

Tax policy in the context strengthening the national security of Ukraine

Kateryna Klymenko¹, Nataliia Ukhna², Nataliia Semenyshe³

¹ *PhD in Economics*

SESE the «Academy of Financial Management», Ukraine

² *PhD in Economics*

SESE the «Academy of Financial Management», Ukraine

³ *Dr.Sc. in Economics, Professor*

Podillia State University, Ukraine

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Abstract

In the article, the authors substantiated the need to reform and improve the efficiency of tax policy to ensure national financial and economic security. It has been determined that the main problems of tax policy, taking into account the introduction of martial law, hinder the development of entrepreneurial activity, lead to a decrease in production, a decrease in investment in the national economy, a reduction in incomes of the population, an increase in defense spending and state debt due to dependence on foreign aid and loans, which in general, it can lead to a decrease in the country's defense capability and security, in particular, its financial sovereignty. The importance of adopting the law of Ukraine «On Amendments to the Tax Code of Ukraine and other legislative acts of Ukraine on the implementation of the international standard for automatic exchange of information on financial accounts», part of the implementation of the BEPS plan (measures to counteract the erosion of the taxable base and the removal of profits from taxation), developed by organization of the OECD and aimed at ensuring that the competent authorities have access to this information in order to effectively identify undeclared income of tax residents outside the countries and control the correctness of declaring income and paying taxes, which in turn will contribute to the proper fulfillment by our state of international obligations on the exchange of information. for tax purposes provided for by the current double taxation conventions, the Convention on Mutual Administrative Assistance in Tax Matters, the CRS Multilateral Agreement and the implementation of the best international policies and practices in this area. The authors of the article also consider the importance of international cooperation to improve the efficiency of tax policy, in particular, in the area of concluding tax agreements and openness of tax

Corresponding author:

¹ E-mail: klymenko_kateryna@ukr.net

ORCID: <https://orcid.org/0000-0001-8295-1333>

² E-mail: ukhna1nm@gmail.com

ORCID: <https://orcid.org/0000-0002-8562-9355>

³ E-mail: natviksem@gmail.com

ORCID: <https://orcid.org/0000-0002-0718-0230>

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registries. Gaining access to tax registries contributes to the fight against the shadow economy and crime, as it will allow you to control financial transactions and identify undeclared income. In particular, the conclusion of tax agreements between countries can reduce double taxation and stimulate the investment climate.

It is revealed that undeclared economic activity, which is one of the forms of the shadow economy, and the lack of effective control over compliance with tax laws, leads to an increase in tax losses, which in turn affects the financial stability of the state. The importance of developing and implementing an effective tax administration system in the context of the National Revenue Strategy (which is one of the «structural beacons» declared in the Memorandum on Economic and Financial Policy with the IMF, which will avoid tax evasion, reduce the risks of financial instability and ensure stable growth in revenues) is noted. It is noted that the successful implementation of the tax policy reform requires responsibility on the part of state bodies, society and business for the process of forming a tax culture, which will help raise the level of consciousness of citizens about the need to pay taxes and their importance for the development of the state.

Keywords: tax policy; tax system; tax reform; CRS standard; budget revenues; state budget; social and economic development of the state; digitalization; martial law; national security.

1. Introduction

The tax policy of developing countries is undergoing a stage of intensive transformation and modernization in accordance with the requirements of globalization and integration into the world economy. This involves the improvement of the tax system, the simplification of tax procedures and the introduction of digitalization measures, which contributes to the mobilization of national revenues and the improvement of the business climate, in particular, the introduction of Smart FLP, e-audit (SAF-T) and e-excise, automation of work with Big Data for analysis of transfer pricing risks, implementation of CRS and automatic exchange of interstate reports (CbC), etc. In addition, supranational regulators are increasingly focusing on countering the spread of corruption and tax evasion, in particular by reducing opportunities for the shadow economy and ensuring more transparent and open tax systems.

Tax policy is the main tool for establishing and maintaining socio-economic development and seeks to find a balance between the capabilities of the state in terms of providing it with financial resources (cash / tax revenues) through the tax mechanism and achieving priority goals under certain conditions for the development of the state. However, undeclared economic activity leads to a decrease in economic indicators, such as GDP, which can affect the country's investment climate and its rating among international partners and, as a result, cannot be used to develop infrastructure, education, healthcare and other areas. the life of the population. In addition, the underground economy is often associated with crime, money laundering and tax violations, which pose significant threats to national security. Therefore, we will conduct our study of tax policy in different planes in order to cover the widest possible range of actions and measures of the state in order to develop the national economy, taking into account the influence of global trends and the internal situation embodied through the mechanism of taxation.

The National Economic Strategy determines that an effective digital service state and compact state institutions should contribute to economic growth by improving the business climate, attracting foreign investment, reducing bureaucratic pressure on business and increasing the efficiency of public and corporate governance (National economic strategy for the period up to 2030, 2021). An important component of this process is the development of digital technologies and providing access to them for both the population and business entities, which, in turn, will help maintain the competitiveness of the economy in the global markets for goods and services, research and development, investment and innovation.

