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## **Tax risks of the enterprise in the conditions of globalization**

*The article reveals the essence of tax risks of the enterprise; the types of losses they will receive in the event of certain tax risks are described. It is noted that the tax risks of the enterprise should be analyzed in terms of economic, legal and social plane. The external and internal factors of tax risk of business entities are identified; the directions of influence of tax risks on financial and economic security of the enterprise are characterized. The constituent elements of the mechanism of neutralization of tax risks of the enterprise are given. An algorithm for the implementation of the process of tax risk management in domestic enterprises and approaches to the analysis of the probability of their occurrence are presented. The essence of tax planning at the enterprise is described. The expediency of conducting a high-quality audit of the payment of taxes and fees by the company, which will reduce tax risks, increase payment discipline and form the optimal tax burden on the company, is proved. The necessity of forming an effective system of tax compliance is substantiated. It is noted that such a system will prevent conflicts between enterprises and the state in the field of taxation and will help to avoid significant losses on both sides.*

*Keywords: tax risks, tax security, tax planning, tax optimization, tax audit, tax compliance, taxpayers, enterprise.*

**Problem statement.** The operation of economic entities is constantly accompanied by uncertainty, which contributes to the emergence of various types of business risks, which lead to different losses of monetary and property nature. Today, Ukrainian enterprises operate in the context of increasing globalization processes, instability in the domestic economic system, frequent crises in the political sphere, which significantly increases the economic risks, which adjust their profits downwards. Such conditions significantly complicate frequent changes in the legislation in the field of taxation of business structures, high fiscal pressure and a significant amount of the shadow sector of the economy, as this situation increases the level of tax risks. The key to their reduction in the enterprise is the organization of an effective system of tax risk management of the business structure, which will help to achieve a rational relationship between the individual elements of fixed and variable costs.

Effective management of tax risks will create the preconditions for the correct definition and timely fulfillment of tax obligations in full, which, in turn, will be the key to improving the efficiency of the enterprise as a whole. In addition, effective tax risk management will allow you to legally optimize mandatory payments, reduce costs and increase financial results. On the other hand, the state needs to build an effective system of control over compliance with tax legislation in order to ensure the mobilization of budgets of all levels of planned revenues and full financing of expenditures. The system of taxation of enterprises should not hinder their development, but, on the contrary, promote the intensification of entrepreneurial activity as a basis for increasing budget revenues and balancing the interests of the state and taxpayers. In view of the above, the construction of a tax risk management system in Ukraine in order to increase the efficiency of the business sector in the financial system as a whole is becoming relevant today.

**Analysis of recent research.** The following Ukrainian scientists, in particular: O. Desyatnyuk, V. Kanyuk [1], Ya. Dzetsko, H. Melnychuk [2], V. Kanyuk [3; 4], V. Kozlova [5], P. Kolomiyets [6], V. Kurylo, V. Mushenok, O. Ryzhenko [7],

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V. Luchko, A. Zinkevych [8], T. Melikhova, O. Troyan [9], N. Moskalenko [10], O. Osadcha [11], K. Sokolova [12], L. Chudak [13] and others.

However, not all aspects of this problem are fully covered and sufficiently substantiated. This applies to the definition of methods of analysis of tax risks and finding ways to minimize, the organization of the compliance system in the enterprise, taking into account foreign experience in the process of managing tax risks of economic entities, and so on.

**The paper purpose** is to research of features of tax risk management at the enterprises of Ukraine and to identify directions of their minimization in the conditions of globalization.

**Major research findings.** Uncertainty in the tax sector of the state is the main factor in reducing the effectiveness of government fiscal policy and creates the preconditions for increasing the level of the shadow economy in the country due to the growing tax risks of enterprises. This requires the state to take a set of measures to minimize losses in budget revenues, which are provoked by high uncertainty in the tax sphere and an imbalance in the interests of the government and businesses. Conflicts of interest between the state and taxpayers arise during the distribution of performance through fiscal instruments. It encourages the latter to identify ways to reduce tax payments and, thus, to leave at their disposal most of the financial results. On the other hand, public needs are constantly growing, so the government is forced to seek additional sources of financial resources to finance them, which, without increasing the tax capacity, becomes impossible.

Given the different interests in the field of taxation, tax risk is also considered in parallel, and its essence is often interpreted ambiguously. In the modern scientific literature, the interpretation of tax risk is quite common, which characterizes the level of uncertainty in the future in the fiscal sphere. For the state, its consequences are a lack of planned budget revenues and an increase in the state budget deficit. For the business sector, tax risks are accompanied by losses or a decrease in net income. In general, the economic meaning of tax risks is interpreted as the probability of occurrence of uncertain events in the field of taxation, which will result in losses or complete or partial failure to achieve the objectives set by businesses or the state.

