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FISCAL AND PSYCHOLOGICAL FACTORS OF TAX EVASION

ABSTRACT

The article is devoted to the study of behavioural factors that influence the decision-making of business entities and the population regarding tax evasion. The problem of tax evasion from the point of view of the influence of psychological characteristics of the individual and external economic factors on the deviant behaviour of taxpayers is considered. The influence of these factors on the volume of the shadow economy in the country is proven.

The research allowed us to outline the main models that explain the reasons and motivations of taxpayers when they decide to violate tax legislation. It is emphasized that tax offences as a component of the shadow economy are present in many countries of the world. It is noted that the volume of violations increases with the onset of destructive events in the economy, such as economic and social crises and war. It is stressed that a significant role in the presence of deviant behaviour of taxpayers is played by their financial and legislative ignorance. The main elements of taxes that pose the greatest risks of tax evasion are identified.

It has been found that the level of corruption in the country and the insufficient severity of possible punishment for tax crimes play a significant role in the decision of economic entities to evade taxation. An analysis of the corruption perception index in some countries has been made. It is proved that in less corrupt countries, tax collection is higher than in countries with high levels of corruption. It is emphasized that the lack of proper control by tax authorities leads to a larger scale of tax evasion, so it is necessary to conduct all legally established types of tax audits, despite the martial law in the country.

Keywords: behavioural factors, fiscal sociology, tax evasion, shadow economy, corruption perception index, tax control

JEL Classification: G410, H260

INTRODUCTION

Tax evasion is a phenomenon inherent in all countries with market economies, i.e. countries with private property institutions. This phenomenon has not only economic and legal but also social and psychological background. Many factors influence the volume of tax evasion: the level of economic development and household income, the conditions of the country's historical and economic development (capitalist or communist system in the past), the stratification of society by income, the level of tax culture and financial literacy of citizens. Not the least reason for the decision to evade taxation by business entities and the population is the awareness of the possibility of returning their money paid in taxes at the expense of public goods. Therefore, the study of the nature of moral and sociological factors of tax evasion is a necessary component for further minimization of this negative phenomenon.

LITERATURE REVIEW

Many works in foreign scientific thought investigate the motives of business entities and the population when making decisions on tax payments. For the most part, these works

are written within the framework of such a stream of scientific thought as fiscal sociology. The representatives of this scientific thought are such scientists as J. Buchanan, J. O'Connor, R. Musgrave, G. Tullock, J. Schumpeter, D. Jacobs, and others.

With the further development of economic relations, authors are increasingly interested in the behavioural aspects of taxation. In the XXI century, such works were written as «The Myth of Ownership: Taxes and Justice» (2004 p.) by Liam Murphy, Thomas Nagel; «The Economic Psychology of Tax Behaviour» (2007 p.) by Erich Kirchler; «Tax Compliance and Morale: A Theoretical and Empirical Analysis» (2007 p.) by Beno Torgler; «Slaying Leviathan: The Moral Case for Tax Reform» (2009 p.) by Leslie Carbone; «The ethics of tax avoidance» (2014) by Ronaldo de Melo Parreira Filho; «Tax morality: The morals and ethics of tax» (2018) by Samantha du Chenne.

The works of these scholars examine the moral, ethical, and sociological aspects of taxation. It is emphasized that people's willingness to pay taxes by tax legislation is conditioned by many factors, including psychological ones. The reasons why citizens are willing or unwilling to make contributions to the budget of their country are considered.

The principles of fiscal sociology are quite new for national scientific thought. Few works study the tax behaviour of business entities and the population and their motives for tax evasion. Currently, these issues are addressed by V. Andrushchenko, A. Krysovatiy, S. Mochernyi, I. Pigolenko, O. Sydorovych, O. Tymchenko, T. Tuchak, V. Fedosov, and others.

A work that deserves special attention is the monograph by V. Andrushchenko and T. Tuchak «Moral and Ethical Imperatives of Taxes and Taxation (Western Tradition)». This work reveals the essence of traditional Western ideas about taxation and explores the sources of their origin. A thorough analysis is made of the factors that influence the tax behaviour of entities and which have received little attention in the national financial literature, in particular: fairness in taxation, moral aspects of the Old and New Testament periods of tax history, fiscal sociology, the tax state, fiscal federalism.

The works of other authors also focus on the peculiarities of taxpayers' tax behaviour and the causes of tax evasion, but the current challenges require further research in this area. The psychological and social pressure exerted on taxpayers by the COVID-19 pandemic and military operations in our country has a significant negative impact on the behaviour of business entities and the population. Therefore, the study of such phenomena as tax evasion and the size of the shadow economy is of particular relevance today.

AIMS AND OBJECTIVES

The article aims to identify the main factors that influence the tax behaviour of business entities and the population during destructive events in society.

