



The Administration of Tax Treaty Benefits in Indonesia

Minister of Finance Regulation No. 112 of 2025

30 July 2026



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Part 01

An Evolving Framework

A History of Regulation

01

The Implementation of
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DG Regulation No. 25 of
2018 & DG Reg. No. 28 of
2018

02

Mandates from
Art 50 para (2) Government Reg. No. 55
of 2022 on Income Tax Adjustment &
Presidential Reg. No. 77 of 2019 (jo. PR
No. 63 of 2024) on MLI

03

The Current The Implementation of
Treaty Benefits
Minister of Finance Reg. No. 112 of
2025



BUILDING A GROWTH-FRIENDLY TAX ENVIRONMENT



Part 02

Administrative Procedure

Administrative Procedure

01

CERTIFY

The non-resident completes Form DGT, certified by the CA of the treaty partner or a certificate of residence. The form covers a period of up to twelve months.

02

VERIFY

The withholding agent verifies the form, submits it through the Taxpayer Portal, and receives an e-receipt, which it then be provided to the non-resident.

03

RELY

The e-receipt establishes entitlement for each subsequent payment within the covered period. Each subsequent withholding agent verifies before applying the treaty rate.



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DGT Form: Taxpayer's Statement



Tax Subject

Not a Domestic Tax Subject



Resident

Resident of the DTA Partner



No Treaty Abuse

Is a Beneficial Ownership; has economic substance; legal and economic alignment; adequate management, assets, employee; has active business; No main objective obtaining tax benefits



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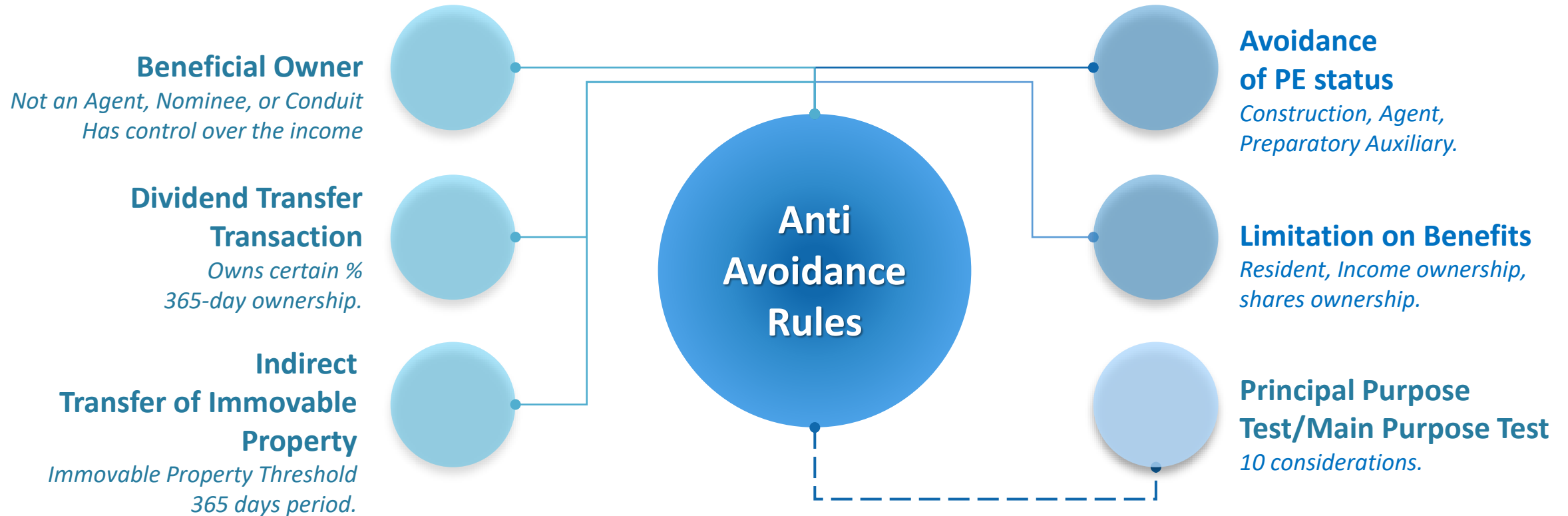


Part 03

Anti Avoidance Rules



Rules Based on DTA and MLI



In Any Avoidance Case, DGT determines the tax owed in accordance with the Income Tax



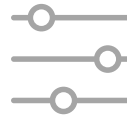
Part 04

Observations for Consideration

Observations for Consideration



Continuous alignment to best practices and global standards



Streamlining the procedure upon the certainty for taxpayers



Anti avoidance measures that reflects matching responses to evolving risks on tax treaties



BUILDING A GROWTH-FRIENDLY TAX ENVIRONMENT



THANK YOU