The emergence of tax risk is associated with the uncertainty of the situation regarding the adoption of optimal decisions in the field of reducing conflicts between the subjects of the tax system and balancing the interests of the state and business structures in order to achieve strategic goals. From the point of view of business entities, tax risk is considered as a financial category that characterizes the peculiarities of taxpayers' response to uncertainty about the loss or reduction of net financial results in the future due to the process of administration of mandatory payments and fees to the state.

For businesses, the object of fiscal risk is government tax policy, ie the functioning of tax authorities in the field of tax collection. In order to eliminate this risk, companies need to analyze the tax policy of the state, its sequence, changes in legislation and so on. It should be noted that in the conditions of reforming the economy of Ukraine, it is impossible to completely avoid tax risks.

The tax risk of business entities has a number of methodological features that must be taken into account in the process of disclosing its economic content. Usually, tax risk is understood as the probability of occurrence of negative phenomena and events, which entail uncertainty and the risk of loss of benefits. It should be emphasized that due to the occurrence of risky events, the business structure may also receive additional benefits in the form of increased financial results, savings of material or monetary resources, reducing the cost of production and more. In general, such positive results or losses due to tax risk can be divided into material (reduction of profit or loss of revenue, increase in production costs, etc.) and the occurrence of negative legal and/or socio-psychological events (sanctions, revocation of license, loss of company image, termination activities).

It is advisable to analyze the tax risk of the enterprise in terms of economic, legal and social sphere. It determines the final value of the net profit (or loss) of the firm, because all taxes are laid in the elements (revenue, cost, profit), which are taken into account when calculating financial results. In addition, the profits of enterprises will be significantly affected by the introduction of new mandatory payments, adjustment of tax rates, manipulation of tax benefits, the introduction of fines and penalties for violations of tax laws, etc. Building an effective system of fiscal risk management will help significantly reduce the above losses for the company. In addition, the violation of tax legislation may result in the opening of criminal cases and the provision of access to such information to the public, which would jeopardize the existence of the business structure as a whole.

Note that the opposite of the goals in the process of distribution of gross domestic product of the tax system is the reason for the interpretation of tax risks from two points of view – the state in the face of fiscal authorities and taxpayers (citizens and businesses). The country's tax and administrative bodies support the government's policy and aim to ensure that mandatory payments are received regularly and in the planned amount to the country's budget system. In addition, they constantly analyze and identify reserves for additional mobilization of financial resources to the state treasury. In turn, businesses (especially in the field of material production) and the population will try to significantly reduce the amount of tax liabilities. The degree of their reduction will be influenced by the level of tax culture in the countries and the transparency of the process of formation and use of public funds. Given the high tax culture, taxpayers will consciously comply with tax laws, as they clearly know in which areas they use the funds mobilized by the state and what results will be obtained. Otherwise, businesses will minimize fiscal payments in legal and shady ways, and if tax controls are tightened and penalties cannot be avoided, they will cease business. The main reason for the emergence of tax risk, businesses see in the negative innovations in tax law, which will contribute to the emergence of losses in various forms.

The tax risk of economic entities is determined by external and internal factors that create uncertainty and are the cause of conflicts between the subjects of the tax system. The first include factors, the emergence of which does not depend on the functioning of the enterprise – they depend on the fiscal activity of the state as a whole and are determined by the peculiarities of government tax policy. Internal factors directly determine the effectiveness of the management decision-making process at the enterprise, which relate to taxation and allow to optimize the amount of fiscal payments.

Tax risks at the level of business entities have many features and specifics of manifestation. It is advisable to include them in economic risks in general and financial in particular, as they have a wide range of negative consequences that affect not only financial but also economic activities in general. Tax risk arises for all businesses that are required to pay mandatory payments set by the state, so it is comprehensive. It is present in almost all activities of the enterprise, which according to the law are subject to taxation. The consequence of tax risks can be both losses and gains depending on the type of tax policy pursued by the state (increasing tax pressure, providing tax benefits or simplifying the tax regime of business structures). At the same time, the use of methods to minimize mandatory payments in enterprises can also help reduce costs and save financial resources. On the other hand, businesses can accidentally violate tax laws and thus save their own money. If such a violation was not detected by the tax authorities, it may encourage business leaders to repeat it one or more times. However, such actions increase the company's tax risks, because then it increases the likelihood that in the process of conducting a comprehensive audit by the fiscal authorities, they will be identified and apply financial sanctions to such taxpayers, which can seriously affect its business.

The main way to strengthen the financial condition of the business entity and increase its level of financial security is effective management of tax risks, which will minimize fiscal liabilities and respond in a timely manner to changes in government tax policy. Changes in government policy in the field of taxation are external factors that affect the activities of enterprises, so it is necessary to take a set of measures to minimize their negative impact or use the full positive effect.

