional entity contribution after costs	10,100	12,000 minus 1,900
Incremental annual operating cost	900	1,900 minus 1,000

Amounts are IDR million. These are pre-tax operating scenarios, not after-tax cash forecasts. The regional model would require a separate commercial benefit or verified tax outcome sufficient to justify its incremental cost. No conclusion about residence, permanent establishment, treaty relief or local licensing is drawn from the numerical comparison.

Alternatives for management discussion

Alternative	Practical rationale	Condition before adoption
Direct export	Lower sample operating cost	Market and contract limitations need review
Regional commercial entity	Potentially supports local activity	Requires real substance and governance
Phased expansion	Tests demand before full investment	Interim tax and contracting risks still need review

Management should compare the alternatives using verified facts, operational feasibility and the applicable legal analysis. A more favourable numerical scenario is not evidence that its assumptions are valid. The report therefore recommends completing the unresolved work before selecting a final tax position or an external action.

Recommendations and delivery plan

The following sequence is an illustrative internal work plan measured from engagement kick-off. It is not a statutory timetable. Any external response or filing date must be verified separately and may require faster escalation. The engagement partner remains responsible for the scope and resources agreed with the client.

Work step	Responsible role	Indicative timing	Completion evidence
Confirm scope and procedural facts	Engagement lead	Days 1 to 2	Approved scope and verified external date where relevant
Resolve finding 1	Client finance and Falcon adviser	Days 2 to 5	Original evidence and documented resolution or scope limitation
Resolve finding 2	Technical workstream lead	Days 3 to 7	Originals and approved technical treatment
Resolve finding 3	Client owner and Falcon adviser	Days 3 to 8	Reviewed action and completion evidence
Review analysis and computations	Independent Falcon partner	After evidence closure	Documented challenge and approved current version
Authorise delivery and preserve receipts	Engagement lead and client signatory	After professional approval	Final report version and any external acknowledgement

Escalation and change control

Escalate immediately if an actual external date is near, an original contradicts the working facts, the legal framework changes, or the proposed action exceeds the authorised scope. New evidence can change the recommendation. Update the affected calculations, issue analysis and report version, and obtain fresh independent review where the conclusion has changed.

Client communication

Tell the client what is established, what remains uncertain and what they must supply or decide. Explain how missing evidence limits the deliverable. Obtain approval of the final audience and language. Preserve the distinction between internal review, client delivery and authority acceptance.

Technical references and completion record

The official references below were located on 3 October 2026. They are starting points for a real technical review, not a representation that every operative article, amendment, treaty or transitional provision has been checked. No quoted legal passage or current statutory rate is relied on to decide this fictional case.

Indonesian related party transactions

PMK 172 of 2023 - Review the applicable articles, period, documentation, MAP and APA provisions and any subsequent changes.

Open official reference

Transfer pricing analytical framework

OECD Transfer Pricing Guidelines 2022 - Analytical guidance is not a substitute for Indonesian law, treaty text or later relevant guidance.

Open official reference

Indonesian tax administration

PMK 81 of 2024 and amendment history - The JDIH page lists amendment history including PMK 1 of 2026. Retrieve applicable originals and check all later amendments before use.

Open official reference

Required legal applicability record

For each material position, retain the original provision and exact article, authority and version, effective dates, relevant amendments and the reason it applies to the client's facts and period. Record competing interpretations and the specialist's conclusion. Official service pages and OECD guidance have different authority from domestic legislation and treaty text.

Independent completion checks

- The client identity, period and authorised scope match the actual engagement.
- Every material statement is traceable to the original record and preserves any contradiction.
- The calculations are independently reperformed and assumptions are distinguished from legal rules.
- The applicable law and source history support the conclusion for the actual period.
- A different qualified Falcon reviewer records the judgement and material limitations.
- The client authorises the intended delivery and any separate external submission is evidenced.

Sample status: not approved for client issue. No preparer, reviewer or client signature is simulated. Replace the fictional dataset and complete the real engagement review before using this document as a delivery model.

INCENTIVES

Tax Incentive Feasibility Report

PT Contoh Investasi Energi

Proposed 2027 investment | Prepared for the fictional management team | 3 October 2026

Executive assessment

Exclude the prospective incentive from the committed investment case until eligibility and approval conditions are established. The illustrative benefit has a positive discounted value, but it is not an entitlement or an approved saving.

The fictional project has capital expenditure of IDR 50,000 million. Management models a tax cash benefit of 2,000 million at the end of each of five years, with an 8% annual discount rate and 300 million of upfront application and compliance cost. Sector, investment, ownership and implementation eligibility have not been confirmed.

Priority	Matter requiring a decision	Current evidence position
High	Eligibility facts are incomplete	Open for professional review
High	Approval is assumed in the forecast	Open for professional review
Medium	Continuing conditions have no owner	Open for professional review

This is a worked sample, not an issued client opinion. All companies, transactions, evidence records and calculations are fictional. The recommended actions demonstrate professional delivery; they do not establish a tax liability, filing eligibility, benchmark or regulatory approval.

Scope and analytical method

Purpose and intended use

The purpose is to help the fictional management team understand the evidence, the decision still required and the work needed to complete a defensible deliverable. The report is intended for internal discussion with the responsible Falcon professional. It is not a filing, an audit opinion or a guarantee of an authority outcome.

Work performed in the illustrative case

- Investment and activity eligibility
- Approval process and documentation
- Benefit modelling and sensitivity
- Continuing conditions and monitoring

Establish the precise incentive requested, the taxpayer and project facts, and the current legal and administrative basis. Separate application, approval and continuing compliance requirements. Evaluate a no-incentive base case and an explicitly conditional benefit case; do not use a generic savings assumption as proof of eligibility.

Evidence population

Ref	Illustrative record	Role in the analysis
E01	Investment cash flow and cost model	Starting population and primary bridge
E02	Activity and qualifying project fact pack	Classification and factual support
E03	Application and approval status record	Exception or corroboration testing
E04	Continuing conditions responsibility register	Decision history and completion support

The references are report-local training identifiers. They are not verified originals, app record IDs or hashes. No real client files were inspected. A live engagement must preserve the actual originals, their versions and the reviewer's assessment of each material claim. The descriptions above define the evidence that the case assumes or explicitly identifies as missing.

Coverage and limitations

Only the stated sample scope is covered. The report does not infer completeness of other entities, years, transactions or tax types. Where the record is incomplete, the analysis identifies the limitation rather than treating management's explanation as verified evidence. Any estimate remains subject to factual validation, current legal applicability and independent review.

Detailed findings and professional response

Priority is a qualitative judgement about the importance of resolving an issue before delivery. High means that the matter could change a material conclusion or prevent completion. Medium means that a control or corroboration improvement is required. These labels are not a probability of assessment or a calculated tax exposure.

Finding 1 Eligibility facts are incomplete

High priority. E02 describes the project commercially but lacks verified activity classification and qualifying investment analysis.

Professional implication. The model could value a benefit unavailable to the project.

Recommended response. Review the actual scheme, sector, investment and taxpayer conditions before changing the committed case.

Finding 2 Approval is assumed in the forecast

High priority. E01 includes benefit receipts despite E03 having no approval or application record.

Professional implication. The investment decision may rely on an unearned fiscal benefit.

