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ANALYSIS OF THE EFFECT OF TRANSFER PRICING, THIN CAPITALIZATION AND GENDER DIVERSITY ON TAX A GGRESSIVITY WITH CORPORATE SOCIAL RESPONSIBILITY AS A MODERATION VARIABLE

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ABSTRACT

This study aims to examine the effect of transfer pricing, thin capitalization and gender diversity with Corporate Social Responsibility as a moderating variable on tax aggressiveness. This study uses mining sector companies listed on Indonesia Stock Exchange (IDX) during 2017-2021 period. Totals of the sample were 25 mining companies for 5 years. This study also analyzes the data using Panel Data Regression on EViews 12 software. The results of this study show that transfer pricing and thin capitalization have no effect on tax aggressiveness. Meanwhile gender diversity has a negative and significant effect on tax aggressiveness. The results also indicate that Corporate Social Responsibility does weaken the effect of transfer pricing and thin capitalization, but does not strengthen the effect of gender diversity on tax aggressiveness.

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INTRODUCTION

Tax is a form of mandatory contribution to the state by individuals and business entities based on applicable law and is coercive in nature without receiving direct compensation and is used for the interests of the state on the basis of people's welfare. Taxes are the largest source of state revenue in Indonesia. These tax revenues include Income Tax (PPh), Value Added Tax and Sales Tax on Luxury Goods (PPnBM), Land and Building Tax (PBB), Export Tax and Other Taxes (Central Statistics Agency, 2021). Every year the government always sets the APBN and APBD which are one of the reference targets for state revenue, including tax revenue. However, in the last 5 years tax revenue in Indonesia has not reached the set revenue target as stated in the tax revenue realization data table from 2017-2021 below.

Table 1. 1
National tax target and realization data

Year	Target	Realization	Realization Percentage
2017	1,539	1,265	82.19%
2018	1,473	1,323	89.81%
2019	1,618	1,518	93.81%
2020	1,786	1,548	86.52%
2021	1,404	1,285	91.52%

Table 1.1 shows data on national scale tax revenues and realization from 2016 to 2020. It can be seen that tax revenues have increased from year to year on average. However, the percentage of realization of revenue targets never reaches 100%. This condition is possible due to many causal factors, one of which is the efforts of the tax subject to avoid paying tax and minimizing the amount of tax owed. However, on the other hand, the government always tries to increase tax revenues and realize revenue targets (Alfarizi et al., 2020). This means that the government as the tax authority and companies as tax subjects have different interests.

Companies generally carry out tax planning to minimize their tax burden while still following the applicable regulations by exploiting the gaps and loopholes that exist in these regulations. However, in certain cases, some companies prefer to carry out tax avoidance or even tax evasion as a quick way to reduce the tax burden. Tax avoidance is a reduction in tax imposition using a strategy by exploiting loopholes in tax regulations, while tax evasion is a reduction in tax imposition by not remitting tax or paying and reporting but not with the actual total (Fitriani and Djaddang, 2021).

The aggressiveness of taxes carried out by companies in Indonesia can be seen, among other things, from cases of tax avoidance that have occurred. One of the cases of tax evasion in Indonesia occurred in 2019 by PT Adaro Energy Tbk. According to the international institution Global Witness in its 2019 investigation report on coal companies in Indonesia, PT Adaro Energy Tbk is suspected of allocating large amounts of profits to a network of multinational companies (offshore network) and minimizing tax payments. Tax aggressiveness allegedly carried out by PT Adaro Energy Tbk. reflected in the Cash Effective Tax Rate (CETR) value in 2014-2018 as in the following table.

Table 1. 2
CETR value of PT Adaro Energy Tbk. 2014-2018

Year	CETR
2014	0.260548776
2015	0.086547949
2016	0.349239476
2017	0.000105721
2018	0.000173698

Source: Data processed

From table 1.2 above it can be seen that during 2014 to 2018, PT Adaro Energy Tbk. indicated to be committing tax avoidance with the highest level of avoidance in 2017 amounting to 0.000105721 and the lowest level of avoidance in 2016 with a value of 0.349239476. The Cash Effective Tax Rate (CETR) value indicates aggressiveness or tax avoidance if the value is closer to 0. Apart from the title given by the Director General of Taxes to PT Adaro as "Golden Taxpayer", Global Witness stated that PT Adaro Energy Tbk. reduced the amount of tax owed which started when the company opened its network to Singapore and Mauritius. Tax reduction is carried out by transferring company profits to overseas companies and managing them in coal mining companies in Australia. By taking advantage of this tax haven country, the hundreds of millions of profits taken abroad by PT Adaro will not be taxed in Indonesia.

The case that occurred at PT Adaro Energy Tbk. This is not the first time this has happened in Indonesia. For example, PT Bentoel Internasional Investama is indicated to have avoided taxes in Indonesia by taking intra-company loans and paying back a number of fees to the UK for royalties, fees and services (Tax Justice Network, 2019). With foreign loans placed in countries with agreements, interest payments on loans can be used as a deductible expense on taxable income. Then for payments to the UK, because of the tax agreement between Indonesia and the UK, there is a 15% discount on trademark royalty tax. Due to this tax evasion, it is estimated that the state suffered losses of up to USD $14 million. The mining industry in Indonesia often receives preferential treatment by the government with various special policies. Through Minister of Finance Regulation (PMK) Number 259/PMK.04/2016, the government provides relief from import duties and Value Added Tax on imports of goods with contracts or work agreements for coal companies. Apart from that, there were other policies which were then issued to support the mining sector, such as Government Regulation Number 37 of 2018 concerning Tax Treatment and/or Non-Tax State Revenue in the Mineral Mining Business Sector which provides tax relief for mining businesses with refining facilities and Laws Law Number 3 of 2020 concerning Minerals and Coal which guarantees the extension of work contracts to become Special Mining Business Permits. However, it cannot be denied that the mining industry's contribution to the country's economy, especially in terms of taxation, is still not optimal.

The large number of companies operating in Indonesia that avoid taxes in various ways certainly has an impact on state tax revenues (Fitriani et al., 2021). Transfer pricing, for example, is a tax avoidance technique most often used by multinational companies (Hutomo et al., 2021). Transfer Pricing can be interpreted as financial and tax benefits obtained by using economic, financial and regulatory differences in other regions (Smith et al., 2011). The existence of these differences allows companies to carry out transactions at prices that are regulated in such a way as to facilitate tax avoidance (Fitriani & Djaddang, 2021). Wijaya and Rahayu (2021) in their research prove that transfer pricing positively influences tax aggressiveness. The government has actually prevented the practice of transfer pricing as a tax avoidance scheme by issuing Minister of Finance Regulation (PMK) Number 213/PMK.03/2016 concerning Types of Documents and/or Additional Information that Must be Kept by Taxpayers Carrying out Transactions with Parties. Have a Special Relationship. However, the information in question is only available to tax authorities and is not public information that investors can use to highlight the aggressiveness of transfer pricing carried out (Falbo and Firmansyah, 2018).