In addition, the National Security Strategy of Ukraine outlines nationwide tasks and priorities, including: strengthening the defense capability and ensuring military security; cybersecurity; combating terrorism and organized crime; ensuring energy and environmental safety; strengthening international cooperation and integration with the European Union and NATO (National Security Strategy of Ukraine, 2020). The objective of the strategy is to ensure the protection of national sovereignty, territorial integrity and the constitutional order, the security of citizens, economic growth and strengthening of public administration, as well as identifying promising areas for the development of the country, including ensuring information and economic security, raising civil activity and establishing a national historical narrative.

The purpose of the study was to substantiate the key directions for the development of tax policy in the context of strengthening national financial and economic security.

2. Literature review

The theoretical and methodological foundations of the tax policy of the state in the plane of symbiosis of its key determinants were studied in their works by domestic scientists: Bishops, Bakhmach, Betz, Galaburda, Gretska, Gretska, Desyatnyuk, Dmitrenko, Drach, Efimenko, Kucheryava, Marchenko, Oliy Shvager, Shevchenko [3–20].

Academician of the National Academy of Sciences of Ukraine Efimenko emphasizes in scientific research that the anti-crisis tax policy should be aimed at increasing budget revenues by improving the efficiency of compliance, risk management, and administration. This will allow the government to improve the provision of public services guaranteed by the Constitution of Ukraine in the field of education, health care, infrastructure, security and the improvement of the general standard of living [21].

The main focus of scientific research by Nechiporenko, Panchenko and Moroz is tax policy as a system of measures in the field of taxation, which is used by state authorities to establish taxation aimed at ensuring the receipt of taxes and fees in the centralized funds of the state's monetary resources, as well as achieving economic growth [22].

According to the specialists of the Ministry of Finance of Ukraine, the state tax policy is an activity carried out by the state in order to establish, legally regulate and organize the payment of taxes and tax payments to the centralized funds of the state's monetary resources. According to paragraph 3 of the Regulations on the Ministry of Finance of Ukraine, the Ministry ensures, among other things, the formation and implementation of a unified state tax policy, administration of a single contribution for obligatory state social insurance, counteraction to offenses in the application of tax laws, as well as compliance by payers with legislation on the payment of a single contribution [23].

The main priorities of the Ministry of Finance of Ukraine in ensuring the formation and implementation of the state tax policy are (in accordance with the Strategy for Reforming the Public Finance Management System for 2022–2025) [24]:

- improvement of tax legislation and its harmonization with EU rules, completion of the reform of the tax service;
- implementation of measures to complete the reform of the State Tax Service (STS) and fully transform it into a service organization by stimulating the voluntary fulfillment of tax obligations, taking into account the specifics of different groups and categories of taxpayers. This includes further simplification and digital transformation of tax administration processes, as well as focusing on the creation of an effective integrated risk management system in the STS to ensure a risk-based approach to taxpayers;
 - to improve the ability of the State Tax Service to identify and prevent external and internal threats of interference in the operation of databases and information resources used for tax administration. To do this, a hardware and software complex can be installed that allows the ministry and tax authorities to monitor these databases and information resources;
 - to improve the efficiency of tax audits, the introduction of electronic audit at the initial stage for large taxpayers, and then its expansion to all other taxpayers. In order to ensure a unified approach to the application of tax legislation, the ministry must ensure the proper quality of individual tax advice and the publication of generalized tax advice. The introduction of effective communication and the intensification of efforts to improve tax literacy will also have a positive impact on taxpayers;
 - to expand the tax base and protect bona fide taxpayers from unfair competition, taking measures to combat aggressive tax planning, which can be achieved by improving the exchange of tax information between the competent authorities of Ukraine and foreign states. An additional important step is the implementation of the BEPS Action Plan (countering profit shifting and profit shifting) to prevent loss of profits from the country;
 - implementation of measures in the conceptual areas of reforming the system of bodies implementing state tax policy, in accordance with the action plan approved by the Order of the Cabinet of Ministers of Ukraine dated 05.07.2019 No. 542 bases.

So, many domestic scientists and practitioners have studied the problematic aspects of tax policy, highlighting the versatility of its development directions, however, the problem of studying the key areas of development of the tax policy of Ukraine in the context of strengthening national financial and economic security, taking into account military operations in Ukraine, the priority vector of European integration and the acquisition of our EU candidate states.