Recommended response. Maintain a base case excluding benefits and a conditional case with transparent assumptions.

Finding 3 Continuing conditions have no owner

Medium priority. E04 does not assign responsibility for required monitoring and reports.

Professional implication. Even a granted incentive may create continuing compliance and possible recapture questions.

Recommended response. Create a condition register, reporting calendar and escalation process after legal verification.

Counteranalysis and judgement

An incomplete record is not proof that the taxpayer's position is wrong. Equally, an invoice, signed agreement or plausible narrative does not establish every factual or legal element. The reviewer should test alternative explanations and record what evidence would change the assessment. Preserve both supportive and adverse material so that the final conclusion remains balanced.

Financial analysis and decision alternatives

The schedule below makes the numerical reasoning reproducible. All inputs are fictional. The calculation basis states whether a value comes from the assumed record, a formula or an explicit scenario parameter. Figures should not be copied into a live return or used as a benchmark.

Measure	Illustrative result	Calculation basis
Capital expenditure	50,000	E01
Annual conditional benefit	2,000	Model assumption
Nominal five-year benefit	10,000	2,000 multiplied by 5
Present value of benefits	7,985.42	Year-end cash flows discounted at assumed 8%
Upfront compliance cost	300	E01
Net conditional benefit value	7,685.42	7,985.42 minus 300

Amounts are IDR million. Present value is the sum of 2,000 divided by 1.08 to powers one through five. The discount rate and benefit are management assumptions, not statutory rates or an incentive ruling. The model excludes the project's operating cash flows, recapture, tax interactions and any global minimum tax consequences; it is not a complete project valuation.

Alternatives for management discussion

Alternative	Practical rationale	Condition before adoption
No-incentive base case	Avoids dependence on unapproved relief	May understate a later verified benefit
Conditional incentive case	Makes potential value visible	Requires evidence and approval assumptions
Stage the application work	Limits initial spending	Must be compatible with actual scheme timing

Management should compare the alternatives using verified facts, operational feasibility and the applicable legal analysis. A more favourable numerical scenario is not evidence that its assumptions are valid. The report therefore recommends completing the unresolved work before selecting a final tax position or an external action.

Recommendations and delivery plan

The following sequence is an illustrative internal work plan measured from engagement kick-off. It is not a statutory timetable. Any external response or filing date must be verified separately and may require faster escalation. The engagement partner remains responsible for the scope and resources agreed with the client.

Work step	Responsible role	Indicative timing	Completion evidence
Confirm scope and procedural facts	Engagement lead	Days 1 to 2	Approved scope and verified external date where relevant
Resolve finding 1	Client finance and Falcon adviser	Days 2 to 5	Original evidence and documented resolution or scope limitation
Resolve finding 2	Technical workstream lead	Days 3 to 7	Originals and approved technical treatment
Resolve finding 3	Client owner and Falcon adviser	Days 3 to 8	Reviewed action and completion evidence
Review analysis and computations	Independent Falcon partner	After evidence closure	Documented challenge and approved current version
Authorise delivery and preserve receipts	Engagement lead and client signatory	After professional approval	Final report version and any external acknowledgement

Escalation and change control

Escalate immediately if an actual external date is near, an original contradicts the working facts, the legal framework changes, or the proposed action exceeds the authorised scope. New evidence can change the recommendation. Update the affected calculations, issue analysis and report version, and obtain fresh independent review where the conclusion has changed.

Client communication

Tell the client what is established, what remains uncertain and what they must supply or decide. Explain how missing evidence limits the deliverable. Obtain approval of the final audience and language. Preserve the distinction between internal review, client delivery and authority acceptance.

Technical references and completion record

The official references below were located on 3 October 2026. They are starting points for a real technical review, not a representation that every operative article, amendment, treaty or transitional provision has been checked. No quoted legal passage or current statutory rate is relied on to decide this fictional case.

Indonesian tax administration

PMK 81 of 2024 and amendment history - The JDIH page lists amendment history including PMK 1 of 2026. Retrieve applicable originals and check all later amendments before use.

Open official reference

Indonesian global minimum tax framework

PMK 136 of 2024 - Review current applicability, computation, transition, later changes and relevant international guidance for the actual period.

Open official reference

Required legal applicability record

For each material position, retain the original provision and exact article, authority and version, effective dates, relevant amendments and the reason it applies to the client's facts and period. Record competing interpretations and the specialist's conclusion. Official service pages and OECD guidance have different authority from domestic legislation and treaty text.

Independent completion checks

- The client identity, period and authorised scope match the actual engagement.
- Every material statement is traceable to the original record and preserves any contradiction.
- The calculations are independently reperformed and assumptions are distinguished from legal rules.
- The applicable law and source history support the conclusion for the actual period.
- A different qualified Falcon reviewer records the judgement and material limitations.
- The client authorises the intended delivery and any separate external submission is evidenced.

Sample status: not approved for client issue. No preparer, reviewer or client signature is simulated. Replace the fictional dataset and complete the real engagement review before using this document as a delivery model.

CUSTOMS AND TRADE

Customs and Trade Tax Review

PT Contoh Impor Mesin

FY2025 | Prepared for the fictional management team | 3 October 2026

Executive assessment

Resolve product classification and the customs-value bridge before approving the landed-cost model. The sample shows a 0.80 million duty sensitivity under an assumed 5% rate; the legal classification and tariff are not verified.

The fictional shipment has commercial value of IDR 1,000 million, freight of 40 million and insurance of 10 million. Management uses a declared value of 1,034 million, while the working commercial bridge totals 1,050 million. Product descriptions in the purchasing and import files are inconsistent.

Priority	Matter requiring a decision	Current evidence position
High	Product identity is inconsistent	Open for professional review
High	Value bridge contains an unexplained difference	Open for professional review
Medium	Origin preference is not evidenced	Open for professional review

This is a worked sample, not an issued client opinion. All companies, transactions, evidence records and calculations are fictional. The recommended actions demonstrate professional delivery; they do not establish a tax liability, filing eligibility, benchmark or regulatory approval.

Scope and analytical method

Purpose and intended use

The purpose is to help the fictional management team understand the evidence, the decision still required and the work needed to complete a defensible deliverable. The report is intended for internal discussion with the responsible Falcon professional. It is not a filing, an audit opinion or a guarantee of an authority outcome.

Work performed in the illustrative case

- Product classification and technical evidence
- Commercial to customs value reconciliation
- Origin and preferential treatment support
- Import tax and landed-cost controls

Trace the product to technical specifications and actual use, determine the applicable classification framework, and reconcile value components to the shipment terms and originals. Analyse origin and preference separately from shipment country. Preserve the official exchange rate and applicable rule for the actual declaration date.

Evidence population

Ref	Illustrative record	Role in the analysis
E01	Technical product and commercial file	Starting population and primary bridge
E02	Import declaration and classification record	Classification and factual support
E03	Freight insurance and shipment terms	Exception or corroboration testing
E04	Declared value and origin evidence	Decision history and completion support

The references are report-local training identifiers. They are not verified originals, app record IDs or hashes. No real client files were inspected. A live engagement must preserve the actual originals, their versions and the reviewer's assessment of each material claim. The descriptions above define the evidence that the case assumes or explicitly identifies as missing.

