

ABSTRACT

This study aims to examine the effect of Thin Capitalization and Transfer Pricing on tax aggressiveness, as well as to analyze the role of Environmental, Social, and Governance (ESG) disclosure in moderating these relationships. The phenomenon of tax aggressiveness through Base Erosion and Profit Shifting (BEPS) schemes serves as the background for this research, where Thin Capitalization and Transfer Pricing practices are often associated with efforts to minimize tax burdens, thereby impacting state revenue. This study employs a quantitative approach using secondary data obtained from annual reports and Bloomberg ESG Database of manufacturing companies listed on the Indonesia Stock Exchange (IDX) for the 2020–2023 period. Sampling was conducted using the purposive sampling method, resulting in total research observations analyzed using Regression Analysis and Moderated Regression Analysis (MRA) with SPSS software. Tax aggressiveness in this study is proxied using the Effective Tax Rate (ETR). The results indicate that Thin Capitalization and Transfer Pricing have a negative and significant effect on ETR, implying that an increase in these practices actually reduces the level of corporate tax aggressiveness. These findings align with Signaling Theory, where companies tend to comply with tax regulations to maintain reputation and legitimacy. However, this study found that ESG disclosure does not moderate the effect of either Thin Capitalization or Transfer Pricing on tax aggressiveness. This suggests that ESG disclosure operates separately from corporate strategic tax decisions and has not yet functioned effectively as a control mechanism over tax management practices.

Keywords: *Tax Aggressiveness, Thin Capitalization, Transfer Pricing, ESG Disclosure, Manufacturing Companies.*

ABSTRAK

Penelitian ini bertujuan untuk menguji pengaruh *Thin Capitalization* dan *Transfer Pricing* terhadap agresivitas pajak, serta menganalisis peran *Environmental, Social, and Governance* (ESG) disclosure dalam memoderasi hubungan tersebut. Fenomena agresivitas pajak melalui skema *Base Erosion and Profit Shifting* (BEPS) menjadi latar belakang penelitian ini, di mana praktik *Thin Capitalization* dan *Transfer Pricing* sering dikaitkan dengan upaya meminimalkan beban pajak yang berdampak pada penerimaan negara. Penelitian ini menggunakan pendekatan kuantitatif dengan data sekunder yang diperoleh dari laporan tahunan dan *Bloomberg ESG Database* perusahaan manufaktur yang terdaftar di Bursa Efek Indonesia (BEI) periode 2020–2023. Pengambilan sampel dilakukan dengan metode *purposive sampling*, menghasilkan total observasi penelitian yang dianalisis menggunakan Uji Regresi dan *Moderated Regression Analysis* (MRA) dengan bantuan perangkat lunak SPSS. Agresivitas pajak dalam penelitian ini diprosikan menggunakan Effective Tax Rate (ETR). Hasil penelitian menunjukkan bahwa *Thin Capitalization* dan *Transfer Pricing* berpengaruh negatif dan signifikan terhadap ETR, yang mengindikasikan bahwa peningkatan praktik tersebut justru menurunkan tingkat agresivitas pajak perusahaan. Temuan ini sejalan dengan *Signaling Theory*, di mana perusahaan cenderung mematuhi regulasi perpajakan untuk menjaga reputasi dan legitimasi. Namun, penelitian ini menemukan bahwa *ESG disclosure* tidak mampu memoderasi pengaruh *Thin Capitalization* maupun *Transfer Pricing* terhadap agresivitas pajak. Hal ini menunjukkan bahwa pengungkapan ESG berjalan terpisah dari keputusan strategis perpajakan perusahaan dan belum berfungsi efektif sebagai mekanisme kontrol terhadap praktik manajemen pajak.

Kata Kunci: Agresivitas Pajak, *Thin Capitalization*, *Transfer Pricing*, *ESG Disclosure*, Perusahaan Manufaktur.