3. Methodology and methods

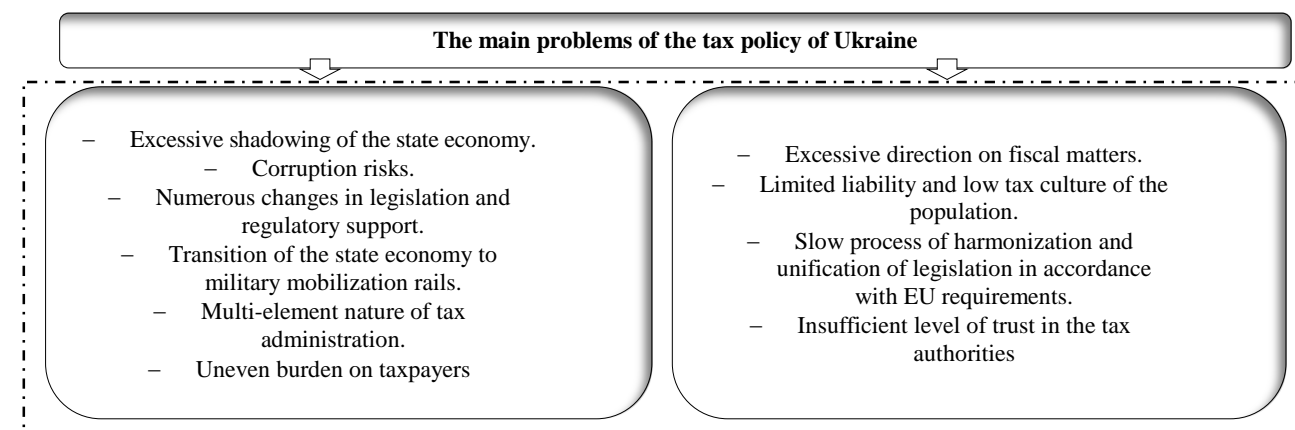
The study used general scientific and special methods: analysis, synthesis, grouping, description, comparison, theoretical generalization and abstract-logical.

4. Results

Tax policy provides, first of all, ensuring the formation of financial resources necessary for the state to perform its functions: the country's defense, law enforcement and national security, the country's governance system, the economy, and social security. Tax policy can be described as the activity of the state aimed at the implementation, legal regulation and organization of the collection of taxes and tax payments. These instruments serve for the distribution and redistribution of the gross domestic product and the formation of centralized funds of the state's monetary resources. The implementation of tax policy in Ukraine is carried out by using certain financial instruments and levers of the tax mechanism, using which the state creates conditions under which it becomes profitable for business entities to take into account the interests of the state in the course of their activities.

The effectiveness of the mechanisms of state tax policy contributes to the formation and development of the tax potential of the country. To assess the quality and effectiveness of the tax policy, it is necessary to consider a set of tools used by the tax authorities to implement the tax capacity building strategy. The implementation of the mechanisms of state tax policy is carried out on the basis of a combination of individual conceptual approaches.

On fig. 1 shows the main problematic aspects inherent in the modern development of national tax policy.



Source: Built on the basis of Izmailov, Yehorova and Tomchuk, 2022

Fig. 1. The main problems of the tax policy of Ukraine

With Russia’s full-scale invasion, the trajectory of tax policy has changed. This war has not only a military-technical aspect, but is also aimed at the economic exhaustion of the enemy. Therefore, it is especially important to implement an economic policy that would not only depend on the support of external allies, but also ensure the financing of the main functions of the state on the basis of the country’s internal resources. Under these conditions, tax policy becomes one of the key tools used by the state. Since the beginning of the introduction of martial law on the territory of the country, the Verkhovna Rada of Ukraine has actively begun to amend the tax legislation. In particular, for the period of martial law, a decision was made to suspend the deadlines determined by the Tax Code of Ukraine and other laws, compliance with which is monitored by regulatory authorities, primarily tax authorities. At the legislative level, the norms and features of taxation with value added tax, excise tax, corporate income tax and a single tax during martial law were established.

During a long period of active hostilities, the country’s economy managed to adapt to new conditions. The Office of the President, together with the Ministry of Economy, announced their intention to reduce the tax burden on businesses and began work on a radical tax policy. However, the Ministry of Finance of Ukraine and the parliamentary tax committee (Verkhovna Rada of Ukraine Committee on Finance, Tax and Customs Policy) opposed fiscal changes during the war period. To date, the discussion of radical tax policy has been suspended, because the war is not the time for experimentation. However, tax reform must pass regardless of the circumstances.

There is a common vision in the Cabinet of Ministers, the Ministry of Finance and the relevant committee of the Verkhovna Rada for the future tax policy and tax system, which consists in the existing potential for increasing state budget revenues through customs, markets for excisable goods (such as fuel, tobacco, alcohol) and improving the administration of tax on value added (VAT). However, with respect to administration, it is important to note that it is currently not possible to make improvements «on the side of the taxpayers» because of the moratorium on inspections that was introduced at the start of the all-out war.

At the same time, short-term goals in the field of taxation are set out in the Memorandum on Economic and Financial Policy with the International Monetary Fund (IMF). The primary goal is to return to the taxation system that existed before the start of the war, including bill No. 8401 on the return of checks and fines in the field of registrars of settlement transactions (RPO), the abolition of a single tax of 2 % and other measures.

Medium-term goals include the following:

Improvement of the VAT e-administration system taking into account the risk-based approach in order to reduce blocking measures for business.

Creation of a working tax risk management system: this requires automation and full coverage of the tax activity of the payer from the moment of its creation. The profile of the payer and the assessment of its riskiness should be the main factors determining the type of control.