The Indonesian government has actually anticipated the practice of thin capitalization as a way to carry out tax aggressiveness. The existence of Regulation of the Minister of Finance of the Republic of Indonesia Number 169/PMK.010/2015 concerning Determining the Comparison Between Debt and Company Capital for the Purposes of Calculating Income Tax then limits the proportion of debt to company capital or debt to equity (DER) at 4:1. The existence of this regulation is expected to reduce the aggressiveness of corporate tax avoidance through capital debt. Not only Indonesia, various countries through their tax authorities have also issued regulations limiting the value of interest expenses which can reduce fiscal profits (Falbo and Firmansyah, 2018). This background is thought to influence research results that are different from previous research. One of them is research conducted by Bandiyono and Murwaningsari, (2019) which states that thin capitalization has no impact on tax avoidance. The difference in the results of this research is still a problem in research on thin capitalization as a way to minimize the tax burden.

The existence of a two-tier leadership system for companies in Indonesia means that the board of directors and commissioners jointly provide direction and supervision to management to carry out their duties in accordance with the instructions given by the company owner (Hudha & Utomo, 2021). In the "Woman in Tax" seminar, Ministry of Finance Sri Mulyani said that if women were given more opportunities to play a role in the economy, it would have a big impact on the global economy, even up to 1.7 trillion Rupiah in 2025. Furthermore, the role of women in the board of directors and commissioners considered to have an influence on company performance.

One of the company's obligations is not only to fulfill the wishes of shareholders, but also to fulfill the company's obligations to society, the environment and society. However, the company must maintain its financial stability and reputation. It can be ascertained that aggressive tax behavior does not reflect the company's social obligations. In short, it can be explained that companies have tax obligations that must be fulfilled as well as the obligation to imply Corporate Social Responsibility (CSR) as a form of corporate social responsibility (Makhfudloh et al., 2018). Lanis and Richardson (2012) found a link between CSR implementation and tax avoidance. There is little possibility for companies that realize their social obligations through CSR programs to avoid taxes, because the two are contradictory behaviors. Ortas and Alvarez (2020) in their research also stated that companies with a high level of implementation of social, environmental and governance obligations tend to avoid tax aggressiveness.

Based on this background, researchers are interested in examining the determination of tax aggressiveness using several independent variables. This research examines the independent variable transfer pricing which was previously researched by Wijaya and Rahayu (2021), the thin capitalization variable which was researched by Falbo and Firmansyah (2018), and the gender diversity variable which was researched by Lanis and Richardson (2018). This

research is different from previous studies, namely the existence of the Corporate Social Responsibility variable as a moderating variable. Apart from that, researchers used different research samples, where this research conducted research on mining sector companies listed on the Indonesia Stock Exchange during the 2017-2021 period.
Based on this, this research was designed with the title "Analysis of the Effect of Transfer Pricing, Thin Capitalization, and Gender Diversity on Tax Aggressiveness with Corporate Social Responsibility as a Moderating Variable".

THEORY AND HYPOTHESIS DEVELOPMENT

A. Grand Theory

1. Agency Theory

This theory was first developed by Jensen and Meckling (1976). Agency Theory is defined as a relationship that occurs because of a contract between the agent (management) and the principal (company owner or shareholder). In this theory, it is stated that there could be information asymmetry that occurs between the principal and the agent who represents the company management (Nainggolan and Sari, 2019). This problem can arise because the decisions made by the agent are not always in favor of the company's interests, which then triggers agency conflict (Jensen and Meckling, 1976).

*Agency Conflict*Generally, it can take the form of individualistic actions on the part of both parties, in order to gain benefits for their parties and override the interests of the company. Apart from that, management as the agent who manages the company has wider information than the owner (principal) which can then trigger conflict. This conflict occurs because of differences in interests between owners and managers. Company owners tend to prioritize company profitability, while management will tend to prioritize performance from various aspects.

The resulting conflict of interest provides encouragement for management to maximize profit management both from an accounting and fiscal perspective by exploiting regulatory loopholes and tax rates (Nainggolan and Sari, 2019). Gaps in tax regulations and the implementation of a self-assessment system are opportunities for agents to minimize the company's tax burden by reducing the amount of taxable income. It cannot be denied that the self-assessment system opens up opportunities for tax planning because taxpayers can record, calculate and report taxation independently. The agent can take this action because he has more information regarding the company.

2. Legitimacy Theory

Legitimacy theory explains the social contract that exists between companies and the community which has allowed the company to operate and utilize the resources available around the community (Ghozali and Chairiri, 2007). Dowling and Preffer as adapted by Makhfudloh et al. (2018) explained that legitimacy theory discusses company business activities carried out by paying attention to social norms and values as boundaries that give rise to the interest in organizational behavior that pays attention to the environment. This theory is based on the premise that the sustainability of a company or organization will continue if the surrounding community understands that the company has a value system that is in harmony with the values that exist in society.

The implementation of Corporate Social Responsibility (CSR) should have an impact on reducing the level of aggressiveness of tax avoidance. This is because tax is state income intended for the benefit of the wider community, tax avoidance by companies seems contradictory to corporate social responsibility.

***B.* Literature Review**

1. Tax Aggressiveness

(Frank et al., 2009) defines tax aggressiveness as actions taken by companies in order to reduce taxable profits by using tax planning, both legal and illegal. Meanwhile, Lanis and Richardson (2012) state that tax aggressiveness is a scheme created to avoid the tax burden. Legal tax planning actions are usually carried out through tax avoidance by exploiting loopholes in existing tax regulations in order to minimize the tax owed.

2. Transfer Pricing

*Transfer pricing*is a company's action in determining the price of a transaction of goods, intangible assets, services, or financial transactions between companies (Ministry of Finance, 2014). According to Hansen and Mowen (2015), transfer pricing is defined as the price set by the sales division for the purchasing division within the scope of a company or group of companies (group). Meanwhile, in Wibowo's research (2021), transfer pricing is defined as the taxpayer's actions in determining prices in buying and selling resources with certain parties in all transactions with related parties including buying and selling tangible and intangible assets, services, financing, etc. others, and is characterized by a special relationship between the two parties of the company. Transfer pricing is actually interpreted as something that is neutral, but often this activity is connoted as a negative and "pejorative" thing which is often connected with the transfer of taxable income in multinational companies to subsidiaries or affiliates located in other countries with low tax rates (Dharmawan et al., 2017).