The objectives of the research are as follows:

- to study the factors that influence the decision of taxpayers to evade taxation;
- to examine the level of shadow economy and corruption in Ukraine;
- to identify measures that can minimize tax evasion.

METHODS

The theoretical basis of the research is scientific works in the fields of fiscal sociology, behavioural finance, and taxation. The research is based on the assumption that the moral and ethical component has a significant impact on the decision of economic entities to evade taxation.

The research methodology is based on the use of general scientific and special methods of cognition. The empirical method was used in the process of collecting information for analysis based on the results of sociological surveys. The analytical method was used in the process of mathematical and analytical processing of statistical indicators of the shadow economy. The methods of synthesis and comparison were used to compare data on the types of tax evasion in Ukraine and the United States. The methods of systematization and logic were used to summarise the results of the study and develop proposals for influencing the deviant behaviour of taxpayers.

RESULTS

The economic and social situation in Ukraine during the war makes it imperative to take into account the public's attitudes when developing, adopting, and implementing tax legislation and amending it in matters of taxation of income of legal entities and individuals. That is why the tasks traditionally faced by fiscal sociology, taking into account the basic narratives of behavioural finance theory and taxation practice, are currently quite relevant for our country.

The main factors that encourage taxpayers to evade taxation are as follows:

- deterioration of the financial position of business entities;
- the complexity of tax calculations;
- peculiarities of the tax policy implemented in the country (uneven tax burden);
- the imperfection of administrative taxation technologies;
- contradictions in tax legislation;
- low level of trust in the authorities that redistribute budget funds;
- lack of effective methods for detecting tax offences;
- corruption of the tax authorities;
- insufficient development of international cooperation in combating tax offences;
- negative perception of existing taxation rules by taxpayers, too high tax rates, which leads to a desire to conceal income;
- political and economic crises, including those related to economic cycles.

All of these factors may contribute to taxpayers' decisions to evade taxation. On the one hand, there is no denying the correlation between economic cycles, namely, during periods of economic crises, military operations, excessive tax burden on business, etc., and the scale of tax evasion. On the other hand, one cannot but agree with the opinion of such leading Ukrainian scholars as V. Andrushchenko and T. Tuchak "...evasion is a human choice and act. After all, even in the presence of material problems, not everyone is in a hurry to avoid tax liabilities, and others evade even in the absence of problems", which they expressed in their work "Moral and Ethical Imperatives of Taxes and Taxation" [1, p. 211]. In other words, when deciding whether or not to evade or avoid paying taxes, individuals often use not an economic understanding of the amount of income they will have after paying taxes, but a selfish desire to keep as much of their income as possible. This theory is supported by a large number of court cases initiated by tax authorities against famous and wealthy athletes, actors, and public figures for tax evasion. In the case of wealthy individuals, it is impossible to blame the difficult economic circumstances in which they find themselves and which encourage them to violate tax laws. It is mainly a matter of a lack of understanding of belonging to a social community with certain rules of economic behaviour, of the willingness and ability of such individuals to violate these rules, and of a selfish sense of ownership of the income earned through labour and an unwillingness to give away part of it.

On the other hand, we should note that tax evasion has been addressed through various models that attempt to explain its causes and taxpayers' motivations. These models attempt to group numerous reasons or interactions of factors that motivate tax evasion. The following models are distinguished in the national literature:

1. Moral - arising from the nature of tax laws and the tax system as a whole.
2. Political, when taxes are misused by the state as an instrument of social or economic policy.
3. Economic - imbalance of the banking system, payment crisis, inflationary processes, rising prices and reduced solvency of the population, significant budget deficit.
4. Legal - lies in the complexity of the tax system, which hinders the effectiveness of tax control, as a result of which the taxpayer can avoid paying taxes [4, p. 226].

Foreign literature identifies the following main reasons for tax evasion:

1. Economic models: the evader endeavours to maximize his earnings (expected revenues vs expected costs).
2. Empirical evidence models: based on surveys and interviews – sampling. In this respect, the Spicer y Lundstedt model (1980) indicated that evasion decreases when there is greater coercivity (level of sanctions), when the perception of detection is greater, when the age is greater there is less aversion to risk, etc.

3. Simulations and experimental methods: individuals are subjected to hypothetical decisions of evasion and their behaviour is analyzed when certain conditions of their environment are modified.
4. Psycho-economic models of tax fraud: the decision to evade is a complex issue (inclination to defraud, ability to defraud and opportunity to defraud). When examining fraud, in addition to the economic interests one must analyze the taxpayer's psychological factors and his social environment [2].

All four models can be applied to the behaviour of individuals. At the same time, legal entities are often guided by a balanced understanding of risk/reward when deciding on tax evasion, i.e. their decisions are strongly influenced by economic crises, excessive tax burden, and other objective external factors. This is mostly evidenced by the statistics of tax evasion. This means that legal entities are more objective in their assessment of the possibility and necessity of committing tax crimes. In a simplified way, it can be shown as follows: when one company conceals income, it is a crime, and when a large number of companies conceal income simultaneously, it is a disagreement of business with the tax regime [9, p. 161].