Basically or exclusively electronic interaction of payers with tax authorities at all levels. Already, there are certain achievements, such as pre-filing of tax returns for individuals, an updated contact center is functioning, payer profiles are being created, an order has been placed for the development of software for electronic audit. In particular, the draft law on electronic excise stamp is in the second reading, and the functionality of the taxpayer’s electronic cabinet is constantly expanding.

In this context, digitalization is the main task, the main direction of the reform, in this plane is the improvement of tax relations. Another direction is to harmonize domestic tax legislation with EU norms, especially the need to introduce a transition period, which helps to reduce the negative impact of the transition to European standards for domestic business, should be emphasized. And another direction is aimed at strengthening the institutions of the three financial bodies: the State Tax Service, the State Customs Service and the Bureau of Economic Security. On the part of the relevant committee, a proposal was made that provides for a reboot of these three bodies, as well as holding an open competition for the position of head, recertifying all employees of these bodies to ensure their competence and ability to work effectively, raising salaries «to avoid corruption temptations», along with the introduction modern methods of management and risk compliance.

It is important to adhere to key principles, including the basic protection of property and business rights, as well as the protection of investments. All actions of law enforcement, tax and other fiscal authorities should be aimed at protecting business, since this is

a key aspect. The second is to create a level playing field for all in a competitive environment, without providing incentives or benefits that could distort competition. The third is the most simplified administration system and the possible reduction of the role of the human factor in this system. Another important aspect is harmonization with the regimes in force in the European Union. However, this should take into account the preservation of the competitiveness of the economy and the creation of incentives for the development of new industries. Relevant is the introduction of incentives that can be applied to all businesses, in particular, those operating in the field of highly intellectual labor and high-tech production (Kalashnik and Fedorin, 2023).

The need to develop a National Revenue Strategy, discussed within the framework of the cooperation program with the International Monetary Fund (IMF), stems from Ukraine's high current dependence on foreign aid and the need to reduce it in the future. The main goal of this strategy is to create conditions for the formation of a revenue base within the country in order to reduce dependence on external sources. One of the most important tasks of the strategy is to ensure fairness in the taxation system.

According to the IMF's «structural beacons» agreements, an appropriate action plan should be developed in May 2023, and the strategy itself should be approved by the end of 2023. The four-year EFF program with the International Monetary Fund provides that the second stage of the program will approximately begin in 2025 will focus on important structural tax and budget reforms to ensure medium-term revenues consistent with the implementation of the National Revenue Strategy, as well as improving public financial management and reforming the public investment management system to support the post-war recovery process. The memorandum with the IMF defines the key principles and objectives of tax policy and tax administration both for the short term and for the period of post-war renewal. It also defines the steps necessary for the preparation and implementation of the National Revenue Strategy.

Thus, in March 2023, the Cabinet of Ministers of Ukraine adopted a decision instructing the Ministry of Finance to start preparing the National Revenue Strategy for the period 2024–2030, taxes, which will be an input to the strategy roadmap. This is one of the 19 key requirements of the program. Further, with the support of IMF technical assistance, a gap analysis will be carried out to use this information in the roadmap for the National Revenue Strategy for the period 2024–2030, agencies, donors, the private sector and the public society under the leadership of the Ministry of Finance (Marchenko, 2023).

The Cabinet of Ministers of Ukraine, the State Tax Service, together with the IMF and other international partners, are consulting on changes to the tax system with two main goals: 1) ensuring the competitiveness of the national tax system in comparison with other countries; 2) building a tax model that enhances the efficiency of the culture of fulfilling tax obligations. Publication of the draft legislative changes regarding the modernized tax system in the public sphere and discussions will be possible only after the completion of discussions between the authorities and the global expert community (Ukrinform, 2023).

In this context, the concept of the 10–10–10 tax reform, which was presented by the Office of the President, is to reduce the rates of key taxes to 10 %: corporate income tax (currently 18%), personal income tax (18 %) and VAT (20 %). In addition, it was proposed to cancel the ERUs (22 % of the employee's wage fund, for sole proprietors – at least 22 % of the minimum salary) and double the level of military duty to 3 %. At the same time, it provides for the abolition of tax incentives, increased liability for violation of tax laws and the provision of access to information on bank accounts of taxpayers by the State Tax Service, that is, the abolition of bank secrecy (Shurma, 2023). The authors of the 10–10–10 reform believe that such innovations will increase State budget revenues by UAH 186 billion per year by «mobilizing numerous compensators that can significantly reduce the fiscal gap». In particular, all special regimes, optimizations, «twisting» and smuggling should disappear from the tax system, the payment of taxes should become mandatory for everyone, and salaries – only «white». The current European tax rules establish a certain level of freedom for Member States to choose their tax systems, but they are limited. One of them concerns VAT. Thus, the level of the basic VAT rate should not be lower than 15 % in order to prevent the emergence of structural imbalances in the EU and distortion of competition (contained in Council Directive 2006/112/EC of 28 November 2006 on common system of value added tax) (Council Directive 2006/112/EC, 2006). As already noted, one of the key areas of reform is the digitalization of the tax policy of Ukraine, which provides for the use of digital technologies and information systems in the field of taxation. The goal of this initiative is to facilitate taxation procedures and reduce administrative and financial costs for taxpayers and the state, as well as to improve the efficiency of payment control and combat tax crimes.