Tax risks affect the economic security of the business structure in the form of external and internal factors, which are grouped in Fig. 1 and give a clear idea of the levels of their occurrence.

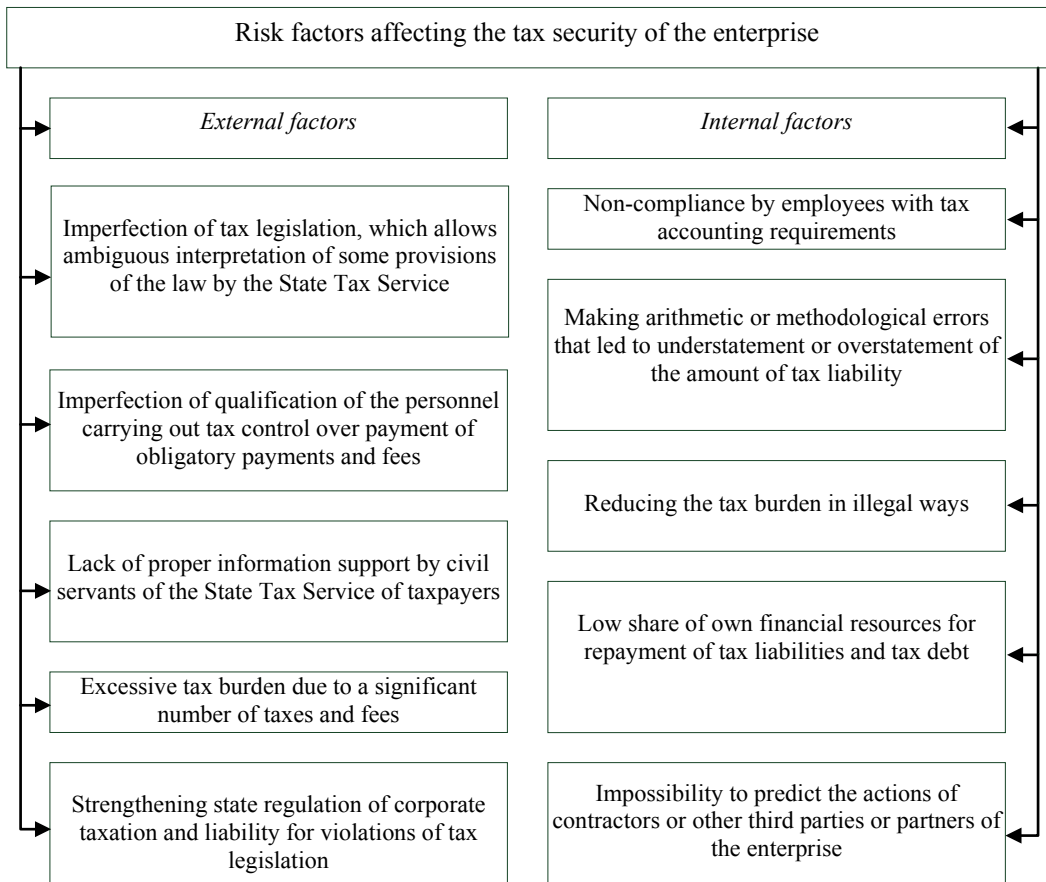


Fig. 1. External and internal factors of tax risks that affect the tax security of the entity  
 Source: built by the authors on the basis [13, p. 646].

It should be noted that the economic security of an entity is usually affected by subjective internal factors, the effect of which can be offset by the implementation of effective tax policy and the application of effective methods of tax risk management.

The mechanism of neutralization of tax risks is the formation of an effective policy of the business entity in this area. It covers the following elements:

- choosing a tax regime that will help reduce the amount of mandatory payments and reduce the level of fiscal burden on the business structure;
- structure of tax payments and receipts, formation of the schedule of payment of taxes and the analysis of possibility of reception by the enterprise of tax privileges;

- identification of legal ways to defer payment of taxes and fees for long periods of time;
- ensuring high payment discipline at the enterprise in order to monitor the correct calculation, payment in certain tax periods and in full mandatory payments;
- effective organization of accounting, analysis and monitoring of the functioning of the business entity and the payment of taxes and fees;
- control to reduce risks in the field of taxation.

In our opinion, the formation and implementation of an effective policy in the field of taxation will allow the business entity to build an effective management system for payment of mandatory payments and reduce the fiscal burden on the company, develop a mechanism for planning tax payments, organize a system of tax risk control and level them, to develop a scheme for professional development of financial managers and employees of the enterprise. In large firms and multinational corporations, considerable attention needs to be paid to the diversification of tax risks. This process means the integrated use of several taxpayers (division of the business entity into smaller branches in order to reduce the amount of mandatory payments), forms of contracts and tax regimes, which will minimize the overall level of risk for the company as a whole in case of problems with certain branch or affiliate. Under such conditions, losses for one taxpayer are offset by savings on mandatory payments in others. This practice is widely used by domestic large companies, which in order to minimize tax payments will divide their business into small units, which begin to work on a simplified system of taxation. In such conditions, the budget system loses large amounts of revenue and increases the budget deficit.