Tax evasion always expands the volume of the shadow economy, as evasion is an integral part of it. We cannot but agree with the opinion of S. Mochernyi, who defines the category of the shadow economy as a sphere of economic activity aimed at generating income from prohibited activities or at evading state control and taxation in the course of legal economic activities [8, p. 637].

The share of the shadow economy in the formation of theoretical GDP (potential GDP if the economy is brought out of the shadows) is shown in Figure 1.

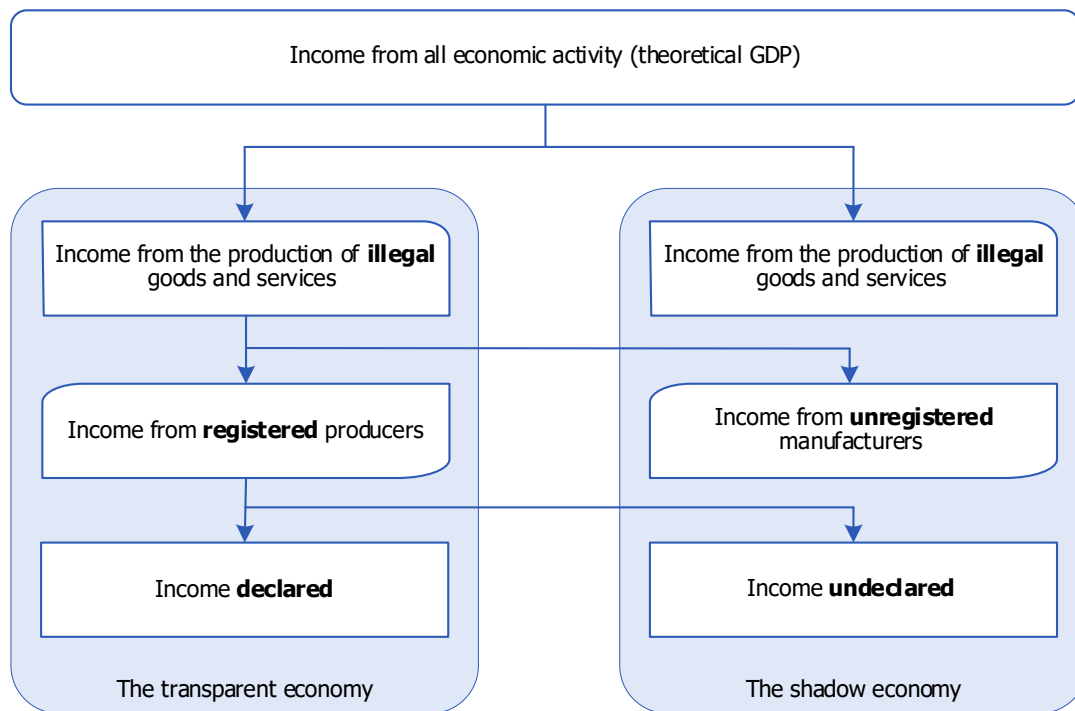


Figure 1. The shadow economy as a share of theoretical GDP. (Source: compiled according to [5])

Thus, the shadow economy plays a role in the formation of theoretical GDP and includes tax evasion (undeclared income). Before the full-scale invasion of our country by the Russian Federation, Ukraine, like other countries, measured the size of the shadow economy regularly. This measurement was carried out by the Ministry of Economy of Ukraine. According to the Ministry of Economy, in 2021, the level of the shadow economy was 32% (Figure 2).