Coverage and limitations

Only the stated sample scope is covered. The report does not infer completeness of other entities, years, transactions or tax types. Where the record is incomplete, the analysis identifies the limitation rather than treating management's explanation as verified evidence. Any estimate remains subject to factual validation, current legal applicability and independent review.

Detailed findings and professional response

Priority is a qualitative judgement about the importance of resolving an issue before delivery. High means that the matter could change a material conclusion or prevent completion. Medium means that a control or corroboration improvement is required. These labels are not a probability of assessment or a calculated tax exposure.

Finding 1 Product identity is inconsistent

High priority. E01 describes an integrated production unit, while E02 uses a generic parts description.

Professional implication. Classification cannot be validated from abbreviated descriptions alone.

Recommended response. Obtain drawings, specifications, invoices and use descriptions and seek specialist classification review.

Finding 2 Value bridge contains an unexplained difference

High priority. E03 totals 1,050 million while E04 records 1,034 million.

Professional implication. The 16 million difference could affect import charges if it changes the legally determined value.

Recommended response. Reconcile freight, insurance, terms and any additional relevant components to originals.

Finding 3 Origin preference is not evidenced

Medium priority. The shipment file identifies the dispatch country but has no complete origin support.

Professional implication. Dispatch location does not itself establish preferential origin.

Recommended response. Review the applicable agreement and valid origin documentation before applying a preference.

Counteranalysis and judgement

An incomplete record is not proof that the taxpayer's position is wrong. Equally, an invoice, signed agreement or plausible narrative does not establish every factual or legal element. The reviewer should test alternative explanations and record what evidence would change the assessment. Preserve both supportive and adverse material so that the final conclusion remains balanced.

Financial analysis and decision alternatives

The schedule below makes the numerical reasoning reproducible. All inputs are fictional. The calculation basis states whether a value comes from the assumed record, a formula or an explicit scenario parameter. Figures should not be copied into a live return or used as a benchmark.

Measure	Illustrative result	Calculation basis
Commercial value	1,000	E01
Freight	40	E03
Insurance	10	E03
Working value bridge	1,050	1,000 plus 40 plus 10
Declared value in sample	1,034	E04
Unexplained difference	16	1,050 minus 1,034
Illustrative duty sensitivity	0.80	16 multiplied by assumed 5%

Amounts are IDR million. The 5% duty rate is a sensitivity assumption only, not the tariff for the product. The bridge does not decide customs value, classification or preferential treatment and excludes other import taxes and charges. Confirm the actual rules and declaration currency before estimating a liability or correction.

Alternatives for management discussion

Alternative	Practical rationale	Condition before adoption
Correct product documentation	Improves classification evidence	Does not itself determine the code
Reconcile declaration values	Clarifies the 16 million difference	Treatment needs customs review
Assess origin preference	Tests a potentially available route	Requires the actual agreement and originals

Management should compare the alternatives using verified facts, operational feasibility and the applicable legal analysis. A more favourable numerical scenario is not evidence that its assumptions are valid. The report therefore recommends completing the unresolved work before selecting a final tax position or an external action.

Recommendations and delivery plan

The following sequence is an illustrative internal work plan measured from engagement kick-off. It is not a statutory timetable. Any external response or filing date must be verified separately and may require faster escalation. The engagement partner remains responsible for the scope and resources agreed with the client.

Work step	Responsible role	Indicative timing	Completion evidence
Confirm scope and procedural facts	Engagement lead	Days 1 to 2	Approved scope and verified external date where relevant
Resolve finding 1	Client finance and Falcon adviser	Days 2 to 5	Original evidence and documented resolution or scope limitation
Resolve finding 2	Technical workstream lead	Days 3 to 7	Originals and approved technical treatment
Resolve finding 3	Client owner and Falcon adviser	Days 3 to 8	Reviewed action and completion evidence
Review analysis and computations	Independent Falcon partner	After evidence closure	Documented challenge and approved current version
Authorise delivery and preserve receipts	Engagement lead and client signatory	After professional approval	Final report version and any external acknowledgement

Escalation and change control

Escalate immediately if an actual external date is near, an original contradicts the working facts, the legal framework changes, or the proposed action exceeds the authorised scope. New evidence can change the recommendation. Update the affected calculations, issue analysis and report version, and obtain fresh independent review where the conclusion has changed.

Client communication

Tell the client what is established, what remains uncertain and what they must supply or decide. Explain how missing evidence limits the deliverable. Obtain approval of the final audience and language. Preserve the distinction between internal review, client delivery and authority acceptance.

Technical references and completion record

The official references below were located on 3 October 2026. They are starting points for a real technical review, not a representation that every operative article, amendment, treaty or transitional provision has been checked. No quoted legal passage or current statutory rate is relied on to decide this fictional case.

Import administration starting point

Directorate General of Customs and Excise import guidance - Service guidance does not determine the product code, valuation, origin, exchange rate or tariff for a shipment.

Open official reference

Indonesian tax administration

PMK 81 of 2024 and amendment history - The JDIH page lists amendment history including PMK 1 of 2026. Retrieve applicable originals and check all later amendments before use.

Open official reference

Required legal applicability record

For each material position, retain the original provision and exact article, authority and version, effective dates, relevant amendments and the reason it applies to the client's facts and period. Record competing interpretations and the specialist's conclusion. Official service pages and OECD guidance have different authority from domestic legislation and treaty text.

Independent completion checks

- The client identity, period and authorised scope match the actual engagement.
- Every material statement is traceable to the original record and preserves any contradiction.
- The calculations are independently reperformed and assumptions are distinguished from legal rules.
- The applicable law and source history support the conclusion for the actual period.
- A different qualified Falcon reviewer records the judgement and material limitations.
- The client authorises the intended delivery and any separate external submission is evidenced.

Sample status: not approved for client issue. No preparer, reviewer or client signature is simulated. Replace the fictional dataset and complete the real engagement review before using this document as a delivery model.

MINIMUM TAX APPLICABILITY

Global Minimum Tax Readiness

Contoh Multinational Technology Group

FY2026 readiness scenario | Prepared for the fictional management team | 3 October 2026

Executive assessment

Complete the applicability and data assessment before calculating a payable top-up tax. The simplified sample rate bridge identifies a possible modelling issue, but it omits the adjustments, exclusions and jurisdictional interactions required for a real computation.

The fictional group has consolidated revenue of EUR 900 million in the latest year, with other relevant years still being checked. For one jurisdiction, management provides income of EUR 20 million and covered taxes of EUR 2.4 million. A 15% floor is used solely as an explicit model parameter in a simplified sensitivity.

Priority	Matter requiring a decision	Current evidence position
High	Multi-year applicability is not established	Open for professional review
High	Tax classification is provisional	Open for professional review
High	Simplified output omits material mechanics	Open for professional review

This is a worked sample, not an issued client opinion. All companies, transactions, evidence records and calculations are fictional. The recommended actions demonstrate professional delivery; they do not establish a tax liability, filing eligibility, benchmark or regulatory approval.

Scope and analytical method

Purpose and intended use

The purpose is to help the fictional management team understand the evidence, the decision still required and the work needed to complete a defensible deliverable. The report is intended for internal discussion with the responsible Falcon professional. It is not a filing, an audit opinion or a guarantee of an authority outcome.