One of the main measures for the digitalization of tax policy is the creation of a single portal of state electronic services, where taxpayers can pay taxes, submit reports and other necessary documentation. In Ukraine, in 2023, it is planned to digitize the activities of the State Tax Service, in particular, the Concept «Tax in a Smartphone» has been prepared. For the State Tax Service, the main performance indicators will be: the speed and convenience of electronic services (reducing the duration of inspections, VAT refunds, processing tax returns); reducing the level of expenses for the maintenance of tax authorities in relation to taxes collected; the level of de-shadowing of the economy (reduction in the number of inspections, voluntary declaration, increase in the share of voluntary payment); improvement of the procedure for appealing decisions (Koznova, 2023).

In accordance with this, the priorities are: modernization of the STS contact center, creation of an interactive training base for taxpayers, convenient and understandable design of the taxpayer's e-cabinet, raising the level of culture of voluntary declaration, the introduction of Smart FLP, e-audit (SAF-T) and e- excise duty, PRO SOD, automation of work with Big Data for transfer pricing (TP) risk analysis, implementation of CRS and automatic exchange of interstate reports (CbC), etc.

The main differences between CRS and FATCA are:

- lists of non-accountable financial institutions and excluded accounts (FATCA has a wider list of exclusions). All banks are subject to CRS requirements unlike FATCA;
- CRS does not include lists of financial institutions from regulators;
- method of reporting (International Data Exchange Service (IDES) for FATCA and electronic cabinet – for CRS).

However, as of April 28, 2023, the Law of Ukraine dated March 20, 2023 No. 2970-X, concerning amendments to the Tax Code of Ukraine and other legislative acts of Ukraine regarding the implementation of the international standard for automatic

exchange of information on financial accounts (hereinafter referred to as Law 2970- IX) [36]. Beginning July 1, 2023, Law 2970- IX requires that accountable financial institutions of Ukraine apply due diligence on financial accounts to determine their accountable status. If the account is recognized as accountable (subject to exchange of information), the financial institution is obliged to include information about this account in the report on accountable accounts and submit this report to the State Tax Service of Ukraine. The new requirements for verification of financial accounts and reporting to the DPS apply to four categories of organizations, as defined in Section VIII of the General CRS Reporting Standard: depository institutions (banks, credit unions and others); custodial institutions (depository institutions performing depository activities, nominal holders); investment companies (investment firms, joint investment institutes, asset management companies and others); certain insurance companies (insurance companies, non-state pension funds). The CRS standard includes specific due diligence rules for accounts opened before July 1, 2023, as well as for accounts opened after that date. Defined rules and time frames for due diligence are applied.

It is important to note that the implementation of the CRS Standard is coordinated by the OECD Secretariat, with the aim of ensuring a unified approach of jurisdictions to its interpretation and application. Ukraine is implementing this international standard into its legislation and practice with the support of the Global Forum on Transparency and Information Exchange for Tax Purposes and the European Union Program for Support of Public Finance Management in Ukraine (EU4PFM) (Law of Ukraine on the implementation in Ukraine of the Common Reporting Standard CRS, 2023).

Law 2970-IX implements provisions of several international treaties and standards into Ukrainian legislation, including:

- CRS Multilateral Agreement (Multilateral Competent Authority Agreement on Automatic Exchange of Financial Account Information) – agreement of competent authorities on automatic exchange of information on financial accounts.
- Multilateral agreement CbC (Multilateral Competent Authority Agreement on the Exchange of Country-by-Country Reports) – an agreement of competent authorities on the automatic exchange of reports across countries.
- QCAA (Qualifying Competent Authority Agreement), concluded between the competent authorities of Ukraine and a foreign jurisdiction, containing provisions on the exchange of information for tax purposes, in particular, on the automatic exchange of reports across the countries of the international group of companies.
- CRS (Common Standard on Reporting and Due Diligence for Financial Account Information) is a standard for reporting and due diligence of financial account information.

Agreements between the Government of Ukraine and the Government of the United States of America to improve the implementation of tax rules and the application of the provisions of the US Foreign Account Tax Claims Act (FATCA).

The specified Law 2970-IX takes into account these international treaties and standards in order to effectively implement their requirements in the context of Ukraine. This Law is part of the implementation of the BEPS (Base Erosion and Profit Shifting) plan developed by the OECD. The introduced automatic exchange of financial and tax information is one of the tools of the BEPS plan and is aimed at ensuring that the competent authorities have access to this information in order to effectively identify undeclared income of tax residents outside the countries and control the correctness of income declaration and tax payment.