3. Thin capitalization

Company financing, whatever its form, will have an impact on the company's fiscal profit. In an effort to minimize the tax burden, management will of course use the right scheme, namely by dominating debt rather than ownership capital because tax regulations in Indonesia allow interest expenses to be a deduction from fiscal profits (deductible), both those that have been paid and those that are still interest debt. On the other hand, if the company's capital structure tends more towards equity, there is no deduction from the income obtained from dividend distribution because dividend distribution is non-deductible (Falbo and Firmansyah, 2018). The definition of thin capitalization is the condition of a company with financing through debt that is higher than equity or owner's capital (OECD, 2012). Under these conditions, companies are usually more likely to be 'directed' or have high leverage. Debt financing will have a negative impact on taxable income. (Modigliani & Miller, 1963) assume that liabilities can be a tax shield that can increase company value. High thin capitalization can be an indication of the company's tax avoidance.

4. Gender diversity

Lanis & Richardson (2018) stated that generally, when compared to male commissioners, female commissioners will show a more independent mindset. The presence of women on the board of directors and commissioners supports feminist theory which states that women's degrees should be equal to men's degrees in various things, including work and position. In nature theory, it is explained that men and women have natural biological and characteristic differences (Maghfiroh and Utomo, 2019). In research (Duong & Pallasch, 2021) it is stated that there are significant differences between male and female boards in making financial decisions, where women will tend to pay attention to other things outside of financial interests while men will only be concerned with profit and career path. without considering the ethics of the decision. Women tend to be careful about risks, which of course will influence the level of thoroughness and careful supervision by the board of commissioners over decision making by the board of directors (Demos & Muid, 2020). Research related to gender diversity as part of the company structure shows that the role of female directors in the decision-making process can be one of the CSR implications in companies (Vacca et al., 2020).

5. Corporate Social Responsibility

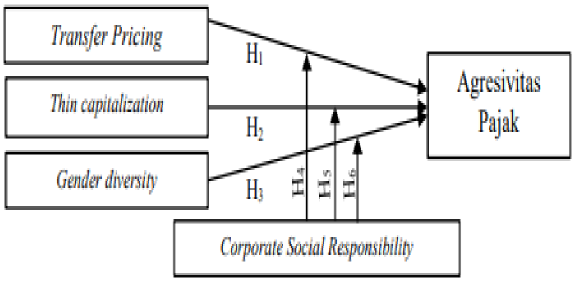
Corporate Social Responsibility(CSR) is a company action as a form of corporate responsibility towards the environment and social (Putri & Mulyani, 2020). Limited Liability Company Law No. 40 of 2007 in article 1 paragraph 3 defines CSR as "social responsibility" with the definition "the company's commitment to participate in sustainable economic development in order to improve the quality of life and the environment which is beneficial, both for the company itself and the local community , as well as society in general". CSR is a scheme for companies to integrate social and environmental issues in operations and relationships with shareholders on a voluntary basis. CSR is considered to be a factor in the sustainability and success of a company (Lanis & Richardson, 2012).

The implementation of CSR should encourage companies not only to focus on maximizing profits for the sake of shareholders, but also to pay attention to the interests of all parties involved in the running of the company (Putri & Mulyani, 2020). Corporate Social Responsibility (CSR) disclosure can be measured using the 4th generation (G4) Global Reporting Initiative

(GRI) index which consists of 91 performance indicators in 3 categories (economic, environmental and social). The greater the index value for a company means the higher the implementation and disclosure of Corporate Social Responsibility (CSR) by that company.

METHOD

The author describes the research framework in Figure 2.1 below.



C. Hypothesis Development

1. *Transfer pricing*against tax aggressiveness

*Transfer pricing*is one of the methods most widely used by corporate taxpayers as an effort to reduce the tax burden. The existence of differences in regulations, economic conditions of countries, and other juridical conditions in the countries where subsidiaries or company branches are located provides opportunities for companies to escape their profits from taxation. The research results of Putri and Mulyani (2020) prove that there is a positive influence of transfer pricing on tax aggressiveness. In line with this research, research by Fitriani, Djajang and Suyanto (2021) states that transfer pricing is proven to have a positive influence on tax aggressiveness.

The same results were also obtained in Wijaya & Rahayu's (2021) research, where transfer pricing was proven to have a significant positive influence on tax aggressiveness. However, several previous studies had results that were inconsistent with these studies. In research by Panjalusman et al., (2018), the results showed that transfer pricing had an insignificant effect on tax aggressiveness. Meanwhile, in the research of Athira Hutomo et al. (2021) transfer pricing is considered to have no influence on tax aggressiveness. Based on the description above, there are still inconsistencies in the results of previous research regarding the influence of transfer pricing on tax aggressiveness. The researcher then formulated an alternative hypothesis as follows.

H1: Transfer pricing has a positive effect on tax aggressiveness.

2. *Thin capitalization*against tax aggressiveness

The strategy of financing with debt or thin capitalization has an impact on the amount of taxable income. In line with agency theory where management will try to realize the wishes of the company owner and minimize the risks that must be borne, thin capitalization allows management to reduce the tax burden and increase net profit. By financing through higher debt, the company will also bear a higher debt interest burden. Higher interest expenses will reduce the company's profit before tax which of course will also reduce the company's tax burden. Nainggolan & Sari (2019) stated that Thin capitalization practices with higher intensity will tend to indicate companies are engaging in tax avoidance. Based on the description above, the researcher then formulated an alternative hypothesis as follows.

H2: Thin capitalization has a positive effect on Tax Aggressiveness.

3. *Gender diversity*against tax aggressiveness

*Gender diversity*is part of the diversity of the board of directors which is often the object of research. The diversity referred to refers more to the presence of a board of directors and female commissioners on the board. It is hoped that the presence of women on the company's board of directors and commissioners can contribute to providing other perspectives and efforts to reduce the risk of decision making (Hudha & Utomo, 2021).

Research conducted by Rahman (2021) states that from the results of the tests carried out, gender diversity has no effect on tax aggressiveness. This statement is in line with the results of research by Duong & Pallasch (2021) which states that the presence of a female board of directors tends to have a negative effect on tax aggressiveness. This was also stated in research by Hudha & Utomo (2021) which stated that the existence of gender diversity has a significant negative effect on tax aggressiveness. Based on the description above, the researcher then formulated an alternative hypothesis as follows.

H3: Gender diversity has a negative effect on tax aggressiveness.

4. *Transfer pricing*tax aggressiveness is moderated by Corporate Social Responsibility (CSR)

Corporate Social Responsibility(CSR) is a series of concepts and actions as a form of corporate responsibility towards the social environment that is directly related to the founding of the company. Companies that implement CSR will provide reports as information to the public regarding sustainable development and good plans that the company wants to carry out in the future (Behringer & Krisztina (2016) in Putri & Mulyani (2020)). The existence of this information provides a signal that can increase stakeholders' and shareholders' trust in the company.