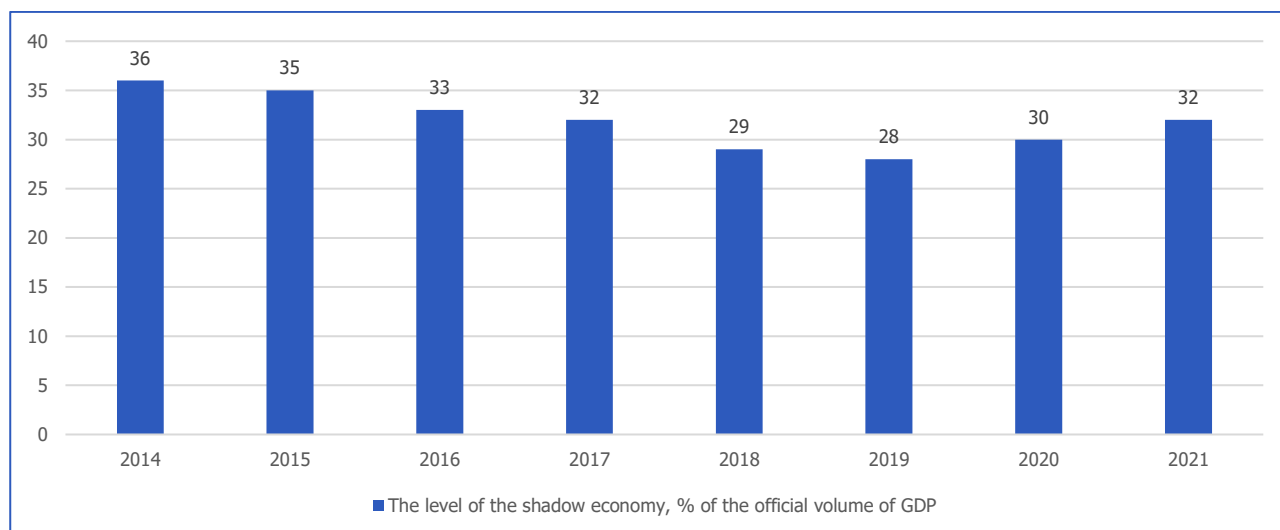


Figure 2. Dynamics of the shadow economy in Ukraine in 2014-2021. (Source: compiled according to [7, p. 2])

As can be seen from Figure 1, the size of the shadow economy gradually declined from 2014 to 2019. The growth of the shadow economy in 2020 and 2021 was driven by the COVID-19 pandemic and its aftermath. This was facilitated by rising global prices for raw materials (energy and agricultural products), which led to businesses trying to mitigate the risks of losing limited resources in the face of rising production costs. The forced quarantine restrictions hampered the development of most economic activities, while the moratorium on documentary inspections provided opportunities for increased evasion. In other words, the increase in the shadow economy in these years is mainly due to economic reasons and the lack of necessary control.

In 2022, the shadow economy was not measured due to military operations on the territory of our country and the great uncertainty of the impact of many new factors on taxpayers' tax behaviour.

A significant number of decisions made by taxpayers were made impulsively, in a state of stress, depression, and panic disorders, under the influence of cognitive biases, illusions, and emotions [12].

The full-scale invasion of the Russian Federation into the territory of independent Ukraine, bombing of civilian and critical infrastructure, missile attacks on settlements, active hostilities, and temporary occupation of part of the country's territory caused panic in society, associated with increased security risks and a direct threat to the life and health of the population, which resulted in mass internal and external migration, complete curtailment or reduction of business, and cessation of agricultural producers' activities. Given these objective circumstances, it is difficult to determine the actual amount of tax evasion.

According to a report of the Ministry of Finance of Ukraine on the execution of the state budget for 2022, the following main factors have been identified as influencing the level of budget revenues against the backdrop of a large-scale invasion of our country by Russian troops:

- a significant drop in the economy and business activity of taxpayers;
- large-scale migration of the population, both internal and external;
- creation of a new, special third group of single taxpayers.

The taxpayers of this group are individual entrepreneurs and legal entities with a maximum annual income of UAH 10 billion (instead of the usual 1167 minimum wages (or UAH 7.6 million as of the beginning of 2022)), except for business entities engaged in activities prohibited for this group. The interest rate is 2% of income (instead of the usual 3% with VAT and 5% without VAT) [10]. Since April, companies with more than UAH 10 billion in annual income have also been allowed to switch to this system, except for those operating in the fields of gambling, currency exchange, production and trade of excisable goods, mining, production and sale of precious metals and stones, business management, postal and communication services. In mid-April 2022, the Verkhovna Rada of Ukraine allowed the transition to a 2 per cent simplified taxation system for persons organizing gambling, producing and selling jewellery, and engaging in financial activities [12].

Given the latter factor, the subjective need to conceal one's real income from the entrepreneurial activity was almost levelled, as the Government provided a unique opportunity to legally earn high incomes at a fairly low level of taxation.

The volume of the shadow economy, which arises from the conscious decision of citizens to conceal their income, is measured using the household expenditure - retail trade and services research method. This research method is the result of the work of domestic scientists, which was developed taking into account the peculiarities of the shadow economy in Ukraine. The calculation of the level of the shadow economy by the household expenditures - retail turnover and services method are to identify the excess of consumer monetary expenditures of the population for the purchase of goods and services over the total volume of sales of goods and services to the population by all business entities in the legal sector of the economy.