The automatic exchange of financial and tax information is planned to be launched in mid – 2023, and in 2024 the tax authorities of the countries participating in the above-mentioned international agreements will exchange information for 2023. Since Law 2970- IX provides for reporting for the automatic exchange of financial information to other countries – participants for the previous six months. However, if other countries participating in the CRS collect information from the beginning of 2023, the Ukrainian tax authorities may receive information on Ukrainian payers in such countries for the whole of 2023.

In addition, Law 2970-IX introduces the concept of an international group of companies and obliges Ukrainian taxpayers who are members of the corresponding international group of companies to submit a notification of their participation in an international group of companies before October 1 of the next year after the reporting one (Law on the implementation of international standards for the automatic exchange of information on financial accounts, 2023).

The main challenges of the state policy of mobilizing internal revenues and compliance with tax laws are the multidimensional nature of these problems, the peculiarities of the organization of tax administration, the lack of financial resources and the difficulty of tracking and controlling business entities and citizens using tax evasion schemes. Additional risks are the digitalization and globalization of the economy, which creates new opportunities for tax evasion and loss of tax revenues in countries. In addition, it is important to strike a balance between stimulating economic growth and constantly filling the budget with tax revenues of the budget, as well as preventing corruption risks and lack of transparency in the tax system, which can lead to the use of tax mechanisms to pursue political goals or satisfy the interests of certain groups of the population (Mathias and Wardzynski, 2023).

Increasing tax compliance and transparency is based on ensuring effective tax administration. First, the problems of compliance with tax laws are due to the concealment of taxable income by taxpayers, which entails a decrease in revenues to the budget revenues. To do this, it is necessary to strengthen the counteraction to the use of: money laundering schemes, cash transactions, offshore accounts and other forms of non-transparent financial activities. Secondly, taxpayers' avoidance of domestic tax obligations leads to inequality in the distribution of budgetary resources and a deterioration in the quality of the state policy of social justice, which negatively affects the lives of citizens, and also poses a threat to the country's economic development. A common practice is to try to avoid paying taxes by: transferring assets/income to other jurisdictions, reducing the tax rate, or exempting profits from taxation without legal grounds. A possible solution to this problem is the effective exchange of information between the tax authorities, increasing the transparency of financial reporting and increasing penalties for tax fraud.

In this context, ensuring transparency and beneficial ownership is one of the key areas of tax compliance, as it helps to prevent tax evasion and illegal financial flows. This can be achieved through measures such as mandatory beneficial ownership disclosures, effective monitoring of transactions involving high-risk entities or sectors, and the use of data analytics and other technologies to detect potential tax evasion.

At the same time, access to information in financial intelligence registers is an effective tool for the tax authorities in identifying possible tax evasion and enforcing tax laws. However, access to this information may be restricted due to privacy policy. In this regard, international cooperation on the exchange of tax information is essential for tax compliance and transparency, as it helps prevent tax evasion and promotes a level playing field for businesses and individuals.

Corruption in the tax administration system can undermine the effectiveness of tax compliance and transparency measures because it allows some taxpayers to evade taxes or gain undue advantage through bribery or other forms of illegal activity.

Consequently, the application of the proposed measures to improve and form the tax policy will allow the domestic economy to function smoothly and with minimal losses for society to go through a military conflict. In general, the implementation of an effective tax policy is a key factor in ensuring national financial and economic security, as well as the development of a sustainable and competitive economy.

5. Conclusions

Prospects for further research on the identified issues are seen in the development of a doctrinal model of the draft Strategy for the development of tax policy for the medium term until 2030, which should be strategically verified and based on a holistic integrative model of the system of principles of the rule of law and sectoral legal frameworks with appropriately identified financial indicators. For each of these areas to determine the strategic goals to achieve which the efforts of the main manager of financial resources in the country will be directed, as well as quantitative and qualitative indicators indicating their achievement. One of the new directions for optimizing tax policy may be a set of proposals for creating fair institutional conditions for taxing households and formulating recommendations for establishing rules and procedures for their taxation.

The wide involvement of participants in this professional discussion, namely tax specialists, scientists, an expert audience on taxation issues, the macro level – public finance will contribute to the development of the Strategy–2030, which will form the basis for the sustainable and inclusive development of tax policy and the national economy as a whole, improving welfare all citizens of Ukraine. Reforming the national tax system and introducing strategic documents of the Ministry of Finance and the State Tax Service will increase the transparency of the budget, the possibility of channeling financial resources for the implementation of state targeted programs, for the rational use of limited resources, reducing social inequality in Ukrainian society, reducing corruption, etc. Such a comprehensive approach to reform will give a powerful impetus to achieve a high level of development of the national economy in the medium term.