Research by Nugroho & Meiranto (2015) shows that CSR has a significant negative effect on tax aggressiveness. This means that the higher the company's CSR implementation, the lower the level of corporate tax aggressiveness. Meanwhile, the use of transfer pricing as a way to reduce the tax burden is an action that will harm the social environment, damage reputation and affect the legitimacy of the company on a larger scale.

Based on the description above, the researcher then formulated an alternative hypothesis as follows.

H4: Corporate Social Responsibility (CSR) weakens the influence of transfer pricing on tax aggressiveness.

5. *Thin capitalization*tax aggressiveness is moderated by Corporate Social Responsibility (CSR)

Company management is required to provide what shareholders want in various ways. One scheme that is often adopted is to reduce the tax burden so that the net profit obtained is greater than it should be. In the world of taxation, it is known as deductible expense, which includes interest charges on loan debt. With the existence of regulations regarding this matter, it is not uncommon for management to increase debt in order to reduce the tax burden through interest which becomes a tax deduction. But of course, this is against the law and is high risk.

Because tax aggressiveness schemes or actions to minimize taxes on companies are often carried out in large companies, companies should disclose CSR implementation in their annual reports so that public trust can be generated (Dewa et al., 2015). This reporting must be done because tax aggressiveness is not in line with CSR objectives to encourage development and prosperity (Nugraha & Meiranto, 2015). The research results of Fitriani et al. (2021) shows that the higher the level of CSR reporting will have an impact on the lower level of tax aggressiveness in companies. The existence of CSR principles applied in companies is expected to be able to suppress intentions to carry out aggressive tax avoidance, one of which is by means of thin capitalization.

Based on the description above, the researcher then formulated an alternative hypothesis as follows.

H5: Corporate Social Responsibility (CSR) weakens the effect of thin capitalization on tax aggressiveness

6. *Gender diversity*tax aggressiveness is moderated by Corporate Social Responsibility (CSR)

There are differences in the characteristics of male and female board of directors and commissioners. Naturally, women are more careful and tend to pay attention to details. More comprehensive characteristics of women and other added values place women in the top positions that deserve to be given (Rahman, 2021). Richardson et al. (2018) stated that the supervisory characteristics of the board of commissioners have a relationship with tax aggressiveness.

In implementing Corporate Social Responsibility (CSR), one of the aspects to pay attention to is equality and anti-discrimination. To be precise, in the CSR disclosure standards issued by the Global Reporting Initiative (GRI-G4), there are aspects of Diversity and Equal Opportunity disclosure which reveal the diversity of the composition of a company's human resources. Furthermore, the GRI-G4 standard is also required to disclose the composition of the company's board of directors and independent commissioners. The presence of an independent board of commissioners related to decision making will increase the relationship between CSR and tax aggressiveness (Lanis & Richardson, 2018).
Based on the description above, the researcher then formulated an alternative hypothesis as follows.

Research methods

This research is quantitative research with secondary data sources. The data used is in the form of company financial reports obtained from the official website of the Indonesia Stock Exchange (BEI) in 2017-2020. The population in this study are mining sector companies registered on the idx.co.id page. To determine the sample, this research used a purposive sampling technique with several relevant criteria. Hypothesis testing was carried out using Eviews version 12 software. To obtain the data needed in this research, researchers used two methods, namely the documentation or archiving method and literature study.

a. Documentation method
   The secondary data needed in this research was obtained using documentation or archiving methods. This method is carried out by studying secondary data obtained, which is then recorded and calculated. Secondary data collection was obtained from the Indonesian Stock Exchange websitewww.idx.co.id as well as the official pages of related companies.
b. Literature review
   Researchers collect data that is relevant to research issues through books, the internet, journals, theses and other media related to the research title.

In this research, the population was 49 companies in the mining sector listed on the Indonesia Stock Exchange (BEI). Meanwhile, the sample in this study was taken using a purposive sampling method with the following conditions.

a. Mining companies listed on the Indonesian Stock Exchange during the 2017-2021 period
b. Mining companies that were not delisted during 2017-2021
c. Mining companywhich did not experience losses during 2017-2021
d. Mining companies with complete financial report data relating to research variables in 2017-2021

This research uses the mining sector as a research sample because this sector is one of the sectors that is often reported to be carrying out aggressive tax avoidance. It is proven that in 2017 at least 3,202 mining companies in Indonesia did not have a NPWP, as well as many allegations of tax aggressiveness practices carried out by mining companies.

Research variable

Dependent Variable (Y)

1. **Tax Aggressiveness**
   Tax aggressiveness is management's strategy and behavior in minimizing the company's tax burden in order to optimize net profit and dividends received by shareholders. Lanis and Richardson (2012) describe tax aggressiveness as a scheme created to avoid the tax burden. Tax aggressiveness broadly includes tax planning, tax avoidance and tax evasion. So the tax aggressiveness carried out by companies has the potential to harm both the state and the company if it violates the law and is subject to sanctions. Whatever the form, tax aggressiveness certainly reduces the tax revenues that should be received by the state.
   Several previous studies used the Effective Tax Rate (ETR), such as research by Lanis and Richardson (2015), Makhfudloh et al. (2018), and Fitriani (2020). However, in this research, tax aggressiveness is proxied by the Cash Effective Tax Rate (CETR) which is used in Demos and Muid's (2020) research to test the probability of using other proxies.

$$CETR = \frac{\text{Tax burden paid}}{\text{profit before tax}}$$

Independent Variable (X)

1. ***Transfer Pricing***

   *Transfer pricing*is the determination of prices for goods or services provided to other parts or branches of a company (Apriyani, 2021). Transfer pricing can be carried out both to other parts (sub-units) of the company in the same region or in different regions. Generally, transfer pricing carried out by companies outside their region or country takes advantage of differences in political, economic and regulatory conditions that allow companies to take advantage, one of which is in terms of taxation. Previous studies have tested transfer pricing using different proxies.

   Lanis and Richardson's (2012) research uses sum score measurements of the designed indicators. This proxy was then applied in subsequent research by Falbo and Firmansyah (2018) and Wijaya and Rahayu (2021). There is another proxy that has recently been used in previous research, namely using the comparison of related party receivables to total receivables, as used in research by Heiranti and Chairina (2019), Apriyani (2021), and Nuryatun (2020). Therefore, in this research transfer pricing is proxied using the following formula.

$$TP = \frac{\text{Trade receivables from related parties}}{\text{Total Receivables}}$$

2. ***Thin capitalization***

   *Thin capitalization*can be interpreted as the proportion of financing in a company to fund its business operations with the use of debt that is greater than equity (Blouin et al, 2013). The interest costs charged to the company are deductible expenses which can reduce taxable profits. So this method is allegedly used by corporate taxpayers to avoid tax. Previous research conducted by experts used several ratios as proxies for thin capitalization. Several previous studies used the debt to equity (DER) proxy, namely the comparison of debt to equity to measure the risk of tax aggressiveness carried out by companies through thin capitalization (Nainggolan, 2019). However, in this research, the proxy used is the MAD Ratio to measure thin capitalization which was also used in Lanis and Richardson's (2012) research and adapted by Falbo and Firmansyah (2018). This proxy is used because it is considered more specific in measuring thin capitalization.

$$MAD = \frac{Average\ debt}{SHDA}$$

   Information :

MAD	: Maximum Allowable Debt
Average debt	: average total debt
SHDA	: Safe harbor debt amount

   The SHDA calculation can be seen in the following formula.