An important aspect of ensuring the tax security of Ukrainian businesses is the low fiscal culture. In such a situation, the government is forced to take care of achieving a high degree of tax security of the state, which will contribute to the effective management of tax risks by enterprises. Given the difficult socio-economic situation in Ukraine, it is advisable to take into account the experience of leading countries in the field of tax security of economic entities, which will help ensure a high level of tax culture in the country and reduce fiscal risks at the state level. In turn, this will help reduce the size of the shadow economy in the national economic system, increase budget revenues and improve financial discipline in the fiscal sphere.

The formation of an effective system of financial security of the entity requires the identification of specific negative factors and risks in the future. In the modern scientific literature, several key areas of fiscal risk are identified, which will determine the level of economic security of the enterprise.

The first area is characterized by almost zero risk, ie in terms of compliance with tax legislation, avoidance of shadow areas and criminal activity, its risk in the field of taxation will be at the lowest level. It is worth noting that any risk cannot be reduced to zero, as there are various forms of major circumstances that do not depend on the entity.

The second area contains low tax risk, which is the probability that an entity will incur partial losses in financial results if it is subject to financial penalties for non-compliance with tax laws.

The third area is characterized by high tax risk. At this level of risk, the probability of obtaining zero profit or loss of a significant amount of financial results, which is a consequence of unfavorable terms of contracts, the application of penalties to the company and so on.

The critical level of tax risk is present in the fourth area. In such circumstances, there is a high probability that the entity will incur significant losses, which will include loss of financial results (loss of revenue and, consequently, profit from operating activities) and part of the assets. This situation may result from the company pursuing a policy of reducing mandatory payments by violating tax laws and detecting such actions by tax inspectors. Sanctions for such crimes can be quite significant and significantly exceed the correctly charged mandatory fees and charges. Paying huge fines can result in the loss of market share and production capacity, a

reduction in current assets and an increase in liabilities. Under the influence of tax risks in this area, the company can significantly worsen its financial condition and find itself on the verge of bankruptcy. This requires reorganization measures and attracting additional financial resources to invest in operating activities.

The latter area contains extremely high tax risks, which have the ability to terminate the activities of the entity. In the case of mass evasion of mandatory payments and shady activities, tax sanctions can be so significant that the company will not have enough of its own assets to repay them and the court will declare it bankrupt.

Thus, fiscal risks have a significant impact on the level of financial security of the entity, which requires the construction of an effective management system that will allow monitoring, assessment, analysis, planning and control of tax risks. To do this, the company develops an effective tax policy, which outlines a set of measures to prevent tax risks and aims to maintain a high level of economic security, maximize financial results and create conditions for increasing market value of the business structure.

It is worth noting that reducing the total amount of mandatory payments and fees of the company will not help it achieve a high level of economic security. For this, the business entity needs to increase its own tax discipline, culture and comply with tax laws in general, to implement an effective tax policy that will minimize fiscal risks. Proper payment of mandatory payments will help create a positive image of the company as a diligent taxpayer and increase its role in budgeting, which will be an important factor in increasing its investment attractiveness and ensuring a stable financial position in the long run.

It is advisable for companies to conduct various types of analysis in relation to business risks in order to identify the factors of their occurrence, assess the probability of occurrence, forecast possible losses, and so on. This will make it possible to outline a set of measures to reduce their impact on the company's activities in the future, as well as to achieve positive results from compliance with tax laws and raise the company's image in the investment market.

Today, scientists and practitioners are working on a complex problem – the development of theoretical and methodological tools for risk analysis in the field of taxation, which requires the construction of a clear algorithm and methods of their analysis given the identified factors of their occurrence. The main stage of tax risk management is their analysis (Fig. 2), which allows to weigh the amount of losses and the probability of their receipt by each.

An objective and subjective approach is used to assess the probability of occurrence of risky phenomena in the field of taxation. Objective is characterized by the use of a formalized calculation of the frequency of occurrence of an event involving tax risk, taking into account the amount of losses due to its occurrence. The second approach is based on the calculation of the probability of occurrence of risky phenomena and volumes based on their own experience, intuition and expectations of business leaders who monitor compliance with tax laws. Note that in terms of using the latter method with the involvement of experts, their values of the probabilities of the studied risk phenomena may differ significantly, as they are not supported by calculations, and the vision of the future situation at the enterprise and in the country may differ. Experts may vary the amount of losses due to the occurrence of risky events, as they are also based on their own vision and assumptions. In addition, a number of risks cannot be valued because they do not cause monetary, financial or property losses. Many risky tax events can result in a variety of sanctions, revocation of licenses, and criminal liability for large-scale tax evasion. On the other hand, the state can also assess the amount of damage caused by enterprises due to non-compliance with tax legislation and intentional conduct of shadow or criminal activities. Usually, the occurrence of such risky events leads to incorrect use of tax planning and forecasting methods, ways to minimize tax payments and so on.

