

TAXATION ASPECTS OF COMPANIES THAT UTILIZE MARKET PLACE IN BUSINESS ACTIVITIES: CASE STUDY OF CV X

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Abstract: This study aims to analyze the taxation aspects of CV X as a company that utilizes marketplace in business activities in Indonesia. CV X is a micro company engaged in the retail trade of clothing. The method used in this study is a case study with analysis of CV X's financial and tax data during 2024. The results of the study indicate that CV X has carried out its tax obligations according to the provisions, including payment of Final Income Tax Article 4(2) MSMEs, Final Income Tax Article 4(2) Rent, and Income Tax Article 21, but still faces challenges in recording complex transactions, as well as the time difference between receipt of goods and disbursement of funds, which has the potential to cause inaccuracies in revenue recognition and tax reporting. It can be concluded that CV X's tax compliance is quite good, but it needs to improve the bookkeeping system and tax socialization to overcome existing challenges.

Keywords: *Companies That Benefit Marketplace, Micro, Small and Medium Enterprises (MSMEs), MSME Taxation*

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1. Introduction

The rapid development of information technology and the internet over the past few decades has become one of the most significant driving forces behind the transformation of the global business landscape. The integration of digital systems into various aspects of economic activity has fundamentally changed how companies operate, interact with customers, and deliver value. One of the most notable manifestations of this digital transformation is the emergence and exponential growth of companies that utilize online markets, or what is commonly known as electronic commerce (e-commerce). Through e-commerce platforms, business actors can reach a broader market, reduce operational costs, and improve efficiency in conducting transactions, while consumers benefit from easier access to goods and services, competitive prices, and convenience in shopping anytime and anywhere.

E-commerce now plays a central and strategic role in facilitating digital sales transactions between sellers and buyers, acting as a bridge that connects supply and demand in the digital economy ecosystem. In Indonesia, this phenomenon has grown rapidly in recent years, driven by increased internet penetration, the widespread use of smartphones, and the growing public trust in online transactions. According to Pramudatama (2024), the value of online business transactions in Indonesia continues to experience significant growth, with the Gross Merchandise Value (GMV) projected to reach IDR 1,430 trillion by 2024—representing a 13% increase compared to the previous year. This figure reflects not only the magnitude of the

digital economy's potential but also the increasing shift of business activities from conventional to digital-based operations.

However, behind this rapid growth lies a series of complex challenges, particularly concerning the implementation and enforcement of tax regulations in the e-commerce sector. The digital nature of online business often makes it difficult to monitor transactions, identify taxable objects, and ensure that every business actor fulfills their tax obligations appropriately. Various obstacles remain, such as differences in interpretation of tax regulations between the government and business actors, as well as technical difficulties in calculating, collecting, and reporting taxes in accordance with applicable provisions. Furthermore, legal uncertainty frequently arises due to the dynamic nature of the digital economy, which demands continuous adjustments to the regulatory framework. Although the government has issued several regulations to address these issues such as the Minister of Finance Regulation (PMK) Number 210/PMK.010/2018, PMK 31/PMK.010/2019, and PMK 60/PMK.03/2022 (Online-pajak, 2023) in practice, the implementation of these policies still encounters various inconsistencies and interpretational challenges.

These regulatory and operational challenges have a direct impact on the level of business compliance and the accuracy of tax reporting among companies engaged in online commerce. Inadequate understanding of tax obligations, coupled with ambiguous legal frameworks, often leads to unintentional non-compliance or even deliberate avoidance. Therefore, conducting research on the application of tax regulations to companies utilizing online marketplaces in Indonesia becomes highly relevant and urgent. This study aims to analyze how such regulations are implemented in practice and to identify the main obstacles faced by businesses in fulfilling their tax obligations.

The focus of this research is on the year 2024, coinciding with the commencement of online operations and tax compliance processes by CV X, a representative case study of an online business entity operating within the Indonesian e-commerce ecosystem. Through an in-depth qualitative analysis, this research is expected to generate practical insights and policy recommendations that can help improve the effectiveness of tax regulation implementation in the digital economy. Moreover, the findings of this study are anticipated to provide theoretical contributions that enrich the existing body of literature related to taxation in online business activities, as well as to serve as a reference for both policymakers and practitioners in developing strategies that support sustainable tax compliance in the era of digital transformation.