References:

1. *Agreement between the Government of Ukraine and the Government of the United States of America on improving the implementation of tax rules and the application of the provisions of the US Foreign Account Tax Claims Act (FATCA)*, dated 07.02.2017, [Online], available at: https://zakon.rada.gov.ua/laws/show/840_005-17
2. «Another year when taxes are not enough to wage war. Finance Minister Sergei Marchenko on the principles of financial survival of a country at war», *Forbes*, [Online], available at: <https://forbes.ua/money/shche-odin-rik-koli-podatkov-ne-vistachae-shchob-vestivynu-ochilnik-minfinu-sergiy-marchenko-pro-printsipi-finansovogo-vizhivannya-voyuyuchoi-kraini-05052023-13466>
3. Archiereiska, N.V., Panaseiko, I.M. and Panaseiko, M.S. (2022), «Features of the tax policy of Ukraine in modern conditions and ways to improve it», *Scientific view: economics and management*, No. 3 (79), pp. 164–172.
4. Bakhmach, A.A. (2020), «Participation of Ukraine in the international system of automatic exchange of tax and financial information (according to the CRS standard) in the context of criminal liability for tax evasion in Ukraine», *Scientific works of the National Aviation University. Ser. Legal Bulletin «Air and Space Law»*, Vol. 2, No. 55. pp. 177–183, doi: 10.18372/2307-9061.55.14792.
5. Betz, N. (2019), *Introduction of automatic exchange of financial information in Ukraine in 2020: how to prepare businesses for the first exchange*, [Online], available at: <https://eba.com.ua/article/vvedennya-avtomatichnogo-obminu-finansovoyu-informatsiyeyu-v-ukrayini-v-2020-rotsi-yak-pidgotuvats-biznesu-do-pershogo-obminu/>
6. *Composition of Directive 2006/112/EC of 28 November 2006 on a common value system*, [Online], available at: <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:32006L0112>
7. *On Amendments to the Tax Code of Ukraine regarding the implementation of the international standard for automatic exchange of information on financial accounts*, Conclusion on the draft Law of Ukraine, [Online], available at: <https://itd.rada.gov.ua/billInfo/Bills/pubFile/1540504>
8. Desyatnyuk, O. and Marchenko, L. (2021), «Scientific and methodological determinants of tax policy in the context of the transformation of the national economy», *The world of finance*, No. 4 (69), pp. 8–19.
9. Dmitrenko, T.L. and Volkova, V.M. (2022), «Decentralized finance in the modern financial system: development and risks», *Scientific works of NIFI*, No. 1, pp. 55–68.
10. Drach, S. (2019), «Automatic exchange of tax information: what can Ukraine expect?», *Legal newspaper online*, Jan 30, [Online], available at: <http://yur-gazeta.com/dumka-eksperta/avtomatichniy-obmin-podatkovoyu-informaciyeyu-chogo-chekati-ukrayini.html>
11. *Draft Law on Amendments to the Tax Code of Ukraine on the implementation of the international standard for automatic exchange of information on financial accounts*, No. 8131 dated 10/17/2022, [Online], available at: <https://itd.rada.gov.ua/billInfo/Bills/Card/40674>
12. Gritsenko, A.A. (ed.) (2022), *Economic contradictions of globalization and localization in the conditions of hybrid war and post-war reconstruction*, monograph, National Academy of Sciences of Ukraine, Institute of Economics and Forecasting of the National Academy of Sciences of Ukraine, Electron. Data, K., 636 p., [Online], available at: <http://ief.org.ua/wp-content/uploads/2022/12/Ec-superech-globaliz-ta-localiz-v-umomah-gibryd-viyny.pdf>
13. Efimenko, T.I. and Dmitrenko, T.L. (2022), «Modern priorities in the field of combating money laundering and the financing of terrorism», *Scientific works of NIFI*, No. 2, pp. 5–20, doi: 10.33763/npndfi2022.02.005.