This method is direct and is used to calculate macroeconomic parameters of the shadow economy [7]. According to a study by the Ministry of Economy of Ukraine, the concealment of population income in recent years has been at the following level (Figure 3):

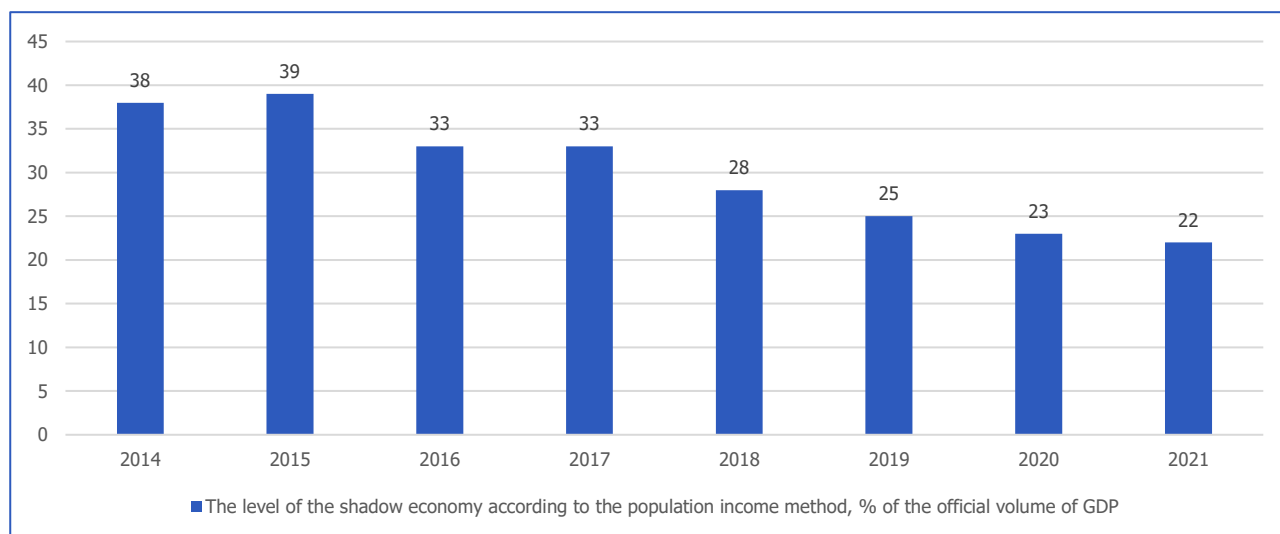


Figure 3. Dynamics of the level of the shadow economy in Ukraine according to the household expenditures - retail turnover and services method in 2014-2021. (Source: compiled according to [7, p. 8])

The level of the shadow economy according to the household expenditures - retail turnover and services method tends to decrease in 2016-2021. This trend was shaped by a decrease in non-priority household expenditures amid uncertainty over the COVID-19 pandemic; a reduction in the number of opportunities to purchase goods in unorganized markets; and a boost in consumer demand due to an increase in social standards (legal income).

The specifics of keeping records of business transactions and the possibility of formalizing or not formalizing labour relations determine the extent of tax evasion in a particular type of economic activity. In this case, it is inappropriate to refer to the difficult economic situation in the country, as the main reasons for evasion are the possibilities of using the specifics of business activities to violate tax discipline.

The standard and most common ways of tax evasion are:

- reduction (concealment) of income;
- lack of official registration of labour relations with employees;
- concealment of real income of employees (salaries «in envelopes»).

Unregistered labour relations, as well as salaries «in envelopes», minimize only one mandatory payment for employers - the unified social contribution from the payroll. In other words, from a financial point of view, the risk/reward ratio for a business entity is more likely to be weighted towards risk than towards profit, but the interests of employees also come into play here, as they are also interested in receiving more benefits at present than higher incomes (pensions) in the future due to their lack of awareness and distrust of the state.

The financial ignorance of both ordinary citizens and business entities is clearly demonstrated in the following Figure 4:

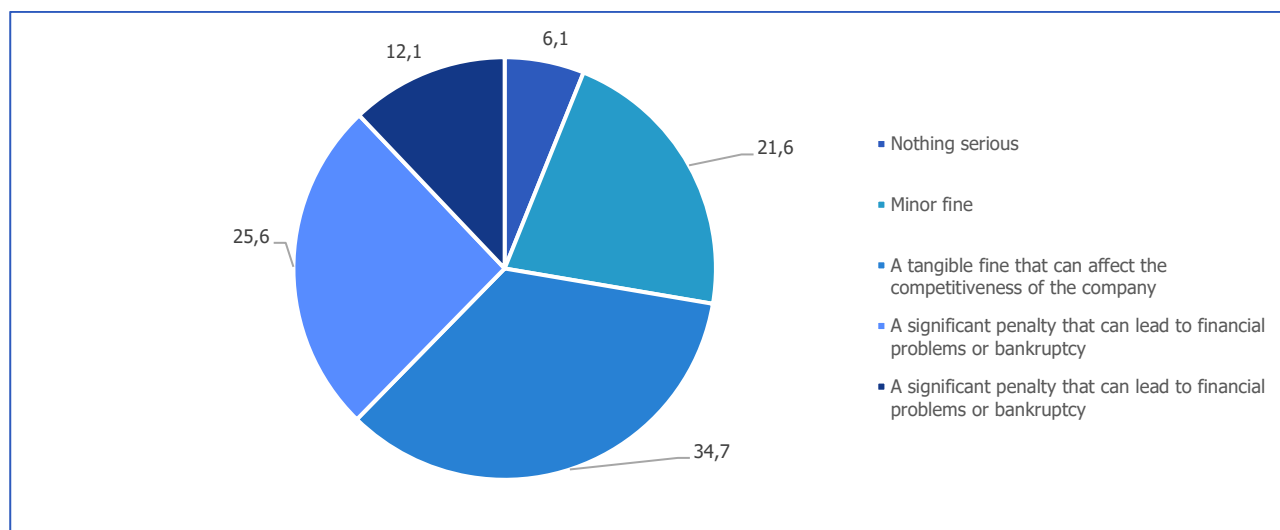


Figure 4. Share of expected penalties for deliberate underreporting or concealment of income, %. (Source: compiled according to [5])

The figure shows that 6.1% of respondents believe that the liability for violating tax laws is insignificant, although Ukrainian law provides for a fine of 25% of the amount of understatement for deliberate underreporting of income, and 50% of the amount of understatement for repeated underreporting within 1095 days. Such a penalty is hardly insignificant. At the same time, 12.1% of the surveyed businesses believe that after-tax fraud is detected, the company will have to cease its operations. Such a measure of liability is applied only to excise taxpayers for failure to equip excise warehouses with flow meters or equalization meters and for failure to address the comments of the tax authorities.

Only a third of the respondents are aware of the domestic tax legislation and the types of liability for tax evasion and see the real picture of the financial consequences of their actions. Nevertheless, the scale of income concealment and incomplete declaration is quite large.

Given that the shadow economy is present in all countries, leading sociological institutes around the world are engaged in its research and measurement. According to the US Internal Revenue Service, the United States loses about USD 496 billion annually due to tax evasion by individuals, with the majority of this loss coming from the failure to file tax returns and underreporting of real income. The US loses about USD 496 billion annually due to tax evasion by individuals, with the majority of this amount coming from failure to file tax returns, underreporting of real income, and underpayment of personal income tax [11]. In other words, it can be said that the types of tax evasion in a country that is prosperous in terms of economy and stability are not very different from those in Ukraine. For the most part, such decisions are made by individuals based on their moral and ethical preferences.

The structure of tax evasion in the United States on an economy-wide scale, which covers all types of economic activity, looks like this by tax (Figure 5):

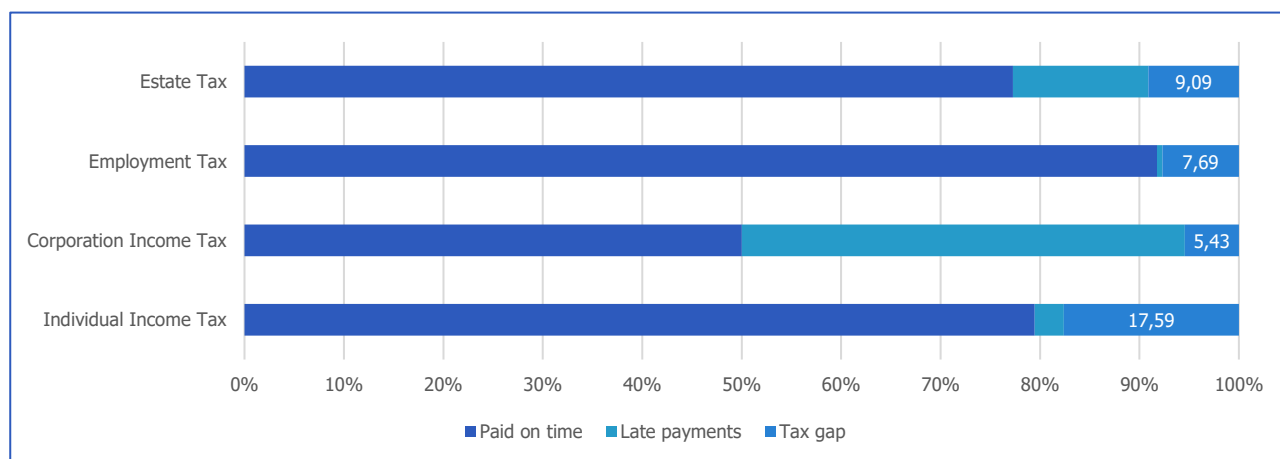


Figure 5. Structure of tax evasion by type of tax, %. (Source: compiled according to [3])

The US Internal Revenue Service defines the tax gap as the difference between actual tax liabilities and the amount actually paid. It includes three main components: a) failure to submit declarations; b) understatement of income in reporting; and c) underpayment of taxes.