Work performed in the illustrative case

- Group perimeter and applicability
- Jurisdictional income and tax data mapping
- Adjustments exclusions and safe harbour questions
- Filing governance and system readiness

Verify the actual scope rules and revenue history, identify constituent entities and map local accounts to the applicable computation. Test covered-tax classification and timing, deferred tax and required adjustments. Assess exclusions, safe harbours and rule ordering separately before treating any model output as payable.

Evidence population

Ref	Illustrative record	Role in the analysis
E01	Consolidated revenue history and entity perimeter	Starting population and primary bridge
E02	Jurisdiction income source pack	Classification and factual support
E03	Tax and deferred tax mapping	Exception or corroboration testing
E04	Computation assumptions and exclusions log	Decision history and completion support

The references are report-local training identifiers. They are not verified originals, app record IDs or hashes. No real client files were inspected. A live engagement must preserve the actual originals, their versions and the reviewer's assessment of each material claim. The descriptions above define the evidence that the case assumes or explicitly identifies as missing.

Coverage and limitations

Only the stated sample scope is covered. The report does not infer completeness of other entities, years, transactions or tax types. Where the record is incomplete, the analysis identifies the limitation rather than treating management's explanation as verified evidence. Any estimate remains subject to factual validation, current legal applicability and independent review.

Detailed findings and professional response

Priority is a qualitative judgement about the importance of resolving an issue before delivery. High means that the matter could change a material conclusion or prevent completion. Medium means that a control or corroboration improvement is required. These labels are not a probability of assessment or a calculated tax exposure.

Finding 1 Multi-year applicability is not established

High priority. E01 supplies only one revenue year and an incomplete entity perimeter.

Professional implication. The latest consolidated figure alone is not a complete applicability assessment.

Recommended response. Collect the required history and entity facts and document the current domestic framework.

Finding 2 Tax classification is provisional

High priority. E03 groups taxes without a verified covered-tax mapping.

Professional implication. A book-tax ratio may not equal the effective rate under the applicable rules.

Recommended response. Reconcile tax components, timing and adjustments in a controlled data dictionary.

Finding 3 Simplified output omits material mechanics

High priority. E04 excludes substance-based calculations, safe harbours and interactions with other jurisdictional rules.

Professional implication. The simple difference cannot be described as a legal top-up liability.

Recommended response. Complete the technical computation and obtain specialist review of each applicable mechanism.

Counteranalysis and judgement

An incomplete record is not proof that the taxpayer's position is wrong. Equally, an invoice, signed agreement or plausible narrative does not establish every factual or legal element. The reviewer should test alternative explanations and record what evidence would change the assessment. Preserve both supportive and adverse material so that the final conclusion remains balanced.

Financial analysis and decision alternatives

The schedule below makes the numerical reasoning reproducible. All inputs are fictional. The calculation basis states whether a value comes from the assumed record, a formula or an explicit scenario parameter. Figures should not be copied into a live return or used as a benchmark.

Measure	Illustrative result	Calculation basis
Jurisdiction income assumption EUR million	20.00	E02
Covered tax assumption EUR million	2.40	E03
Simple effective rate	12.00%	2.40 divided by 20.00
Model floor parameter	15.00%	Explicit simplified assumption
Simple rate difference	3.00 percentage points	15.00% minus 12.00%
Pre-adjustment sensitivity EUR million	0.60	20.00 multiplied by 3.00%

This table uses EUR million, not IDR. The 0.60 million result is a deliberately simplified sensitivity before exclusions, safe harbours, allocation, qualified domestic tax interaction and other adjustments. It is not tax payable. The identified Indonesian reference is PMK 136 of 2024; the actual period, amendments and international guidance must be verified for a real engagement.

Alternatives for management discussion

Alternative	Practical rationale	Condition before adoption
Perform applicability review first	Avoids unnecessary full computation	Requires complete group facts
Build a controlled data model	Improves repeatability and review	Needs technical mapping and source lineage
Run jurisdictional computation	Tests actual exposure	Requires specialist interpretation and qualification

Management should compare the alternatives using verified facts, operational feasibility and the applicable legal analysis. A more favourable numerical scenario is not evidence that its assumptions are valid. The report therefore recommends completing the unresolved work before selecting a final tax position or an external action.

Recommendations and delivery plan

The following sequence is an illustrative internal work plan measured from engagement kick-off. It is not a statutory timetable. Any external response or filing date must be verified separately and may require faster escalation. The engagement partner remains responsible for the scope and resources agreed with the client.

Work step	Responsible role	Indicative timing	Completion evidence
Confirm scope and procedural facts	Engagement lead	Days 1 to 2	Approved scope and verified external date where relevant
Resolve finding 1	Client finance and Falcon adviser	Days 2 to 5	Original evidence and documented resolution or scope limitation
Resolve finding 2	Technical workstream lead	Days 3 to 7	Originals and approved technical treatment
Resolve finding 3	Client owner and Falcon adviser	Days 3 to 8	Reviewed action and completion evidence
Review analysis and computations	Independent Falcon partner	After evidence closure	Documented challenge and approved current version
Authorise delivery and preserve receipts	Engagement lead and client signatory	After professional approval	Final report version and any external acknowledgement

Escalation and change control

Escalate immediately if an actual external date is near, an original contradicts the working facts, the legal framework changes, or the proposed action exceeds the authorised scope. New evidence can change the recommendation. Update the affected calculations, issue analysis and report version, and obtain fresh independent review where the conclusion has changed.

Client communication

Tell the client what is established, what remains uncertain and what they must supply or decide. Explain how missing evidence limits the deliverable. Obtain approval of the final audience and language. Preserve the distinction between internal review, client delivery and authority acceptance.

Technical references and completion record

The official references below were located on 3 October 2026. They are starting points for a real technical review, not a representation that every operative article, amendment, treaty or transitional provision has been checked. No quoted legal passage or current statutory rate is relied on to decide this fictional case.

Indonesian global minimum tax framework

PMK 136 of 2024 - Review current applicability, computation, transition, later changes and relevant international guidance for the actual period.

Open official reference

Indonesian tax administration

PMK 81 of 2024 and amendment history - The JDIH page lists amendment history including PMK 1 of 2026. Retrieve applicable originals and check all later amendments before use.

Open official reference

Required legal applicability record

For each material position, retain the original provision and exact article, authority and version, effective dates, relevant amendments and the reason it applies to the client's facts and period. Record competing interpretations and the specialist's conclusion. Official service pages and OECD guidance have different authority from domestic legislation and treaty text.

Independent completion checks

- The client identity, period and authorised scope match the actual engagement.
- Every material statement is traceable to the original record and preserves any contradiction.
- The calculations are independently reperformed and assumptions are distinguished from legal rules.
- The applicable law and source history support the conclusion for the actual period.
- A different qualified Falcon reviewer records the judgement and material limitations.
- The client authorises the intended delivery and any separate external submission is evidenced.

Sample status: not approved for client issue. No preparer, reviewer or client signature is simulated. Replace the fictional dataset and complete the real engagement review before using this document as a delivery model.

CASH FLOW PLANNING

Tax Cash Flow Planning Report

PT Contoh Usaha Bertumbuh

Four forecast quarters | Prepared for the fictional management team | 3 October 2026

Executive assessment

Keep uncertain refunds outside the committed liquidity case. The sample base forecast closes with 700 million; a 1,500 million payment acceleration creates an 800 million funding gap unless a separately verified receipt or funding arrangement occurs.