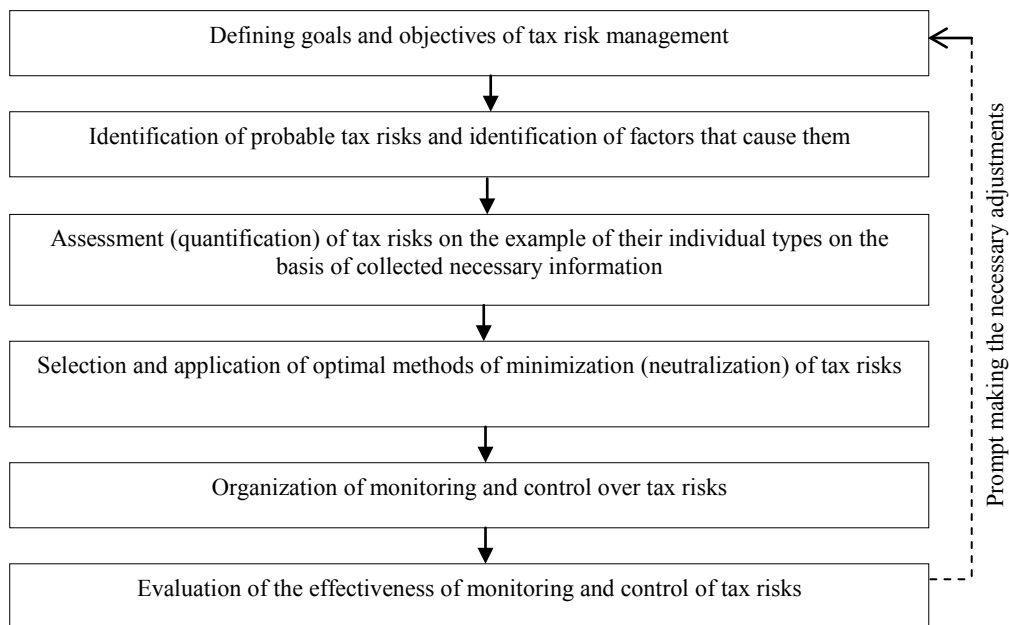


Fig. 2. Algorithm for implementing the process of tax risk management of enterprises  
Source: built by the authors on the basis [4, p. 181].

It should be noted that the consequences of tax risks can be quite burdensome for the company and manifest itself in the social and legal sphere, as gaining publicity about the company's crimes can significantly affect its business image and increase the negative attitude towards the business entity as a dishonest taxpayer. partners and consumers of products or services. Such consequences are difficult to assess in terms of value, but they can lead to catastrophic losses, bankruptcy, criminal prosecution of company managers and confiscation of property of management staff.

The ideal cost calculation of the probability of occurrence of a risky phenomenon in the field of taxation of the business structure and the amount of losses from its occurrence will be in the presence of complete and reliable information about such risky tax events and the ability to determine the amount of losses. Usually in a market economy, the amount of such information is limited, which does not contribute to the effective use of quantitative methods of tax risk assessment. This situation increases the interest of businesses in using quality methods of risk analysis in the field of taxation. Quite popular among them are: the method of analogy, decision tree, ensuring good integrity (job integrity), Monte Carlo, rating method, expert assessments, analysis of the break-even point, taking into account the tax factor, and others.

An important place in the financial management system at the enterprise is occupied by the mechanism of financial resources planning, which allows to increase the efficiency of their use and increase the net profit and market value of securities. The main component of this mechanism is the planning of taxes and mandatory payments that the entity pays from revenue, payroll, financial results and other objects of taxation, taking into account the time limits of their administration. The use of tax planning makes it possible to legally minimize taxes and fees and becomes a prerequisite for optimizing mandatory payments and the tax burden on the business structure. The essence of the tax planning process is revealed in the area of using legal directions to rationalize the future amount of accrued and paid tax payments to generate high financial results and ensure the financial stability of the entity.

Such areas include legally permitted methods, techniques and means of minimizing tax payments in order to reduce the fiscal risks of the enterprise.

The tax planning system of an economic entity is designed to help achieve strategic goals, maintain a stable financial position and create a positive reputation in the market of a firm that faithfully fulfills its main responsibilities to the state and society. The task of such a system can in no case be to evade the payment of mandatory payments and to conduct shadow activities in order to generate excess profits by violating tax laws and increasing the level of unfair competition.

In general, tax planning should be characterized as a set of measures to develop and implement legal ways to minimize the amount of accrued and paid in the future mandatory payments and fees through the use of financial planning techniques that will anticipate and prevent tax risks.