2. Research Method

The research method employed in this study is a qualitative case study, focusing on CV X, a micro-enterprise engaged in the clothing retail sector that actively utilizes online marketplace platforms as its primary sales and marketing channel. CV X was selected as the object of study due to its representativeness of many small and medium enterprises (SMEs) in Indonesia that have transitioned from conventional, offline business models to fully digital operations. This transition reflects a broader phenomenon within the digital economy, where micro and small enterprises increasingly rely on e-commerce platforms to expand market reach, streamline operations, and improve sales performance. By focusing on a single case, the study seeks to provide an in-depth and comprehensive understanding of how tax obligations are implemented and managed in the context of online business operations at the micro-enterprise level.

The case study approach was chosen because it allows researchers to explore complex, real-world issues in detail, particularly those that cannot be adequately captured through

quantitative or large-scale survey methods. Through this approach, the research aims to generate rich, contextual insights regarding the application of taxation principles, administrative processes, and regulatory compliance within a digital business environment. The data analyzed in this study include financial statements, transaction records, and tax documentation for the fiscal year 2024, which marks the period when CV X officially transitioned to conducting its business activities entirely through online platforms. The selection of this period is considered crucial, as it represents the company's initial phase of adapting to digital operations and simultaneously fulfilling tax obligations under evolving e-commerce regulations. This approach enables the researcher to comprehensively identify how tax obligations are implemented, the procedures followed by the enterprise, and the unique characteristics of transactions conducted through e-commerce platforms.

The analytical framework of this research centers on examining the implementation of applicable tax obligations in accordance with the prevailing tax regulations for micro and small businesses in Indonesia. Specifically, the study analyzes the calculation, reporting, and payment processes related to several key taxes, including the Final Income Tax (PPh) Article 4 paragraph (2) for Micro, Small, and Medium Enterprises (MSMEs), Final Income Tax Article 4 paragraph (2) on rental income, and Income Tax (PPh) Article 21, which relates to employee wages or honoraria. In addition to evaluating the compliance aspects of these tax obligations, the study also investigates various operational and administrative challenges encountered by CV X. These include issues related to the complexity of recording online transactions, the time lag between the delivery of goods and the disbursement of funds, and the potential discrepancies in revenue recognition and tax reporting arising from asynchronous transaction timelines between marketplace systems and company accounting records.

Data collection is carried out through a combination of documentation analysis and examination of financial and transactional records obtained directly from the company. This method enables the researcher to gain a detailed and accurate picture of the company's level of tax compliance and to identify the specific problems encountered in fulfilling its fiscal responsibilities. Furthermore, the documentation process also involves reviewing digital transaction evidence, such as marketplace sales reports, electronic invoices, and proof of tax payments, to ensure data validity and consistency. The findings derived from this analytical process are expected to provide valuable insights not only for CV X in improving its tax management practices but also for policymakers and tax authorities in understanding the real challenges faced by online-based micro-enterprises. Ultimately, the study aspires to contribute to the broader discourse on tax compliance in the digital economy, particularly in relation to the readiness of regulatory frameworks and the need for adaptive mechanisms that can accommodate the dynamic nature of e-commerce transactions.

3. Results and Discussion

3.1. Results

Implementation of Tax Provisions and Tax Obligations at CV X as a Company Utilizing Online Markets

CV X, as a company utilizing online marketplaces, is subject to various tax obligations that must be met in accordance with applicable Indonesian tax regulations. As a micro-enterprise operating through online marketplaces, CV X has tax obligations such as:

1. Register yourself at the office of the Directorate General of Taxes (DGT) whose working area covers the taxpayer's place of residence or domicile and be given a Taxpayer Identification Number (NPWP).

CV X has fulfilled its tax obligations by registering itself at the DGT office whose working area covers CV X's residence or domicile in July 2023. Through this registration, CV X obtained a NPWP, which is the company's official identity as a corporate taxpayer in Indonesia.