The fictional treasury plan starts with IDR 5,000 million. Four quarters have operating cash flows of 2,000, 2,500, 3,000 and 3,500 million, tax cash outflows of 1,800, 2,000, 2,200 and 2,300 million, and capital expenditure of 1,000, 1,500, 2,000 and 2,500 million. A possible 2,000 million refund is not approved.

Priority	Matter requiring a decision	Current evidence position
High	Refund is not a committed inflow	Open for professional review
Medium	Tax acceleration creates a tighter cushion	Open for professional review
Medium	Forecast updates lack a reconciliation owner	Open for professional review

This is a worked sample, not an issued client opinion. All companies, transactions, evidence records and calculations are fictional. The recommended actions demonstrate professional delivery; they do not establish a tax liability, filing eligibility, benchmark or regulatory approval.

Scope and analytical method

Purpose and intended use

The purpose is to help the fictional management team understand the evidence, the decision still required and the work needed to complete a defensible deliverable. The report is intended for internal discussion with the responsible Falcon professional. It is not a filing, an audit opinion or a guarantee of an authority outcome.

Work performed in the illustrative case

- Tax payment and refund forecast
- Working capital and capital expenditure interfaces
- Base and stress liquidity scenarios
- Forecast ownership and monitoring

Reconcile opening cash to bank and treasury records, map tax cash flows to verified obligations and payment plans, and separate accrued tax from cash timing. Model uncertain recoveries as conditional scenarios. Reconcile stress assumptions to specific payment events rather than shifting dates to create a preferred liquidity result.

Evidence population

Ref	Illustrative record	Role in the analysis
E01	Opening cash and operating forecast	Starting population and primary bridge
E02	Tax payment and obligation schedule	Classification and factual support
E03	Refund status record	Exception or corroboration testing
E04	Capital expenditure and variance governance	Decision history and completion support

The references are report-local training identifiers. They are not verified originals, app record IDs or hashes. No real client files were inspected. A live engagement must preserve the actual originals, their versions and the reviewer's assessment of each material claim. The descriptions above define the evidence that the case assumes or explicitly identifies as missing.

Coverage and limitations

Only the stated sample scope is covered. The report does not infer completeness of other entities, years, transactions or tax types. Where the record is incomplete, the analysis identifies the limitation rather than treating management's explanation as verified evidence. Any estimate remains subject to factual validation, current legal applicability and independent review.

Detailed findings and professional response

Priority is a qualitative judgement about the importance of resolving an issue before delivery. High means that the matter could change a material conclusion or prevent completion. Medium means that a control or corroboration improvement is required. These labels are not a probability of assessment or a calculated tax exposure.

Finding 1 Refund is not a committed inflow

High priority. E03 describes an anticipated 2,000 million receipt without verified entitlement or processing status.

Professional implication. Including it in base liquidity could conceal a funding requirement.

Recommended response. Exclude it from the committed case and monitor it separately with evidence of status.

Finding 2 Tax acceleration creates a tighter cushion

Medium priority. E02 identifies a possible additional 1,500 million near-term payment.

Professional implication. The sample closing balance falls materially even though the operating plan is unchanged.

Recommended response. Review payment facts and arrange a funding contingency consistent with verified obligations.

Finding 3 Forecast updates lack a reconciliation owner

Medium priority. E04 does not assign responsibility for comparing actual tax payments with forecast events.

Professional implication. Timing errors may persist and weaken treasury decisions.

Recommended response. Set a monthly variance review with finance and the tax owner, preserving event-level explanations.

Counteranalysis and judgement

An incomplete record is not proof that the taxpayer's position is wrong. Equally, an invoice, signed agreement or plausible narrative does not establish every factual or legal element. The reviewer should test alternative explanations and record what evidence would change the assessment. Preserve both supportive and adverse material so that the final conclusion remains balanced.

Financial analysis and decision alternatives

The schedule below makes the numerical reasoning reproducible. All inputs are fictional. The calculation basis states whether a value comes from the assumed record, a formula or an explicit scenario parameter. Figures should not be copied into a live return or used as a benchmark.

Measure	Illustrative result	Calculation basis
Opening cash	5,000	E01
Total operating cash inflows	11,000	2,000 plus 2,500 plus 3,000 plus 3,500
Total tax cash outflows	8,300	1,800 plus 2,000 plus 2,200 plus 2,300
Total capital expenditure	7,000	1,000 plus 1,500 plus 2,000 plus 2,500
Base closing cash	700	5,000 plus 11,000 minus 8,300 minus 7,000
Closing cash with accelerated payment	-800	700 minus 1,500
Conditional refund scenario closing cash	1,200	-800 plus 2,000

Amounts are IDR million. The detailed arithmetic produces 700 million in the base case and negative 800 million under the payment stress. A conditional refund raises the stressed balance to 1,200 million but remains outside committed liquidity. Quarter-end base cash is 4,200, 3,200, 2,000 and 700 million. Negative cash represents a funding gap, not permission to defer an obligation.

Alternatives for management discussion

Alternative	Practical rationale	Condition before adoption
Maintain a no-refund base case	Shows committed funding needs	Does not forecast a denied refund
Arrange a funding contingency	Addresses the stressed gap	Terms and authority require treasury approval
Monitor tax events monthly	Improves forecast accuracy	Needs actual payment and receipt evidence

Management should compare the alternatives using verified facts, operational feasibility and the applicable legal analysis. A more favourable numerical scenario is not evidence that its assumptions are valid. The report therefore recommends completing the unresolved work before selecting a final tax position or an external action.

Recommendations and delivery plan

The following sequence is an illustrative internal work plan measured from engagement kick-off. It is not a statutory timetable. Any external response or filing date must be verified separately and may require faster escalation. The engagement partner remains responsible for the scope and resources agreed with the client.

Work step	Responsible role	Indicative timing	Completion evidence
Confirm scope and procedural facts	Engagement lead	Days 1 to 2	Approved scope and verified external date where relevant
Resolve finding 1	Client finance and Falcon adviser	Days 2 to 5	Original evidence and documented resolution or scope limitation
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Resolve finding 3	Client owner and Falcon adviser	Days 3 to 8	Reviewed action and completion evidence
Review analysis and computations	Independent Falcon partner	After evidence closure	Documented challenge and approved current version
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Escalation and change control

Escalate immediately if an actual external date is near, an original contradicts the working facts, the legal framework changes, or the proposed action exceeds the authorised scope. New evidence can change the recommendation. Update the affected calculations, issue analysis and report version, and obtain fresh independent review where the conclusion has changed.

Client communication

Tell the client what is established, what remains uncertain and what they must supply or decide. Explain how missing evidence limits the deliverable. Obtain approval of the final audience and language. Preserve the distinction between internal review, client delivery and authority acceptance.

Technical references and completion record

The official references below were located on 3 October 2026. They are starting points for a real technical review, not a representation that every operative article, amendment, treaty or transitional provision has been checked. No quoted legal passage or current statutory rate is relied on to decide this fictional case.

Indonesian tax administration

PMK 81 of 2024 and amendment history - The JDIH page lists amendment history including PMK 1 of 2026. Retrieve applicable originals and check all later amendments before use.