There are Anglo-Saxon and Romano-Germanic systems of planning taxes and fees. The first involves managing the activities of the entity in such a way as to significantly reduce the amount of taxes and fees for a certain period of time (tax period) in compliance with tax laws. The latter is characterized by the definition of such types of business activities and investment of financial resources, which will minimize the amount of future tax payments and fees. In general, it does not matter which system the company will follow in planning mandatory payments, it is important to financially justify the legal framework and properly maintain accounting and tax accounting for all activities and operations.

The problem of streamlining the amount of taxes and fees usually involves the development of an effective policy in the field of taxation, characterized by the implementation of the optimal regime of payment of mandatory payments in the course of business activities and various transactions.

The process of planning mandatory payments is interrelated with the functions of management (forecasting, analysis, control, personnel management, marketing, etc.), so it should be emphasized that it affects the performance of the entity, because determining the financial results of the business structure it is not possible to carry out without taking into account the payment of taxes and fees.

The planning of taxes and fees and their rationalization are the key parameters of planning the financial resources of the entity and its financial management. Building an effective system of planning mandatory payments will significantly reduce the likelihood of risky events in the field of corporate taxation, ie incorrect determination of taxes, extraordinary inspections by regulatory authorities, imposition of financial sanctions and loss of a positive image in the market as a bona fide taxpayer. The tax policy at the enterprise should be carried out at certain stages, it should contribute to the achievement of the optimal amount of tax liabilities accrued by the enterprise and be based on the differentiation of available activities. The process of tax planning in the enterprise should be carried out constantly with the involvement of qualified personnel in order to achieve the optimal amount of accrued mandatory payments and reduce tax risks and their consequences.

An important factor in improving the efficiency of business entities is a quality audit of the payment of mandatory payments and fees to budgets, which will reduce tax risks and increase payment discipline in the enterprise.

In modern conditions, the legislation in the field of accounting and taxation is constantly improving, which affects the amount of tax liabilities of taxpayers. At the same time, the tax regulatory framework is characterized by a number of omissions and shortcomings, the presence of provisions that can be interpreted ambiguously, and a complex mechanism for collecting certain taxes, which contributes to the diversion of financial resources of businesses from circulation. The above negative factors have a detrimental effect on the activities of business structures and tax authorities, which is reflected in reduced profitability and losses in budget revenues. This creates the need to develop new ways of coverage in the accounting of tax liabilities, calculation methods, tools of fiscal rationalization using the services of audit firms.



In the last few years, VAT has played an important role in filling the state budget, at the expense of which more than 30% of revenues are generated. This tax is levied by the inclusion in the price of goods or services of enterprises and although it is actually paid by end consumers, the transfer to the budget is made by an entity that acts as a tax agent. However, this tax requires the payment of advance payments and thus exerts significant tax pressure on the activities of the enterprise, and the key problem of the accountant is its proper coverage in accounting, reporting and primary documents. VAT accounting is characterized by high complexity, which is associated with determining the amount to be paid to the budget (liabilities less credit), as revenues are calculated according to two approaches. The complexity of such a calculation contributes to the violation of tax legislation and incurring losses due to violations of regulations by both parties – payers and fiscal authorities.

The accounting and reporting system is the main source of data on the functioning of the taxpayer, as it covers information about assets, equity, liabilities, financial results and cash flows. Therefore, in order to monitor the activities in the field of taxes in the enterprise, it is advisable to form an audit department, which will control the accrual and payment of mandatory payments to the budget. The key tasks of such a department are control over the payment discipline of the enterprise, calculation of tax liabilities, payment of taxes to the budget, legal use of tax preferences, avoidance of losses due to tax risks, etc.

An effective system of internal audit of mandatory payments to the budget is the main factor in achieving rationalization in the field of taxation of the business structure, the essence of which is defined as minimizing tax payments to the budget and ensuring optimal fiscal pressure on the company if tax risks are within acceptable limits. Carrying out tax optimization of paid taxes should not violate the current rules of tax legislation and avoid shady activities that in the future will lead to the application of financial sanctions.

In Fig. 3. the scheme of formation of an effective model of taxation of the business entity is given.