2. Reporting taxpayer business to the Directorate General of Taxes office.

CV X has fulfilled its tax obligations by reporting its business to the Directorate General of Taxes (DGT) office in accordance with applicable regulations. This reporting process is an important administrative step so that CV X is officially registered as a corporate taxpayer and obtains the tax rights and obligations attached to that status. As proof of implementation of its tax obligations, CV X attached sales turnover data from one of the online marketplaces (Shopee) during 2024, which was recorded at IDR 2,506,394,065. According to Law Number 20 of 2008, this amount is still below the turnover limit of IDR 4.8 billion per year, which in the tax regulations, CV X is not required to be confirmed as a Taxable Entrepreneur (PKP) and is classified as a Micro, Small, and Medium Enterprise (MSME).

3. Organizing bookkeeping for taxpayers who carry out business activities.

CV X has maintained regular and systematic bookkeeping in accordance with tax regulations. This bookkeeping records all business transactions, including sales turnover, detailed in Table 3.1, rental expenses, and employee payroll. With proper bookkeeping, CV X can calculate and report taxes accurately and facilitate audits by tax authorities. This also supports the company's transparency and compliance with tax obligations as a business operating in the online marketplace.

In addition to its tax obligations, CV X, as a company utilizing online marketplaces, has also complied with government regulations to ensure compliance and optimize tax revenue. The following are the rules and implementation of tax calculations for CV X.

Final Income Tax Article 4 paragraph (2) for MSMEs

These findings suggest that while market entry barriers exist, Somiprek's proven innovation capabilities and community-based approach position it well for Surabaya's competitive landscape. The 122% revenue growth over two years demonstrates scalability potential when combined with localized market adaptation.

Table 1. CV X's Shopee Turnover List Table for 2024

MONTH	SHOPEE TURNOVER
JANUARY	353.905.825
FEBRUARY	198.118.786
MARCH	270.685.131
APRIL	221.771.756
MAY	274.502.202
JUNE	278.632.008
JULY	252.881.693
AUGUST	192.741.680
SEPTEMBER	149.460.419
OCTOBER	101.904.364
NOVEMBER	102.848.945
DECEMBER	108.941.256
TOTAL	2.506.394.065

Source: CV X (2024)

The Shopee CV X turnover listed in the table is the net turnover, namely the sales value that has been reduced by the total product discount, voucher discount borne by the seller, shipping costs passed on by Shopee to the shipping service, AMS Commission Fee, administration fees, and service fees (including 11% VAT). The turnover figures shown reflect the net income actually received by CV X from sales transactions through Shopee each month.

CV X is a company that receives or earns income with a gross turnover not exceeding IDR 4,800,000,000 in one tax year. The tax base used to calculate Final Income Tax Article 4(2) for MSMEs using a rate of 0.5% is the gross turnover of the business each month. The following is the calculation of Final Income Tax Article 4(2) for MSMEs for the period January to December 2024 for CV X:

Table 2. Final Income Tax Calculations Article 4(2) for MSME CV X in 2024

TIME	CALCULATION	Income Tax Payable
January	0,5 % x 353.905.825	1.769.529
February	0,5% x 198.118.786	990.594
March	0,5% x 270.685.131	1.353.426
April	0,5% x 221.771.756	1.108.859
May	0,5% x 274.502.202	1.372.511
June	0,5% x 278.632.008	1.393.160
July	0,5% x 252.881.693	1.264.408
August	0,5% x 192.741.680	963.708
September	0,5% x 149.460.419	747.302
October	0,5% x 101.904.364	509.522
November	0,5% x 102.848.945	514.245
December	0,5% x 108.941.256	544.706
TOTAL		12.531.970

Source: Processed data (2025)

Based on the calculation results presented in table 3.2, it shows that CV X records the amount of tax to be paid each month, so that the total tax payable by CV X during 2024 is IDR 12,531,970. This illustrates that CV X consistently fulfills its tax obligations by recording and reporting the taxes owed each month in accordance with applicable regulations.