   $SHDA = average\ assets - Non\ interest\ bearing\ liability \times 80\%$

   In Lanis and Richardson's (2012) research and previous studies, the percentage used for SHDA was 75%. However, due to provisions in Indonesia regulated in PMK Number 169/PMK.010/2015 which only allow a DER ratio of 4:1, in this study a percentage value of 80% was used.

3. ***Gender diversity***

   Diversity is the difference, abnormality, diversity that exists in an environment. Meanwhile, gender is the activities, roles, attributes and behavior that are characterized by men and women (Demos, 2020). Men and women have different mindsets, characteristics and leadership which in their position in the company will influence the decision making process. In gender theory, the natural nature of women is that they tend to want to suppress risks, are more emotional and tend to feel nervous and worry about failure. Due to this natural characteristic, having a female board of directors is considered to reduce the tendency for agents' pragmatic behavior, including tax aggressiveness. The results of Hudha's research (2021) show that there is an influence of female board of directors on lower tax aggressiveness. Lanis et al., (2018) in their research also found that the presence of a female board of directors and commissioners had a significant negative effect on tax aggressiveness. In this research, the gender diversity variable is a dummy variable, namely a measurement using numbers that represent the condition of the sample. If a company has a female board of directors or commissioners, it will be denoted by the number 1 (one). Meanwhile, if there is no female board of directors or commissioners found in the company, it will be denoted by the number 0 (zero).

Variable (Z)

1. Corporate Social Responsibility (CSR)

Corporate Social Responsibility(CSR) is a company action as a form of corporate responsibility towards the environment and social. Corporate Social Responsibility (CSR) is an idea applied to companies to carry out responsibilities towards the environment, social and community which are not limited to programs aimed directly at the community, but rather all responsibilities related to the common good by utilizing existing resources in the community. within the company. Generally, disclosure of CSR components in the annual report is an obligation for companies that have been listed on the stock exchange.

In this research, Corporate Social Responsibility (CSR) is measured using the CSR disclosure index. Index calculations can be done using content analysis which converts qualitative information into quantitative. The calculated index is then explained on a dichotomous scale, namely giving the number 1 for CSR indicators that are disclosed, and the number 0 for indicators that are not disclosed in the company's annual report. The formula for measuring Corporate Social Responsibility (CSR) used is as follows (Makhfudloh, 2018).

$$CSRIi = \sum \frac{Xyi}{ni}$$

Information:

CSRIi: company Corporate Social Responsibility index i
$\sum Xyi$: total indicator score 1 = indicator disclosed, 0 = indicator not disclosed
here : Number of indicators.

RESULTS AND DISCUSSION

1. Descriptive statistical analysis

Descriptive statistical analysis is used to describe data regarding respondent characteristics, respondent demographics, and describe the results of the research. In this research, descriptive statistics are used to explain the distribution of scores (lowest, average and highest) and standard deviation of secondary data.

2. Determination of the estimation model

In regression testing using the panel data method, it is necessary to determine the estimation model using the following three approaches.

a. Common Effect or Pooled Least Square (PLS)

This model is the simplest panel data model approach because it only combines time series and cross section data. This model does not pay attention to time or individual dimensions so it is assumed that the behavior of company data is the same in various time periods. This method can use the Ordinary Least Square (OLS) approach or small box technique to estimate panel data models.

Tabel 4. 3 Estimasi *Common Effect Model* (CEM)

Variable	Coefficient	Std. Error	*t-statistic*	Prob.
TP	0.016549	0.052975	0.312399	0.7553
MAD	-0.269329	0.181229	-1.486129	0.1398
GD	0.612936	0.197702	3.100294	0.0024
C	-1.574841	0.187391	-8.404034	0.0000
R-Squared		0.082315		
Adj. R-Squared		0.059563		
Prob.(F-Statistic)		0.015197		

Sumber: Output EViews 12 diolah

b. Fixed Effects Model (FEM)

This model assumes that differences between data can be accommodated from differences in intercepts. Fixed effects modeling is a technique for estimating panel data using dummy variables to capture differences in intercepts. In addition, this model also assumes that the regression coefficients are constant between companies and time. This approach with dummy variables is known as least squares dummy variables (LSDV).

Tabel 4. 4 Estimasi *Fixed Effect Model* (FEM)

Variable	Coefficient	Std. Error	*t-statistic*	Prob.
TP	-0.145284	0.063106	-2.302233	0.0235
MAD	0.036784	0.345379	0.106504	0.9154
GD	0.553209	0.274021	2.018860	0.0463
C	-1.691742	0.229608	-7.367970	0.0000
R-Squared		0.000000		
Adj. R-Squared		0.385192		
Prob.(F-Statistic)		0.000000		

Sumber: Output EViews 12 diolah

c. Random Effect Model

In this model panel data is estimated where disturbance variables may be interrelated over time and between individuals. In the random effect model, differences in intercepts are accommodated by the error terms for each company. The advantage of using this model is that it eliminates heteroscedasticity. This model is also known as the Generalized Least Square (GLS) technique.

In the panel data analysis method, there are tests to choose the right method, namely the Chow Test, Hausman Test, and Lagrange Multiplier Test.