Open official reference

Required legal applicability record

For each material position, retain the original provision and exact article, authority and version, effective dates, relevant amendments and the reason it applies to the client's facts and period. Record competing interpretations and the specialist's conclusion. Official service pages and OECD guidance have different authority from domestic legislation and treaty text.

Independent completion checks

- The client identity, period and authorised scope match the actual engagement.
- Every material statement is traceable to the original record and preserves any contradiction.
- The calculations are independently reperformed and assumptions are distinguished from legal rules.
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- A different qualified Falcon reviewer records the judgement and material limitations.
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TAX TECHNOLOGY

Tax Technology and Controls Roadmap

PT Contoh Digital Operasi

Current state and 90-day pilot | Prepared for the fictional management team | 3 October 2026

Executive assessment

Pilot controlled reconciliations and evidence capture before automating tax decisions. The sample productivity estimate is attractive, but it assumes successful adoption and excludes integration and quality failures.

The fictional team spends 120 hours per month on reconciliations and evidence collation. A proposed workflow could reduce that effort by 50 hours. The assumed internal cost is IDR 0.30 million per hour; recurring software and oversight cost is 4 million monthly, with 90 million of initial implementation cost.

Priority	Matter requiring a decision	Current evidence position
High	Data identity is inconsistent	Open for professional review
High	Access and approval need separation	Open for professional review
Medium	Savings and AI quality are unproven	Open for professional review

This is a worked sample, not an issued client opinion. All companies, transactions, evidence records and calculations are fictional. The recommended actions demonstrate professional delivery; they do not establish a tax liability, filing eligibility, benchmark or regulatory approval.

Scope and analytical method

Purpose and intended use

The purpose is to help the fictional management team understand the evidence, the decision still required and the work needed to complete a defensible deliverable. The report is intended for internal discussion with the responsible Falcon professional. It is not a filing, an audit opinion or a guarantee of an authority outcome.

Work performed in the illustrative case

- Data sources and process mapping
- Tax data model and reconciliation rules
- Access audit and exception controls
- Automation and responsible AI governance

Map data lineage from originals to reports, define validation rules and ownership, and distinguish deterministic checks from judgement. Pilot on a bounded workstream with controlled access and a retained manual path. Require professional review of tax interpretation and a measured evaluation before enabling any AI route for the intended work type.

Evidence population

Ref	Illustrative record	Role in the analysis
E01	Data source and identifier map	Starting population and primary bridge
E02	Access and approval matrix	Classification and factual support
E03	Time study and implementation cost model	Exception or corroboration testing
E04	Pilot quality and AI evaluation register	Decision history and completion support

The references are report-local training identifiers. They are not verified originals, app record IDs or hashes. No real client files were inspected. A live engagement must preserve the actual originals, their versions and the reviewer's assessment of each material claim. The descriptions above define the evidence that the case assumes or explicitly identifies as missing.

Coverage and limitations

Only the stated sample scope is covered. The report does not infer completeness of other entities, years, transactions or tax types. Where the record is incomplete, the analysis identifies the limitation rather than treating management's explanation as verified evidence. Any estimate remains subject to factual validation, current legal applicability and independent review.

Detailed findings and professional response

Priority is a qualitative judgement about the importance of resolving an issue before delivery. High means that the matter could change a material conclusion or prevent completion. Medium means that a control or corroboration improvement is required. These labels are not a probability of assessment or a calculated tax exposure.

Finding 1 Data identity is inconsistent

High priority. E01 uses different invoice identifiers in the ledger and evidence register.

Professional implication. Automation can create false matches or duplicate transactions without a controlled key.

Recommended response. Define canonical identifiers and preserve original references with exception handling.

Finding 2 Access and approval need separation

High priority. E02 allows the same role to change rules, prepare results and approve delivery.

Professional implication. An efficient process can still be unreliable if independent review is bypassed.

Recommended response. Separate configuration, preparation and approval permissions, with an audit trail.

Finding 3 Savings and AI quality are unproven

Medium priority. E03 records a forecast saving rather than a measured pilot. E04 contains no model evaluation results.

Professional implication. Neither the productivity case nor the accuracy claim is established.

Recommended response. Measure review effort and errors in a pilot. Keep model selection, qualification and spending limits under configured owner control.

Counteranalysis and judgement

An incomplete record is not proof that the taxpayer's position is wrong. Equally, an invoice, signed agreement or plausible narrative does not establish every factual or legal element. The reviewer should test alternative explanations and record what evidence would change the assessment. Preserve both supportive and adverse material so that the final conclusion remains balanced.

Financial analysis and decision alternatives

The schedule below makes the numerical reasoning reproducible. All inputs are fictional. The calculation basis states whether a value comes from the assumed record, a formula or an explicit scenario parameter. Figures should not be copied into a live return or used as a benchmark.

Measure	Illustrative result	Calculation basis
Monthly effort reduction hours	50	120 minus assumed 70
Monthly gross time value	15.00	50 multiplied by assumed 0.30
Monthly recurring cost	4.00	E03
Monthly net benefit	11.00	15.00 minus 4.00
Initial implementation cost	90.00	E03
Simple payback months	8.18	90.00 divided by 11.00

Currency values are IDR million; hours and months are labelled separately. Payback is an undiscounted scenario, not a guaranteed saving or staffing reduction. The model excludes adoption delay, integration, exception handling and overruns. Recalculate using measured pilot results and include the cost of independent review, API usage and retained manual controls.

Alternatives for management discussion

Alternative	Practical rationale	Condition before adoption
Controlled reconciliation pilot	Tests value on a bounded process	Requires agreed measures and stop conditions
Evidence and approval integration	Improves lineage and review	Needs access and change controls
Qualified AI assistance	Can support approved tasks	Needs actual evaluation and spending oversight

Management should compare the alternatives using verified facts, operational feasibility and the applicable legal analysis. A more favourable numerical scenario is not evidence that its assumptions are valid. The report therefore recommends completing the unresolved work before selecting a final tax position or an external action.

Recommendations and delivery plan

The following sequence is an illustrative internal work plan measured from engagement kick-off. It is not a statutory timetable. Any external response or filing date must be verified separately and may require faster escalation. The engagement partner remains responsible for the scope and resources agreed with the client.

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Escalation and change control

Escalate immediately if an actual external date is near, an original contradicts the working facts, the legal framework changes, or the proposed action exceeds the authorised scope. New evidence can change the recommendation. Update the affected calculations, issue analysis and report version, and obtain fresh independent review where the conclusion has changed.

Client communication

Tell the client what is established, what remains uncertain and what they must supply or decide. Explain how missing evidence limits the deliverable. Obtain approval of the final audience and language. Preserve the distinction between internal review, client delivery and authority acceptance.

Technical references and completion record

The official references below were located on 3 October 2026. They are starting points for a real technical review, not a representation that every operative article, amendment, treaty or transitional provision has been checked. No quoted legal passage or current statutory rate is relied on to decide this fictional case.

Indonesian tax administration

PMK 81 of 2024 and amendment history - The JDIH page lists amendment history including PMK 1 of 2026. Retrieve applicable originals and check all later amendments before use.

Open official reference

Indonesian related party transactions

PMK 172 of 2023 - Review the applicable articles, period, documentation, MAP and APA provisions and any subsequent changes.