The development of an effective strategy to improve the audit of mandatory payments to the budget in the national economy should be carried out taking into account: specifically defined functions and tasks of private auditors by recognizing their findings by public authorities and developing an algorithm for taxpayers in response to audit procedures; increasing the responsibility of private controllers for fictitious conclusions indicating specific types of penalties for both parties (taxpayer

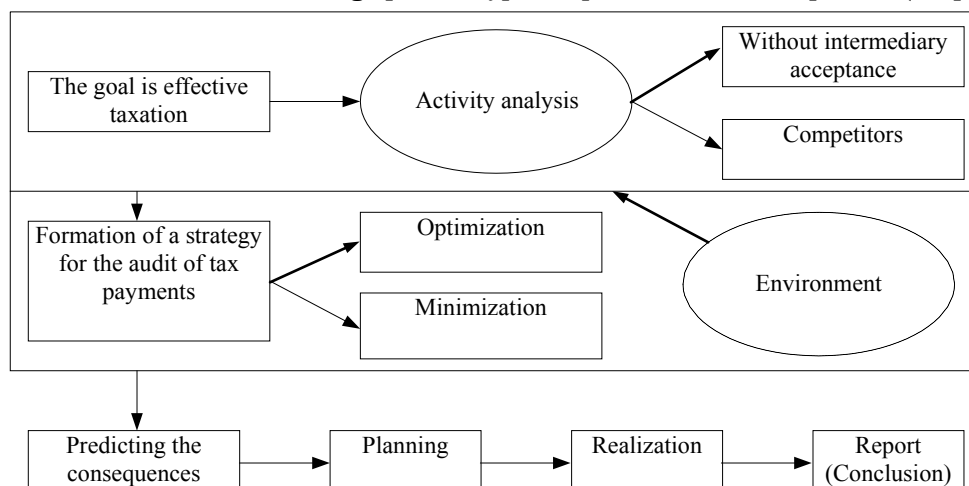


Fig. 3. Structural and logical scheme of increasing the efficiency of taxation at the enterprise  
Source: built by the authors on the basis [8, p. 187].

and auditor) for dishonest and fraudulent work in the field of taxation; introduction of compulsory insurance for persons carrying out control actions; to build a system of control over the functioning of private audit companies.

The use of methods of rationalization of the structure of taxes and fees should be carried out taking into account the principles of scientific substantiation and documentation. Judicial practice shows that the main reason for winning the lion's share of cases by the State Tax Service in Ukraine is the conduct of economic activity by taxpayers in conditions of pre-determined loss or lack of financial results in various forms, which are the main purpose of any business entity. All total cash spent or assets invested must be spent for profit generation. Losses from business transactions should be explained by subjective factors, the occurrence of adverse circumstances, ineffective management decisions, and so on.

Reducing the level of risks in the field of corporate taxation will contribute to an effectively organized system of tax audit, which will work in a coordinated manner and help minimize accrued taxes and fees, comply with tax laws, keep proper accounting and financial reporting and implement effective tax policy in general.

In the context of Ukraine's economic recovery, the tax system is characterized by high tax risks, which generate such factors as corruption, withdrawal of capital to offshore jurisdictions, unjustified tax benefits, omissions in regulations, use of various schemes to evade taxes, fictitious business structures, etc. These factors contribute to the violation of the financial security of the country, as they are accompanied by significant losses in revenues of the budget system and jeopardize the timely and full implementation of the state's powers. The increase in the frequency of these negative phenomena in the tax system will have a detrimental effect on the activities of the state and enterprises, so it is important to build an effective system of compliance to strengthen the financial security of the national economy.

In the domestic sphere of business structures, compliance is usually considered as a defining component of financial management, which covers a significant number of incentives from its introduction and implementation in practice. In addition, the construction of the compliance system allows to significantly reduce the losses from violations of tax legislation by both enterprises and the state, ie the effect of its introduction significantly exceeds the cost of its formation, as it allows forecasting tax risks. In the Ukrainian economy, this system has become widespread in the financial and credit sphere (banking), which stimulates its implementation in other parts of the financial system and in the mechanism of making mandatory payments in particular.

In 2019, the SFSU took initial steps to build a Compliance Strategy, the main task of which is to create the preconditions for conscious compliance with regulations in the field of taxation. This concept defines tax compliance as a set of motives and incentives for businesses and individuals that will encourage them to follow the rules of tax law and voluntarily pay all mandatory payments and fees to budgets and extrabudgetary funds. Compliance strategy is developed with the support of the European Union in the field of public financial management in the national economy.

The developed strategy will help change the awareness of taxpayers about the taxation process, increase the level of tax culture in the country and create the conditions for reducing the risks of non-compliance by business entities and citizens with tax legislation. The new concept provides for the construction of new partnerships between fiscal authorities and enterprises, assistance to the latter in the correct understanding of regulations in the field of taxation in order to avoid common mistakes, significantly simplify and facilitate the formation and submission of tax returns and more. Building a system of tax compliance also involves studying the experience of developed countries in this area and bringing domestic tax legislation in line with international standards through the formation of effective tax policy within the country.

The key parameter of compliance in the tax sphere is the identification and analysis of the risks of violation of tax legislation. In order to reduce tax risks at the initial stage, the probability of their occurrence is assessed taking into account internal

and external factors of influence. The first are related to the formation of labor resources, improvement of information support, development of new markets for innovative products, etc. External factors relate to the improvement of regulations in the field of taxation.