14. *On amendments to the Tax Code of Ukraine regarding the implementation of the international standard for automatic exchange of information on financial accounts*, Explanatory note to the draft Law of Ukraine, [Online], available at: <https://itd.rada.gov.ua/billInfo/Bills/Card/40674>
15. Galaburda, A.S. and Shevchenko, S.A. (2022), «Tax policy under martial law», *Economic Bulletin of the University*, Issue 54th, pp. 123–130.
16. Gretska, S.M. and Gretska, Ya.V. (2020), «Coordination of the efforts of the world community to ensure the fulfillment of the tax debt», *Comparative-analytical law*, No. 3, pp. 221–228.
17. *How Rostislav Shurma, Deputy Chairman of the Presidential Office, plans to save the economy*, [Online], available at: <https://forbes.ua/inside/ya-prikhlnik-radikalnikh-podatkovikh-zmin-yak-planue-ryatuvati-ekonomiku-zastupnik-golovi-op-rostislav-shurma-intervyu-16082022-7719>
18. *In Ukraine, they want to launch the concept of «Tax in a smartphone»*, [Online], available at: https://biz.ligazakon.net/news/217009_v-ukran-khochut-zapustiti-kontseptsyu-podatkova-u-smartfon
19. Ivanitskaya, O.M. (2022), «International cooperation in the field of combating tax evasion and the introduction of the Common Reporting Standard (CRS)», *Finances of Ukraine*, No. 9, pp. 7–21, doi: 10.33763/finukr2022.09.007.
20. Ivanitskaya, O.M., Koshchuk, T.V. and Oleinikova, L.G. (2022), «Organizational bases of automatic exchange of information for tax purposes according to the CRS standard», *Finances of Ukraine*, No. 6, pp. 54–69, doi: 10.33763/finukr2022.06.054.
21. Izmailov, Ya., Egorova, I. and Tomchuk, Yu. (2022), «Improving the tax system as a component of the international security of Ukraine», *Economic analysis*, Vol. 32, No. 2, pp. 82–89, doi: 10.35774/econa2022.02.082.
22. Kasperovich, Yu.V. (2019), «Increasing the efficiency of tax control in Ukraine based on the implementation of international tools for automatic exchange of tax information», *Analytic note. Ser. Economy*, No. 8, [Online], available at: <https://niss.gov.ua/sites/default/files/2019-12/analit-kasperovych-economics-8-2019.pdf>
23. Kosse, D.D. (2020), «Legal support of automatic exchange of tax information according to the CRS standard in relation to tax residents of Ukraine», *Actual problems of improvement of the current legislation of Ukraine*, No. 54, pp. 101–118, doi: 10.15330/apiclu.54.101-118.
24. Marchenko, V.B. (2018), «Formation of the legal basis for Ukraine’s participation in the international exchange of tax information», *Legal scientific electronic journal*, No. 6, pp. 84–89, [Online], available at: http://www.lsej.org.ua/6_2018/63.pdf
25. Mathias, E. and Wardzynski, A. «Leveraging Anti-Money Laundering Measures to Improve Tax Compliance and Help Mobilize Domestic Revenues», doi: 10.5089/9798400240409.001.
26. *National economic strategy for the period up to 2030: approved. Decree of the Cabinet of Ministers of Ukraine dated March 03, 2021 No. 179*, [Online], available at: <https://www.kmu.gov.ua/npas/pro-zatverdzhennya-nacionalnoyi-eko-a179>
27. *National income strategy should reduce Ukraine's financial dependence on partners – Marchenko*, [Online], available at: <https://biz.censor.net/n3414864>
28. *National Security Strategy of Ukraine: approved. Decree of the President of Ukraine* (2020), dated September 14, No. 392/2020, [Online], available at: <https://www.president.gov.ua/documents/3922020-35037>
29. Nechiporenko, A.V., Panchenko, I.V. and Moroz, L.A. (2021), «Status and prospects for the development of the tax policy of Ukraine», *Business Inform*, No. 5, pp. 348–354.
30. Nechiporenko, A.V., Panchenko, I.V. and Moroz, L.A. (2021), «Status and prospects for the development of the tax policy of Ukraine», *Business Inform*, No. 5, pp. 348–354.
31. Nikitishin, A.O. (2019), *Tax policy in the context of economic transformations*, monograph, Kyiv. nat. trade-economy un-t, Kyiv, 480 p.
32. Oleinik, Ya.V. and Kucheryava, M.V. (2021), «Assessment of Ukraine’s readiness for international automatic exchange of information for tax purposes», *Finances of Ukraine*, No. 2, pp. 85–97, doi: 10.33763/finukr2021.02.085.
33. *On amendments to the Tax Code of Ukraine and other legislative acts of Ukraine on the implementation of the international standard for automatic exchange of information on financial accounts*, [Online], available at: <https://zakon.rada.gov.ua/laws/show/2970-IX>
34. Cabinet of Ministers (2021), *On the approval of the Strategy for reforming the public financial management system for 2022–2025 and the action plan for its implementation*, Order of December 29, No. 1805-r., [Online], available at: <https://www.kmu.gov.ua/npas/pro-shvalennya-strategiyi-reformuvannya-sistemi-upravlinnya-derzhavnimi-finansami-na-20222025-roki-ta-planu-zahodiv-z-yiyi-realizacii-i291221-1805>
35. Schwager, O.A. (2017), «Topical issues of legal regulation of avoidance of double taxation in Ukraine», *Legal horizons*, Issue 6 (19), pp. 11–16, doi: 10.21272/legalhorizons.2017.i6.p11.
36. *Tax policy*, [Online], available at: <https://mof.gov.ua/ru/tax-policy>
37. *The Law of Ukraine on the implementation in Ukraine of the Common Reporting Standard CRS came into force*, [Online], available at: <https://www.kmu.gov.ua/news/nabrav-chynnosti-zakon-ukrainy-shchodo-implementatsii-v-ukraini-zahalnoho-standartu-zvitnosti-crs>
38. *Ukraine has adopted a law on the introduction of international standards for the automatic exchange of information on financial accounts*, [Online], available at: <https://www.lexology.com/library/detail.aspx?g=5c38b1be-211b-42f8-a997-222279338de5>
39. *Ukraine is consulting with partners on a new model of the tax system – OP*, [Online], available at: <https://www.ukrinform.ua/rubric-economy/3616402-ukraina-konsultuetsa-z-partnerami-sodo-novoi-modeli-podatkovoi-sistemi-op.html>