Open official reference

Required legal applicability record

For each material position, retain the original provision and exact article, authority and version, effective dates, relevant amendments and the reason it applies to the client's facts and period. Record competing interpretations and the specialist's conclusion. Official service pages and OECD guidance have different authority from domestic legislation and treaty text.

Independent completion checks

- The client identity, period and authorised scope match the actual engagement.
- Every material statement is traceable to the original record and preserves any contradiction.
- The calculations are independently reperformed and assumptions are distinguished from legal rules.
- The applicable law and source history support the conclusion for the actual period.
- A different qualified Falcon reviewer records the judgement and material limitations.
- The client authorises the intended delivery and any separate external submission is evidenced.

Sample status: not approved for client issue. No preparer, reviewer or client signature is simulated. Replace the fictional dataset and complete the real engagement review before using this document as a delivery model.

CORPORATE INCOME TAX COMPLIANCE

Annual Corporate Income Tax Review

PT Contoh Produksi Nasional

FY2025 | Prepared for the fictional management team | 3 October 2026

Executive assessment

Resolve the fiscal adjustments and credit evidence before approving the annual computation. The sample produces a provisional taxable-base scenario of 11,500 million; the assumed 20% model rate is illustrative and is not the prescribed rate for the client.

The fictional company reports profit before tax of IDR 10,000 million. Management proposes positive fiscal adjustments of 2,000 million, negative adjustments of 500 million and credits of 1,700 million. No carried-forward loss is assumed. The pack contains depreciation differences, service costs and selected withholding certificates.

Priority	Matter requiring a decision	Current evidence position
High	Adjustment schedule lacks legal mapping	Open for professional review
Medium	Depreciation differences need asset detail	Open for professional review
High	Credits remain provisional	Open for professional review

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Scope and analytical method

Purpose and intended use

The purpose is to help the fictional management team understand the evidence, the decision still required and the work needed to complete a defensible deliverable. The report is intended for internal discussion with the responsible Falcon professional. It is not a filing, an audit opinion or a guarantee of an authority outcome.

Work performed in the illustrative case

- Accounting to fiscal profit reconciliation
- Income expense and depreciation classification
- Credits and prior payment reconciliation
- Annual return review and evidence package

Tie the starting profit to approved accounts, test each fiscal adjustment against its original and applicable rule, and reconcile losses and credits by period. Distinguish permanent and timing differences and preserve their reversal logic. Reperform the calculation only after determining actual taxpayer status and applicable rates or facilities.

Evidence population

Ref	Illustrative record	Role in the analysis
E01	Approved accounts and profit bridge	Starting population and primary bridge
E02	Fiscal adjustment workpapers	Classification and factual support
E03	Asset and depreciation register	Exception or corroboration testing
E04	Credit certificates and payment references	Decision history and completion support

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Coverage and limitations

Only the stated sample scope is covered. The report does not infer completeness of other entities, years, transactions or tax types. Where the record is incomplete, the analysis identifies the limitation rather than treating management's explanation as verified evidence. Any estimate remains subject to factual validation, current legal applicability and independent review.

Detailed findings and professional response

Priority is a qualitative judgement about the importance of resolving an issue before delivery. High means that the matter could change a material conclusion or prevent completion. Medium means that a control or corroboration improvement is required. These labels are not a probability of assessment or a calculated tax exposure.

Finding 1 Adjustment schedule lacks legal mapping

High priority. E02 lists 2,000 million of add-backs without an issue-by-issue source and applicability record.

Professional implication. A numeric schedule alone cannot validate the fiscal treatment.

Recommended response. Prepare a line-level accounting and legal bridge with independent review of material positions.

Finding 2 Depreciation differences need asset detail

Medium priority. E03 summarises a 500 million negative adjustment without the complete asset and timing register.

Professional implication. A current reduction could be inconsistent with previous and future periods.

Recommended response. Reconcile cost, classification, commencement and prior treatment for the relevant assets.

Finding 3 Credits remain provisional

High priority. E04 records 1,700 million without complete original certificate and payment matching.

Professional implication. The residual payment scenario depends directly on the validity and period of those credits.

Recommended response. Verify original certificates and payment references and resolve duplicates or wrong-period entries.

Counteranalysis and judgement

An incomplete record is not proof that the taxpayer's position is wrong. Equally, an invoice, signed agreement or plausible narrative does not establish every factual or legal element. The reviewer should test alternative explanations and record what evidence would change the assessment. Preserve both supportive and adverse material so that the final conclusion remains balanced.

Financial analysis and decision alternatives

The schedule below makes the numerical reasoning reproducible. All inputs are fictional. The calculation basis states whether a value comes from the assumed record, a formula or an explicit scenario parameter. Figures should not be copied into a live return or used as a benchmark.

Measure	Illustrative result	Calculation basis
Accounting profit before tax	10,000	E01
Positive fiscal adjustments	2,000	E02
Negative fiscal adjustments	500	E03
Provisional taxable-base scenario	11,500	10,000 plus 2,000 minus 500
Tax at assumed model rate 20%	2,300	11,500 multiplied by 20%
Provisional credits	1,700	E04
Residual model payment	600	2,300 minus 1,700

Amounts are IDR million. The 20% parameter is deliberately labelled as a modelling assumption and must be replaced by the verified applicable treatment. A one percentage point rate change alters the gross model tax by 115 million. The 600 million residual is not a filing amount; adjustments, losses, facilities, credits and actual rules remain subject to professional review.

Alternatives for management discussion

Alternative	Practical rationale	Condition before adoption
Complete the fiscal bridge	Supports a reproducible computation	Each adjustment needs verified treatment
Verify credits independently	Tests the payment offset	Requires authentic originals and period matching
Approve the annual package	Creates a controlled deliverable	External submission and receipt are separate

Management should compare the alternatives using verified facts, operational feasibility and the applicable legal analysis. A more favourable numerical scenario is not evidence that its assumptions are valid. The report therefore recommends completing the unresolved work before selecting a final tax position or an external action.

Recommendations and delivery plan

The following sequence is an illustrative internal work plan measured from engagement kick-off. It is not a statutory timetable. Any external response or filing date must be verified separately and may require faster escalation. The engagement partner remains responsible for the scope and resources agreed with the client.

Work step	Responsible role	Indicative timing	Completion evidence
Confirm scope and procedural facts	Engagement lead	Days 1 to 2	Approved scope and verified external date where relevant
Resolve finding 1	Client finance and Falcon adviser	Days 2 to 5	Original evidence and documented resolution or scope limitation
Resolve finding 2	Technical workstream lead	Days 3 to 7	Originals and approved technical treatment
Resolve finding 3	Client owner and Falcon adviser	Days 3 to 8	Reviewed action and completion evidence
Review analysis and computations	Independent Falcon partner	After evidence closure	Documented challenge and approved current version
Authorise delivery and preserve receipts	Engagement lead and client signatory	After professional approval	Final report version and any external acknowledgement

Escalation and change control

Escalate immediately if an actual external date is near, an original contradicts the working facts, the legal framework changes, or the proposed action exceeds the authorised scope. New evidence can change the recommendation. Update the affected calculations, issue analysis and report version, and obtain fresh independent review where the conclusion has changed.

Client communication

Tell the client what is established, what remains uncertain and what they must supply or decide. Explain how missing evidence limits the deliverable. Obtain approval of the final audience and language. Preserve the distinction between internal review, client delivery and authority acceptance.