As can be seen from Figure 5, most tax evasion occurs in the case of individual income tax. Corporate tax evasion, i.e. the tax paid by corporations, is much less common. Such trends are explained by the peculiarities of criminal law in the United States, where tax evasion by legal entities is considered a serious crime and carries severe penalties. In 2021, 63.3% of people involved in tax fraud cases were sentenced to prison. The average sentence for those who committed tax fraud was 14 months [3]. Thus, such factors as the inevitability and severity of punishment play a significant role in the decision of economic entities to violate tax legislation.

It should be noted that the degree and volume of tax evasion also depend on the type of tax, the way it is calculated, the structure of tax rates, and the characteristics of the taxable object. The following types of dependence can be distinguished:

1. When deciding to evade taxation, a significant role is played by the overlap between the roles of the taxpayer and the tax agent (the one responsible for transferring tax to the budget). In this case, it is easier to pay with other people's money than with your own.
2. The structure of tax rates also plays a significant role. Tax evasion mainly occurs in taxes whose rates are set in percentage terms rather than in monetary terms. The scale of evasion is particularly affected by the existence of several rates that vary in size depending on the size of the taxable object. In such cases, taxpayers may deliberately understate the size of the real object of taxation to use a lower rate.
3. The possibility of evasion is much greater when determining the object of taxation in terms of value than when determining the object in terms of quantity.
4. The existence of a mechanism for budgetary reimbursement of any taxes leads to the desire of taxpayers to use this mechanism to minimise their tax liabilities.

Other prerequisites that affect the scale of tax evasion include the following:

- efficiency of control actions of the tax authorities. The effectiveness of tax control is primarily related to the availability of effective audit methods by the controlling authorities. In the absence of such methods or relevant professional skills of tax inspectors, the likelihood of tax evasion increases;
- the system of penalties in the country. The greater the penalties for tax offences, the less risk taxpayers have of committing such violations;
- simplicity and clarity of tax legislation. Complex tax administrative technologies facilitate tax evasion because they create uncertainty about the scope of tax legislation, increase the costs of verifying compliance, and multiply the number of tax evasion formulas or mechanisms;
- moral acceptance of the existing tax system by taxpayers. If a taxpayer believes that the tax system is unfair, he or she will be less willing to comply with it. Acceptance of the system depends, among other things, on the moderation of the tax burden, fairness of taxation of income and economic activities, and the absence of lobbying of government interests.

Citizens' social perception of the state is fundamental to understanding the causes and importance of tax evasion. Situations of impunity and corruption generate even more evasion and discourage taxpayers who want to pay taxes according to the law. Corruption is also one of the most important reasons for tax evasion.

Corruption as a phenomenon exists in most countries of the world. The abuse of power by governments for their benefit reduces people's trust in public institutions, undermines the effectiveness and fairness of public policy, and misappropriates taxpayer money intended for social benefits.

The analysis of the budget revenues of more than 180 countries has shown that the most corrupt countries collect less taxes because citizens pay bribes to avoid them [2]. The absence of an equivalent exchange between the state and the taxpayer, when the taxpayer pays taxes and receives social and economic stability, leads to reluctance to pay these taxes. The taxpayer decides that it is more profitable for him to pay less money in the form of a bribe to a tax inspector than to pay the full amount of his obligations to the budget.

According to the research, it can be concluded that globally, less corrupt governments collect 4% more GDP in the form of tax revenues than countries with the same level of development and higher levels of corruption [2]. The most common

global rating of corruption in the world is the Corruption Perceptions Index (CPI). It measures how corrupt each country's public sector is perceived to be, according to experts and businesspeople. Each country's score is a combination of at least 3 data sources drawn from 13 different corruption surveys and assessments. These data sources are collected by a variety of reputable institutions, including the World Bank and the World Economic Forum [13].

The higher the index, the less corrupt the country is. The index is measured on a scale from 1 to 100. Let's look at the ranking of some countries according to the Corruption Perceptions Index. Table 1 shows 6 countries with the lowest level of corruption, Ukraine and its neighbors.

Table 1. Corruption Perceptions Index in 2022. (Source: compiled according to [4])

Country	Score	Rank
Denmark	90	1
Finland	87	2
New Zealand	87	2
Norway	84	4
Singapore	83	5
Sweden	83	5
Poland	55	45
Slovakia	53	49
Hungary	42	77
Moldova	39	91
Belarus	39	91
Ukraine	33	116
russia	28	137

Table 1 shows that Ukraine ranks 116th out of 180 countries in the Corruption Perceptions Index in 2022, which means it remains a rather corrupt country and is ahead of only russia in terms of corruption among its neighbors. However, it should be noted that this indicator is changing in a positive direction over time - in 2021, Ukraine was ranked 122nd. Despite the low score, war-torn Ukraine is one of the few countries that has significantly improved its results, gaining 8 points since 2013 [14]. Our country has long been struggling with systemic abuse of power, and, according to Transparency International, has already taken important steps to improve control and accountability. Given the above, if the fight against corruption continues to be successful, a positive result in reducing tax evasion should be expected.