Final Income Tax Article 4 paragraph (2) Rent

Income tax on land and/or building rental is regulated in Government Regulation Number 5 of 2002, Decree of the Minister of Finance No. 120/KMK.03/2002, Decree of the Director General of Taxes No. KEP-227/PJ/2002. In calculating Final Income Tax Article 4(2) Rental, CV X uses a land and/or building rental agreement as a reference document. The agreement states that CV X rents land and buildings measuring 300m² and is used from July 1, 2024 to June 30, 2025 with a rental price of IDR 10,000,000 for one year. The following is the calculation of Final Income Tax Article 4(2) Rental for 1 year at CV X:

Final Income Tax Article 4(2) = 10% x 10,000,000

$$= 1.000.000$$

Income Tax Article 21

In calculating Article 21 Income Tax for permanent employees of CV X, provisions are used through the Average Effective Rate (TER) type. The implementation of the Article 21

Income Tax effective rate (TER) scheme which came into effect in January 2024, the calculation of Article 21 Income Tax has become simpler. The TER scheme does not change the annual details of Article 21 Income Tax because it still refers to the provisions of Article 17 paragraph (1) letter a of the Income Tax Law. The TER scheme does not add new taxes, but functions as a tax calculation method.

Table 3. CV X Permanent Employee Salary List Table for September 2024

DETAILS	EMPLOYEE A	EMPLOYEE B	EMPLOYEE C
PTKP STATUS	K/0	TK/0	TK/0
TOP CATEGORY	A	A	A
TO HAVE	0,00%	0,00%	0,00%
SALARY	4.250.000	4.250.000	3.500.000
GROSS	4.250.000	4.250.000	3.500.000

Source: CV X (2024)

The calculation of Article 21 Income Tax for permanent employees of CV X using the TER application is as follows:

Table 4. Calculation List of Income Tax Article 21 for Permanent Employees of CV X for September 2024 Period

NUMBER	CALCULATION	Income Tax Payable
Employee A	0,00% x 4.250.000	0 (None)
Employee B	0,00% x 4.250.000	0 (None)
Employee C	0,00% x 3.500.000	0 (None)

Source: Processed data (2025)

Based on the calculation results presented in table 3.4, it can be explained that there are three permanent employees of CV X who are not subject to Article 21 Income Tax (nil) even though CV X's permanent employees have income because their TER is 0.00%. This is because CV X's permanent employees' income is below the taxable limit or meets the tax-free requirements.

The total gross income of CV X's three permanent employees in September 2024 was Rp12,000,000. This gross income indicates that the three permanent employees' income falls below the Non-Taxable Income (PTKP) limit, thus exempting them from Article 21 Income Tax withholding under applicable tax regulations.

Challenges faced by CV X in the Implementation of Tax Provisions and Obligations as a Company Utilizing Online Markets in Indonesia.

1. Complexity of Tax Rules and Differences in Interpretation

Indonesian tax regulations are known for their dynamic nature, with frequent regulatory changes and a high degree of technical complexity. This situation often causes business owners like CV X to experience difficulties in understanding and implementing applicable tax provisions. To ensure compliance and minimize potential misunderstandings with tax authorities, CV X collaborates with a tax consultant to assist them in every tax administration process. The assistance of a tax consultant helps the company adapt to evolving regulations.

2. Legal Uncertainty Due to the Revocation of PMK 210/2018

Revocation of the Minister of Finance Regulation (PMK) Number 210 of 2018 which previously regulated the taxation procedures for the financial sector-e-commerce. This creates legal uncertainty. This uncertainty is particularly evident in the distinction between conventional and digital merchants, which can lead to confusion in implementing tax obligations and increase the risk of reporting discrepancies. This situation underscores the importance of consistent and clear regulations to ensure businesses can fulfill their tax obligations and avoid potential violations.

3. Using more than seven payment methods (e-wallet, cash on delivery, inter-bank transfer, etc.) makes it difficult to record transaction data.

CV X faces challenges in recording business transactions due to the use of more than seven types of payment methods, such as e-wallet, bank transfer, and cash on delivery. Each payment method has a different recording mechanism, complicating data integration and reconciliation. Consequently, the risk of mismatches between financial and tax data increases, which can impact the accuracy of tax reporting. To address this, the development of an integrated recording and bookkeeping system is necessary so that all transactions can be documented accurately and auditably.

4. Income from sales through the Shopee platform that has been received by customers, but the funds are only disbursed a few days later, creates challenges in terms of income recognition and tax reporting.

Revenue from sales through the Shopee platform has been received by customers, but funds are only disbursed several days later, creating challenges in revenue recognition and tax reporting. In e-commerce practices like Shopee, the risks and rewards of ownership of goods generally transfer to the buyer when the order is received and confirmed. However, funds may only be disbursed to the seller several days later, in accordance with Shopee's policies.