Technical references and completion record

The official references below were located on 3 October 2026. They are starting points for a real technical review, not a representation that every operative article, amendment, treaty or transitional provision has been checked. No quoted legal passage or current statutory rate is relied on to decide this fictional case.

Indonesian tax administration

PMK 81 of 2024 and amendment history - The JDIH page lists amendment history including PMK 1 of 2026. Retrieve applicable originals and check all later amendments before use.

Open official reference

Indonesian related party transactions

PMK 172 of 2023 - Review the applicable articles, period, documentation, MAP and APA provisions and any subsequent changes.

Open official reference

Required legal applicability record

For each material position, retain the original provision and exact article, authority and version, effective dates, relevant amendments and the reason it applies to the client's facts and period. Record competing interpretations and the specialist's conclusion. Official service pages and OECD guidance have different authority from domestic legislation and treaty text.

Independent completion checks

- The client identity, period and authorised scope match the actual engagement.
- Every material statement is traceable to the original record and preserves any contradiction.
- The calculations are independently reperformed and assumptions are distinguished from legal rules.
- The applicable law and source history support the conclusion for the actual period.
- A different qualified Falcon reviewer records the judgement and material limitations.
- The client authorises the intended delivery and any separate external submission is evidenced.

Sample status: not approved for client issue. No preparer, reviewer or client signature is simulated. Replace the fictional dataset and complete the real engagement review before using this document as a delivery model.

WITHHOLDING TAX COMPLIANCE

Withholding Tax Reconciliation Report

PT Contoh Jasa Terpadu

September 2026 | Prepared for the fictional management team | 3 October 2026

Executive assessment

Reconcile the payment population and certificate register before approving withholding. The sample illustrates a 5 million difference under an assumed 2% model rate, but transaction classification and actual applicable treatment have not been verified.

The fictional accounts payable register contains IDR 5,000 million of selected service payments. The working withholding register includes 4,750 million and 95 million of withholding. The missing 250 million includes reimbursed costs and an unclassified supplier payment. Overseas transactions are excluded from this sample population.

Priority	Matter requiring a decision	Current evidence position
High	The withholding population is incomplete	Open for professional review
Medium	Reimbursement classification needs evidence	Open for professional review
High	Certificate and payment proof are not complete	Open for professional review

This is a worked sample, not an issued client opinion. All companies, transactions, evidence records and calculations are fictional. The recommended actions demonstrate professional delivery; they do not establish a tax liability, filing eligibility, benchmark or regulatory approval.

Scope and analytical method

Purpose and intended use

The purpose is to help the fictional management team understand the evidence, the decision still required and the work needed to complete a defensible deliverable. The report is intended for internal discussion with the responsible Falcon professional. It is not a filing, an audit opinion or a guarantee of an authority outcome.

Work performed in the illustrative case

- Accounts payable and payment population
- Supplier and transaction classification
- Certificates return and payment matching
- Exception remediation and recurring controls

Build the complete payment population and map each item to the supplier, contract, service and payment timing. Determine the actual withholding treatment from current rules and facts rather than an account label. Match computed withholding to certificates, returns and payment references, with separate analysis for different regimes or cross-border payments.

Evidence population

Ref	Illustrative record	Role in the analysis
E01	Accounts payable and payment ledger	Starting population and primary bridge
E02	Withholding calculation register	Classification and factual support
E03	Supplier contracts and reimbursement evidence	Exception or corroboration testing
E04	Certificates return and payment pack	Decision history and completion support

The references are report-local training identifiers. They are not verified originals, app record IDs or hashes. No real client files were inspected. A live engagement must preserve the actual originals, their versions and the reviewer's assessment of each material claim. The descriptions above define the evidence that the case assumes or explicitly identifies as missing.

Coverage and limitations

Only the stated sample scope is covered. The report does not infer completeness of other entities, years, transactions or tax types. Where the record is incomplete, the analysis identifies the limitation rather than treating management's explanation as verified evidence. Any estimate remains subject to factual validation, current legal applicability and independent review.

Detailed findings and professional response

Priority is a qualitative judgement about the importance of resolving an issue before delivery. High means that the matter could change a material conclusion or prevent completion. Medium means that a control or corroboration improvement is required. These labels are not a probability of assessment or a calculated tax exposure.

Finding 1 The withholding population is incomplete

High priority. E01 exceeds E02 by 250 million. The excluded entries have not been reviewed by transaction.

Professional implication. The register may omit relevant payments or intentionally exclude items with a valid basis.

Recommended response. Reconcile the complete population and preserve the reason for each inclusion or exclusion.

Finding 2 Reimbursement classification needs evidence

Medium priority. E03 uses the reimbursement label without complete contracts or third-party invoice support.

Professional implication. A description in accounts payable is insufficient to decide tax treatment.

Recommended response. Review the underlying arrangement, payment flow and actual applicable provisions.

Finding 3 Certificate and payment proof are not complete

High priority. E04 does not match all recorded withholding to issued certificates and payment references.

Professional implication. A calculated amount does not prove that withholding was documented, reported and paid correctly.

Recommended response. Complete the certificate-return-payment bridge and retain authorised external receipts.

Counteranalysis and judgement

An incomplete record is not proof that the taxpayer's position is wrong. Equally, an invoice, signed agreement or plausible narrative does not establish every factual or legal element. The reviewer should test alternative explanations and record what evidence would change the assessment. Preserve both supportive and adverse material so that the final conclusion remains balanced.

Financial analysis and decision alternatives

The schedule below makes the numerical reasoning reproducible. All inputs are fictional. The calculation basis states whether a value comes from the assumed record, a formula or an explicit scenario parameter. Figures should not be copied into a live return or used as a benchmark.

Measure	Illustrative result	Calculation basis
Selected payment population	5,000	E01
Working register population	4,750	E02
Population difference	250	5,000 minus 4,750
Recorded model withholding	95	4,750 multiplied by assumed 2%
Full-population model withholding	100	5,000 multiplied by assumed 2%
Illustrative model difference	5	100 minus 95

Amounts are IDR million. The 2% parameter is an explicit scenario assumption, not a rate assigned to these transactions. Applying one rate to the full population is only a sensitivity. Actual withholding depends on classification, recipient facts, timing and applicable law. No penalty or correction entitlement is estimated.

Alternatives for management discussion

Alternative	Practical rationale	Condition before adoption
Complete transaction mapping	Identifies supported treatment	Requires supplier and contract facts
Correct validated exceptions	Aligns the working register	Any external correction needs authorised review
Strengthen recurring matching	Reduces missing certificates	Requires owner and independent completion checks

Management should compare the alternatives using verified facts, operational feasibility and the applicable legal analysis. A more favourable numerical scenario is not evidence that its assumptions are valid. The report therefore recommends completing the unresolved work before selecting a final tax position or an external action.

Recommendations and delivery plan

The following sequence is an illustrative internal work plan measured from engagement kick-off. It is not a statutory timetable. Any external response or filing date must be verified separately and may require faster escalation. The engagement partner remains responsible for the scope and resources agreed with the client.

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- The calculations are independently reperformed and assumptions are distinguished from legal rules.
- The applicable law and source history support the conclusion for the actual period.
- A different qualified Falcon reviewer records the judgement and material limitations.
- The client authorises the intended delivery and any separate external submission is evidenced.

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