Tabel 4. 5 Random Effect Model

Variable	Coefficient	Std. Error	*t-statistic*	Prob.
TP	-0.068484	0.054412	-1.258615	0.2106
MAD	-0.200710	0.228353	-0.878947	0.3812
GD	0.590762	0.220882	-2.674559	0.0085
C	-1.683759	0.228422	-7.371262	0.0000
R-Squared		0,173007		
Adj. R-Squared		0.120024		
Prob.(F-Statistic)		0.026619		

Sumber: Output EViews 12 diolah

a) Test Chow

This testing stage serves to test whether the PLS model or FEM model can be used in estimation. Testing was carried out using the restricted F-test. There are two hypotheses in the Chow test, namely:

H0: Common effect model (PLS)

H1: Fixed effect model (FEM)

In other words, if the probability value (P-value) is < 5%, or F-count > F-table, then H0 is rejected, so the best model to use is the fixed effect model (FEM). Vice versa. However, if H0 is rejected, the FEM model used must be tested again to determine the FEM model or Random Effect Model (REM) that must be used before carrying out the analysis.

b) Hausman test

The Hausman test is used to select the best model between the fixed effect model (FEM) or the random effect model (REM). This Hausman test is based on the idea that Least Squares dummy variables (LSDV) in the fixed effect method and Generalized Least Square (GLS) in the

Random effect method are efficient while Ordinary Least Squares (OLS) in the Common Effect method are inefficient. If the Hausman statistic is greater than the critical Chi-Square value, then H0 is rejected, which means that the correct panel data regression model is the Fixed effect model. On the other hand, if the Hausman statistic is smaller than the critical value of Chi-Squares then H0 is accepted, which means that the appropriate model for panel data regression is the REM model.

c) Lagrange Multiplier (LM) Test

The Lagrange Multiplier test is carried out to compare the Common Effect Model (CEM) or Random Effect Model (REM) which is more suitable for use in a panel data regression test. There are several methods that can be used in the Lagrange Multiplier test, one of which is Breusch-Pagan which is often used in research. In this test, if the cross-section value is < α (0.05) then the better model to use is Random Effect. On the other hand, if the cross-section value is > α (0.05), then the better value to choose is the Common Effect.

3. Classic assumption test

The classical assumption test is carried out to test whether the model used is in accordance with the classical assumptions. Testing was carried out by carrying out multicollinearity tests, heteroscedasticity tests, and normality tests.

1) Normality test

Normality testensure that in the regression model, the residual variables have normally distributed values. The purpose of carrying out a normality test is to test whether errors in research data are normally distributed or not.

In testing with eviews software, normality tests can be carried out using Skewness/Kurtosis. If the probability value is > α(0.05), then it can be said that the data is normally distributed. According to Ghozali (2013), a good regression model is accompanied by data that is normally distributed or close to normal.

2) Multicollinearity Test

Multicollinearity is defined as a condition where one or more independent variables can be expressed as a collinear combination of other variables. The multicollinearity test was carried out to detect the existence of a correlation between the independent variables. The expected results are free of bias and must not have a linear relationship between independent variables (Ghozali, 2013). Multicollinearity testing can be done by testing the Variance Inflator Factor (VIF), provided that if the VIF is > 10 or if the correlation value is greater than 0.90 then there is a multicollinearity problem between the independent variables.

3) Heteroscedasticity Test

Heteroscedasticity is the inequality of residual variance from one test to another. Heteroscedasticity in a test model can make the estimation inefficient.

Heteroscedasticity testing can be done in several ways, namely the Breusch Pagan Godfrey test, Harvey test, Glejser test, ARCH test and White test. If the significance value is greater than 0.05 then the regression model is free from heteroscedasticity (Ghozali, 2013).

4. Hypothesis testing

In this research, hypothesis testing was carried out using the panel data regression analysis method. The aim is to see the influence of the independent variable on the dependent variable. To determine the simultaneous effect, an F test was carried out, while to determine the partial effect the T test was used. Meanwhile, to see the magnitude of the independent variable in explaining the dependent variable, a coefficient of determination test was carried out. The regression equation used in this research is formulated as follows.

Model I: $Y = \alpha + \beta 1TPit + \beta 2TCit + \beta 3GDit + e$

Information:

Y = Tax aggressiveness
α = constant
β = coefficient
TPit = transfer pricing
TCit = thin capitalization

GDit = gender diversity
e = error

Tabel 4. 13
Hasil Regresi Model 1

Variable	Coefficient	Std. Error	*t-statistic*	Prob.
TP	-0.068484	0.054412	-1.258615	0.2106
MAD	-0.200710	0.228353	-0.878947	0.3812
GD	0.590762	0.220882	2.674559	0.0085
C	-1.683759	0.228422	-7.371262	0.0000

Note: Dependent Variable: TAG
Sumber: Data diolah EViews 12

Meanwhile, to see the moderating effect of the Corporate Social Responsibility (CSR) variable on the influence of the independent variables on the dependent variable, an interaction moderation variable test was carried out. Where in this test it is said that the moderating variable can strengthen or weaken the influence of the independent variable on the dependent variable. In this research, the regression equation for the hypothesis with moderating variables is as follows.
Model II:

$$Y = \alpha + \beta 1TPit + \beta 2TCit + \beta 3GDit + \beta 4(TPit * CSRit) + \beta 5(TCit * CSRit) + \beta 6(GDit * CSRit) + e$$

Information:
Y = Tax Aggressiveness
α = Constant
β = Regression coefficient
TPit = Transfer pricing
TCit = Thin capitalization
GDit = Gender diversity
CSRit = Corporate Social Responsibility
e = Error

Tabel 4. 14
Hasil Regresi Model 2

Variable	Coefficient	Std. Error	*t-statistic*	Prob.
TP	0.043844	0.113459	0.386430	0.6999
MAD	0.187797	0.633668	0.296365	0.7675
GD	0.831506	0.422754	1.966878	0.0515
TP_CSR	0.091949	0.085249	1.078601	0.2830
MAD_CSR	0.359732	0.521414	0.689917	0.4916
GD_CSR	0.253368	0.318839	0.794659	0.0428
C	-1.641969	0.221139	-7.425061	0.0000

Note: Dependent Variable: TAG
Sumber: Data diolah EViews 12

5. *TestGoodness of Fit Model*

Goodness of Fit Model testing was carried out to see the model's ability to describe the correlation between variables.

d. Coefficient of determination test (R2)

Tabel 4. 15
Hasil Uji Koefisien Determinasi

R-Squared
0,173007

Sumber: *Output* EViews diolah

The coefficient of determination basically measures how far the model's ability to explain variations in the dependent variable. The coefficient of determination value is between zero (0) and one (1). A small R2 value means that the ability of the independent variable to explain variations in the dependent variable is very limited. A value close to one means that the independent variable provides almost all the information needed to predict the dependent variable (Ghozali, 2017).

e. F Statistical Test

Tabel 4. 16
Hasil Uji Statistik F

Prob(F-Statistic)
0,026619

Sumber: *Output* EViews 12 diolah

The F test is carried out to see whether the inner model in the regression of the independent variable and dependent variable is feasible or not. If calculated F ≥ F table or the probability value is smaller than 5% (0.05), then it can be concluded that together the independent variables have a significant effect on the dependent variable. On the other hand, F count ≤ F table or the probability value is greater than the significant value of 5% (0.05), so it can be concluded that together the independent variables have no significant effect on the dependent variable (Ghozali, 2017).

f. Statistical Test t

Tabel 4. 17
Hasil Uji Statistik t

Variable	*Coefficient*	*Std. Error*	*t-statistic*	*Prob.*
C	-1.683759	0.228422	-7.371262	0,0000
TP	-0.068484	0.054412	-1.258615	0,2106
TC	-0.200710	0.228353	-0.878947	0,3812
GD	0.590762	0.220882	2.674559	0,0085
TP*CSR	0,091949	0.085249	1.078601	0.2830
TC*CSR	0,359732	0.521414	0.689917	0.4916
GD*CSR	0,253368	0.318839	0.794659	0.0428

Note: dependen variabel TAG
Sumber: Data *Output* EViews 12 diolah

The t test is carried out to assess the influence of an independent variable partially on the dependent variable. Hypothesis measurement is carried out by looking at the probability value and significance value. If the value of prob. > 0.05, then H0 is accepted and the alternative hypothesis (H1) is rejected. Meanwhile, if prob. < 0.05, then H0 is rejected and the alternative hypothesis (H1) is accepted (Ghozali, 2017). This test was carried out with a confidence level of 95% and an error of 5%.