In accounting and taxation, income is recognized when the transaction occurs, not when the goods are received by the buyer and there are no claims or returns. Even if funds are disbursed several days later, income should be recognized when the goods are received by the buyer, not when the funds are received by the seller. For example, if an order is received by a customer in December and the funds are disbursed in January, the income is still recognized as income for December. In the Annual Tax Return (SPT) report, this income is reported as income for the current year (December), not for the following year (January). Income from this transaction must be included in the SPT for the tax year in which the goods are received by the buyer, even if the funds are disbursed in January. This treatment is in accordance with the accrual principle applicable in taxation and accounting in Indonesia, where income is recognized when the right to income arises, not when cash is received.

3.2. Discussion

The analysis of findings reveals a notable dichotomy between CV X strategic tax compliance posture and the vulnerabilities within its operational accounting processes. On one hand, the study identifies commendable indicators of a proactive commitment to regulatory adherence. This commitment is primarily evidenced by the strategic decision to engage external tax consultants. This maneuver can be interpreted as a rational response by a Micro, Small, and Medium-sized Enterprise (MSME) to navigate the high regulatory burden and information asymmetry inherent in Indonesia's complex tax landscape, particularly for entities operating within the burgeoning digital marketplace. By outsourcing this specialized function, CV X demonstrates an acute awareness of its internal limitations and a clear intention to mitigate non-

compliance risk. This strategic commitment is further substantiated at the procedural level. The accurate technical implementation of calculations for specific tax articles—namely Final Income Tax Article 4(2) for MSMEs, Final Income Tax Article 4(2) on Rental income, and Income Tax Article 21 for employees indicates a robust application of prevailing government regulations and a high degree of technical competence in fulfilling discrete tax obligations.

Notwithstanding this commendable compliance orientation, the research concurrently identifies a significant internal control deficiency related to the firm's revenue cycle, which presents a substantial counter-risk. CV X faces formidable challenges in ensuring the integrity and accuracy of its revenue recognition process, specifically for transactions originating from the Shopee e-commerce platform. The root of this deficiency is twofold. First, it stems from a critical lack of system integration; the firm's current accounting system is ill-equipped to automatically capture, reconcile, and post transactions from the multitude of payment gateways endemic to modern e-commerce (e.g., various e-wallets, virtual account bank transfers, and cash-on-delivery (COD) methods). This technological gap creates disparate data streams that necessitate high-risk manual reconciliation.

This challenge is significantly exacerbated by the inherent temporal disconnect or time lag between the point of product delivery to the customer (the conceptual point of revenue recognition under accrual accounting) and the eventual settlement and disbursement of funds from the platform operator to CV X accounts. This process gap creates a critical risk of misapplying the accrual principle. The potential for improper timing of revenue recognition either recognizing revenue too early (upon order) or too late (upon cash receipt) could lead to a material misstatement of both gross revenue and, consequently, taxable income for a given period. This operational failure, therefore, directly undermines the firm's strategic compliance goals, creating a significant risk of inadvertent tax reporting errors despite its positive intentions.

4. Conclusion

Based on the results of the research that has been conducted, conclusions can be drawn and suggestions can be made that are related to the discussion that has been presented in the previous chapter, namely:

- a. CV X is a company that utilizes online markets in carrying out its business activities with a gross income of no more than IDR 4,800,000,000 in a year that has complied with the regulations for implementing tax provisions and obligations for companies that utilize online markets. The tax provisions and obligations that have been complied with by CV X are the calculation of Final Income Tax Article 4(2) for MSMEs, Final Income Tax Article 4(2) for Rental, and Income Tax Article 21, registering, reporting business activities, and collecting and depositing taxes, maintaining bookkeeping.
- b. Companies that utilize the online market in Indonesia, such as CV X, in implementing the provisions of Taxation is not free from various challenges, namely the complexity and changes in tax regulations, such as the revocation of PMK 210/2018 which created legal uncertainty between conventional and digital traders, difficulties and lack of adaptation in recording digital transactions and bookkeeping, and in terms of revenue recognition, where income from sales on the Shopee platform is recognized when the goods are received by the buyer, even though the funds are only disbursed several days later.

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