For Ukraine, the fight against corruption is a challenge that requires perseverance in many areas but undoubtedly pays significant dividends that logically go beyond the tax area. The key aspect here is political will, and the continued strengthening of state institutions to ensure integrity, greater transparency, accountability, and international cooperation. One of the main levers to stimulate the willingness of businesses and individuals to pay taxes is to restore trust in institutions, negative perceptions of corruption, and satisfaction with public services.

DISCUSSION

Building trust between taxpayers and tax authorities is one of the key areas of combating tax evasion, and to this end, our country has decided to minimize control actions by the tax authorities, which, in our opinion, has a downside. As the research in this paper has shown, the percentage of tax evasion in the United States of America is much lower than in Ukraine. This is due to harsher penalties for tax crimes and the inevitability of tax audits in case of suspected violations of the law. The absence of audits and moratoriums on their implementation, which was established in Ukraine in 2020-2023, led to the concealment of the real income of economic entities and encouraged taxpayers to engage in deviant behaviour. The absence of severe penalties with only fines may also negatively affect a taxpayer's decision to violate the law. The minimum administrative penalty, which still applies as a fine the amount of the tax-free minimum income (UAH 17) in

multiple amounts, almost removes the responsibility for violating tax laws from the officials of enterprises and institutions, which also contributes to the growth of evasion. Therefore, in our opinion, an essential component of tax administration should be the full restoration of control and verification measures in the territory controlled by Ukraine and an increase in liability for violations of tax legislation. The establishment of trust between business entities, the population, and the tax authorities should be achieved by ensuring transparency of the State Tax Service of Ukraine, taxpayers' access to relevant information, and an effective fight against corruption.

CONCLUSIONS

Summing up the research, it should be noted that the presence of the shadow sector and its growth is a negative factor in the development of the domestic economy. Many factors contribute to this situation: the existence of loopholes in tax legislation that allow tax minimization by splitting one large business into several small ones; the lack of public trust in state institutions, namely the legislative and executive branches, which was particularly acute during the war; the lack of financial knowledge among the population and a low level of tax culture that has historically been formed in the post-Soviet space; a significant amount of corruption and the lack of real fight against its manifestations; the reduction of the number of unregulated businesses; and the lack of a clear and effective system of taxation. In our opinion, the first step in overcoming these negative factors should be a political decision to promote greater transparency of social processes and tax administration measures, increase the level of tax literacy of the population, ensure transparency and fairness of justice, fully restore the control functions of tax authorities and establish stricter penalties for violations of tax legislation in particularly large amounts, based on the current practice of developed countries.

ADDITIONAL INFORMATION

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ФІСКАЛЬНО-ПСИХОЛОГІЧНІ ЧИННИКИ УХИЛЯННЯ ВІД ОПОДАТКУВАННЯ

Стаття присвячена дослідженню поведінкових чинників, які впливають на ухвалення рішень суб'єктів господарювання та населення щодо ухиляння від оподаткування. Розглянуто проблематику ухиляння від оподаткування з точки зору впливу на девіантну поведінку платників податків психологічних особливостей особистості та зовнішніх економічних факторів. Доведено вплив цих факторів на обсяги тіньової економіки в державі.

Дослідження дозволило окреслити основні моделі, що пояснюють причини та мотивацію платників податків при ухваленні ними рішення про порушення податкового законодавства. Підкреслено, що податкові правопорушення як складова тіньової економіки існують у багатьох країнах світу. Відзначено, що обсяги порушень зростають при настанні деструктивних подій в економіці, таких як економічні й соціальні кризи та війна. Підкреслено, що вагому роль у наявності девіантної поведінки платників податків відіграє їхня фінансова й законодавча необізнаність. У статті визначено основні елементи податків, щодо яких існують найбільші ризики ухилянь від оподаткування.

Установлено, що вагому роль в ухваленні економічними суб'єктами рішення про ухиляння від оподаткування відіграють рівень корупції в країні та недостатня жорсткість можливого покарання за податкові злочини. Проведено аналіз індексу сприйняття корупції в деяких країнах. Доведено, що в менш корумпованих країнах обсяги збирання податків вищі, ніж у країнах із високим рівнем корупції. Наголошено, що відсутність належного контролю з боку податкових органів призводить до більших масштабів ухилянь від оподаткування, тому необхідним є проведення всіх законодавчо встановлених видів податкових перевірок, незважаючи на воєнний стан у країні.

Ключові слова: поведінкові чинники, ухиляння від оподаткування, тіньова економіка, індекс сприйняття корупції, податковий контроль

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