DISCUSSION

1. The Effect of Transfer Pricing on Tax Aggressiveness

Based on table 4.12, the test results show that the transfer pricing probability value is 0.2106 which is greater than 0.05. This result has a coefficient value of -0.068484 and a t-statistic of -1.258615 which is negative. Thus, H0 is accepted and H1 is rejected or it can be interpreted that transfer pricing does not have a significant effect on tax aggressiveness.

The results obtained are in line with previous research conducted by Falbo and Firmansyah (2018) which stated that transfer pricing has no effect on tax avoidance. This result could occur due to several possibilities, one of which is the lack of research samples which are only represented by companies in certain sectors. Certain sectors in Indonesia have the characteristic of carrying out transfer pricing not to avoid taxes, but purely to optimize performance (Falbo&Firmansyah, 2018).

These results also support research by Nuryatun and Mulyani (2020) which states that transfer pricing has no effect on tax aggressiveness. Agency theory explains that company agents are required to be able to meet shareholders' expectations regarding company profitability. Therefore, management often manipulates financial reports and minimizes the taxes owed. One of them is indicated by transfer pricing. However, this scheme will actually reduce shareholders' expectations of getting a share of profits from the company (Nuryatun and Mulyani, 2020). The results of this research contradict research conducted by Wijaya and Rahayu (2021) and research by Herianti and Chairina (2019) which states that transfer pricing has a significant effect on tax aggressiveness. Differences in the results of this research could be caused by differences in applicable regulations, differences in population and sample characteristics, and differences in research methods.

2. The Effect of Thin Capitalization on Tax Aggressiveness

The results of the t statistical test in table 4.12 show that the thin capitalization (TC) variable has a probability value of 0.3812 which is greater than 0.05. The coefficient on the TC variable has a value of -0.2007 and a t-statistic value of -0.878947. Thus, it is proven that thin capitalization does not have a significant effect on tax aggressiveness partially. Therefore, H2 is rejected. The results of this research are in line with previous research conducted by Bandiyono and Murwaningsari (2019) which stated that thin capitalization has no effect on tax avoidance. The results of this research also support research by Nainggolan and Sari (2019) which states that thin capitalization is not proven to influence tax aggressiveness. This can be caused by the condition of the majority of companies in Indonesia which prefer equity as a financing option (Nainggolan and Sari, 2019). Apart from that, the effectiveness of regulations that determine the ratio of equity to liabilities in Indonesia could also be one of the causes.

In agency theory, company management as agents will maximize the profits that can be obtained for the company and also the principal. It is no exception that management chooses to plan or avoid taxes to maximize company profits. However, in the results of this research, it is not proven that there are schemes carried out by agents to reduce the tax burden and maximize profits.

The results of this research contradict research conducted by Andawiyah et al., (2019) which proves that the practice of thin capitalization influences tax aggressiveness. The results of the research conducted are also different from research by Taylor and Richardson (2012) which states that thin capitalization has an effect on tax avoidance. This difference in results may be due to differences in research objects. In Falbo and Firmansyah's (2019) research, the research used manufacturing companies registered on the IDX. Meanwhile, the object of this research is mining sector companies. Apart from that, different research results can also be caused by differences in the proxies used. This study uses the MAD proxy which has been adjusted to tax regulations in Indonesia, which is different from the MAD proxy used by Taylor and Richardson (2012).

3. The Effect of Gender Diversity on Tax Aggressiveness

Based on the data in table 4.12, the independent variable gender diversity on tax aggressiveness has a probability value of 0.0085 which is smaller than 0.05. The coefficient in this test has a value of 0.590762 and a t-statistic value of 2.674559 which shows a positive direction. It can be interpreted that a score of 1 on the gender diversity variable coincides with a high CETR value, which indicates low tax aggressiveness. Thus, H3 is accepted, where gender diversity has a significant negative effect on tax aggressiveness.

These results support the research of Lanis et. al. (2017) which states that the presence of a female board of directors has a negative and significant effect on tax aggressiveness. The results of this research are also in line with research by Hudha and Utomo (2021) which found that gender diversity has a significant effect on corporate tax avoidance. The presence of women on the board of commissioners and directors is a form of anti-discrimination and gender equality. According to Duong & Pallasch (2021), there are significant differences between male and

female boards in making financial decisions, where women tend to pay attention to things other than financial interests.
However, these results are not in line with research by Cortellese (2020) and research by Mala and Ardiyanto (2021) which states that gender diversity of the board of directors has no significant effect on tax avoidance. This difference can be caused by several factors, one of which is the difference in the objects used in research. Cortellese's research (2020) examined companies from various countries listed on the EIKON publish, Mala and Ardiyanto's research examined banking companies listed on the BEI in 2014-2018, while this research used mining sector companies listed on the BEI during 2017-2021 . Apart from that, differences in testing methods can also have an influence. Because in Mala and Ardiyanto's (2021) research, the moderated regression analysis test method was used with SPSS, whereas in this study, panel data analysis was used.

4. The Effect of Transfer Pricing on Tax Aggressiveness with Corporate Social Responsibility as a Moderating Variable

Based on the test results in table 4.12, the interaction of the transfer pricing (TP) and CSR variables on the dependent variable has a probability value of 0.2830 or greater than 0.05. The coefficient in the test results shows a positive direction with a value of 0.091949 and a t-statistic value of 1.078601. Thus, H4 is accepted, where Corporate Social Responsibility weakens the influence of transfer pricing on tax aggressiveness.
The results of this research support previous research conducted by Maharani and Merkusiwati (2021) which stated that Corporate Social Responsibility has a significant negative effect on tax aggressiveness. This means, the more CSR values are implemented in a company, the lower the level of tax aggressiveness of the company. According to legitimacy theory, it is natural for companies to maintain good relations with the environment and society around the company and reflect activities that are in accordance with legal provisions and social norms of society. Meanwhile, the behavior of avoiding tax obligations carried out by companies in any way is seen as a loss to society which is certainly unfair (Nugraha and Meiranto, 2015).
The results of this research are different from the research of Makhfudloh et. al., (2018) which states that there is no significant influence between the relationship between CSR and tax aggressiveness planning. This result is also not in line with research conducted by Apriyani and Muhyarsyah (2021) which states that CSR cannot moderate the relationship between transfer pricing and tax avoidance.
The differences in the results of this study could be caused by differences in analytical test methods, where in the research of Makhfudloh (2018) and Apriyani and Muharsyah (2021) used the multiple linear regression analysis method, while in this study the analysis test used the panel data regression method.