The formation of an effective system of tax compliance is also designed to strengthen the financial security of the country, which is largely characterized by tax security, ie the receipt of taxes and fees in the budgets in the projected amount and create the conditions for its growth.

The construction of such a system at the enterprise aims to help solve the following main tasks: compliance with tax laws, instructions of public services, potential owners and contractors; avoiding problems in relations with the tax authorities and preventing the imposition of various fines; creating a positive reputation in the market and growing the image of fiscal services, etc. Its ultimate goal is to reduce all kinds of losses and damages that are the result of non-compliance with tax laws and shadow activities, which will be the basis for increasing the level of economic security of the enterprise.

The experience of the world's leading countries shows that compliance in the tax sphere has become widely used. France has introduced tax monitoring, which covers large business structures with its tools, developed tax incentives for small businesses, strengthened control over the correctness of accrual of obligatory payments by related parties, and intensified assistance to firms operating internationally in paying taxes and fees.

The construction of a tax compliance system at the enterprise aims to cover the functions of internal control over the accrual and payment of mandatory payments and financial risk management in the field of taxation to achieve the overall result of significantly reducing risks in this sector and strengthening economic security. Developing a compliance strategy for taxes and fees will help minimize the tax risks associated with misinterpretation of regulations, simplification of reporting forms and reflection of accrued payments, and so on. This will help avoid such errors in future periods. Enterprises need to form their own sequence of steps to build tax compliance, which will take into account the specifics of its activities and help increase the efficiency of such a system. It should be part of the overall financial management system of the business structure, which will prevent the emergence of internal and external risks in the field of taxation and help to avoid significant losses due to non-compliance with various types of regulations.

**Conclusions.** The management of tax risks and the development of tax policy of the state is designed to form a strong protection for national businesses from the possible occurrence of risks in the tax sphere. However, in the domestic tax system, the key function of mandatory payments is fiscal, the economic meaning of which is to generate budget revenues at various levels. All regulations in the field of corporate taxation, which are accompanied by strict control by fiscal authorities, are focused on this task. The main reason for this situation is the ever-increasing state budget deficit. The fiscal orientation of the domestic tax system contributes to increasing the level of tax risks in enterprises and the state. The main problem of modern Ukrainian enterprises in the field of tax risk management is to outline ways to identify them, methods of analysis and identification of areas of reduction.

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**Данилків Х. П., Дропа Я. Б., Замасло О. Т., Макаренко У. Б. Податкові ризики підприємства в умовах глобалізації.**

Розкрито сутність податкових ризиків підприємства з погляду держави та платників податків, оскільки вони переслідують протилежні цілі в процесі розподілу валового внутрішнього продукту; охарактеризовано види збитків, які вони отримують у разі настання визначених податкових ризиків. Зазначено, що податкові ризики підприємства доцільно аналізувати в розрізі економічної, правової та суспільної площини, в яких будуть проявлятися негативні результати виникнення їх. Визначено зовнішні і внутрішні чинники податкового ризику суб'єктів господарювання, які формують невизначеність та є причиною виникнення конфліктів між суб'єктами системи оподаткування; охарактеризовано напрями впливу податкових ризиків на фінансово-економічну безпеку підприємства. Обґрунтовано, що мінімізувати дію таких ризиків можна за допомогою реалізації результативної податкової політики та застосування дієвих методів управління податковими ризиками. Подано складові елементи механізму нейтралізації податкових ризиків підприємства. Висвітлено значення податкової культури у формуванні високого рівня фінансової безпеки суб'єктів господарювання та роль уряду в забезпеченні її високого рівня серед платників податків. Подано алгоритм реалізації процесу управління податковими ризиками на вітчизняних підприємствах і підходи до аналізу ймовірності виникнення їх. Охарактеризовано сутність податкового планування на підприємстві як головного легального способу мінімізації обов'язкових платежів до бюджетів і зниження появи податкових ризиків. Аргументовано доцільність проведення якісного аудиту сплати податків і зборів підприємством до бюджетів різних рівнів, який дасть змогу знизити податкові ризики, підвищити платіжну дисципліну та сформувати оптимальне податкове навантаження на компанію. Використання методів оптимізації структури податків і зборів слід проводити з огляду на принципи наукового обґрунтування та документального відображення. Обґрунтовано потребу у формуванні ефективної системи податкового комплаєнсу, покликану зміцнити фінансову безпеку країни, яку значною мірою визначає податкова безпека. Зазначено, що така система дасть змогу запобігти виникненню конфліктів між підприємствами та державою у сфері оподаткування та допоможе уникнути значних втрат з обох сторін.

Ключові слова: податкові ризики, податкова безпека, податкове планування, податкова оптимізація, податковий аудит, податковий комплаєнс, платники податків, підприємство.

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