5. The Effect of Thin Capitalization on Tax Aggressiveness with Corporate Social Responsibility as a Moderating Variable

Based on the test results in table 4.12, the variable multiplying thin capitalization with CSR has a probability value of 0.4916 which is greater than 0.05. Apart from that, the results of this research show a positive direction with a coefficient value of 0.359732 and a t-statistic value of 0.689917. Thus, H5 is accepted, or it can be said that Corporate Social Responsibility weakens the influence of thin capitalization on Tax Aggressiveness.
The results of this research support previous research conducted by Rohyati and Suripto (2021) which stated that Corporate Social Responsibility has a significant positive effect on the Effective Tax Rate (ETR), which indicates a low level of tax aggressiveness. One of the values raised in the GRI-G4 indicator for CSR disclosure is the value of income distributed directly to the government and society, one form of which is tax payments.
So it can be said that companies are required to pay taxes in accordance with applicable regulations in order to maintain their good name by implementing CSR values to the maximum. The results of this research also support the legitimacy theory which states that companies should fulfill and disclose social environmental responsibilities in order to gain more trust from stakeholders.

The results of this research contradict research by Setyoningrum and Zulaikha (2019) which states that Corporate Social Responsibility does not have a significant influence on tax aggressiveness. The differences in the results of this research may be possible due to differences in research objects and test methods. In Setyoningrum and Zulaikha's (2019) research, the research objects used were manufacturing companies registered on the IDX in 2014-2017 and used the multiple regression analysis test method. Meanwhile, this research uses mining sector companies as research objects and uses panel data regression analysis as a test method.

6. The Effect of Gender Diversity on Tax Aggressiveness with Corporate Social Responsibility as a Moderating Variable

The test results in this study show that the interaction between CSR variables and gender diversity has a probability value of 0.0428. The test results also show a positive direction with a t-statistic value of 0.794659. Thus, H6 is rejected, because Corporate Social Responsibility does not strengthen the influence of gender diversity on tax aggressiveness.

The results of this research support research conducted by Gunawan et al., (2018) which states that CSR does not have a significant effect on the aggressiveness of tax planning. The results of this research are also in line with research by Bandiyono and Dewangga (2020) with similar results, namely that CSR is proven to have no significant effect on tax avoidance.

The results of this research are possible because the implementation and disclosure of CSR is carried out by companies only as a fulfillment of obligations without being followed by decision making regarding corporate taxation (Gunawan et al., 2018). These results do not prove the legitimacy theory which states that companies should gain public legitimacy through implementing CSR and not avoiding tax.

The results of this research are different from research conducted by Lanis and Richardson (2012) and Nugraha and Meiranto (2015) which stated that CSR had a negative effect on tax aggressiveness. The differences in results that occur can be caused by several things, one of which is the difference in research objects. In Lanis and Richardson's (2012) research, the research objects used were public companies in Australia. Research by Nugraha and Meiranto (2015) examined manufacturing sector companies listed on the IDX in 2012-2013. Meanwhile, in this research, the research objects used are manufacturing sector companies listed on the IDX in 2017-2021. Research objects that have different conditions may cause differences in results in the research carried out.

CONCLUSION

This research was conducted to determine the effect of transfer pricing, thin capitalization, and gender diversity on tax aggressiveness with Corporate Social Responsibility as a moderating variable in mining sector companies listed on the Indonesia Stock Exchange (BEI) during 2017-2021. Based on the results of statistical tests using the panel data regression analysis method using EViews version 12 software, the following conclusions can be drawn.

1. *Transfer Pricing*has no effect on tax aggressiveness. The results of this research are in line with previous research conducted by Falbo and Firmansyah (2018). However, this research contradicts research conducted by Wijaya and Rahayu (2021).
2. *Thin Capitalization*has no effect on tax aggressiveness. The results of this research are consistent with the research of Bandiyono and Murwaningsari (2019) and Nainggolan and Sari (2019). However, this research contradicts research by Andawiyah et al., (2019).
3. *Gender Diversity*significant negative effect on tax aggressiveness. The results of this research are in line with previous research conducted by Hudha and Utomo (2021). However, this research contradicts research conducted by Mala and Ardiyanto (2021).
4. *Corporate Social Responsibility*(CSR) weakens the influence of transfer pricing on tax aggressiveness. This research is in line with previous research conducted by Maharani and Merkusiwati (2021).
5. *Corporate Social Responsibility*(CSR) weakens the effect of thin capitalization on tax aggressiveness. The results of this research are consistent with previous research conducted by Setyoningrum and Zulaikha (2019).
6. *Corporate Social Responsibility*(CSR) is unable to moderate the influence of gender diversity on tax aggressiveness. This research is in line with the results of previous research conducted

by Gunawan et al. (2018).

The research that has been carried out so far has research limitations which can later be used as references in conducting further research, including the following:

1. The sample size is limited, only 25 companies out of 125 mining companies listed on the IDX. So it is not able to represent the overall picture of companies in Indonesia.
2. The research period is relatively short, only 5 years 2017-2021.
3. This research only uses 3 independent variables, namely transfer pricing, thin capitalization, and gender diversity

Research related to the influence of transfer pricing, thin capitalization, and gender diversity on tax aggressiveness with Corporate Social Responsibility which will be carried out in the future is expected to provide better results by paying attention to the following things, including: Future researchers can use other independent variables that can be influential, such as foreign ownership, political relations, or the use of tax havens, etc., further research can use other measurements or proxies to measure the tax aggressiveness variable, such as using the Effective Tax Rate (ETR).

7. Future research can use other moderating variables that can have an influence, such as institutional ownership. Future researchers can also use intervening variables to replace moderating variables.
8. It is hoped that future research can expand or select a more varied population and sample. Future research can select samples from all companies in Indonesia, or select samples from sectors different from the mining sector.
9. It is hoped that future research can determine more specific sample criteria, such as the minimum number of assets and level of profitability so that the samples obtained are equal. Future research can also use control variables, such as number of assets, profitability, and ownership.
10. Future research can select research samples with a research period of more than five years.

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