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## **TAX OPTIMISATION IN THE TAX RISK MANAGEMENT PROCESS. TAX-LEGAL ANALYSIS AND SELECTED MANAGERIAL ISSUES**

## ABSTRACT

The aim of the article is to theoretically present ways of legally optimising the taxation of entrepreneurs' income, by using the appropriate construction of legal regulations and legal and organisational forms of business. The issues of tax risk in the context of tax management are also presented. The goal of management is to reduce economic risk and to protect against its consequences. The volatility and complexity of tax laws, human errors, and the profligate attitude of officials make it difficult in practice to avoid financial risks associated with the application of tax law (sanctions, penal interest), and sometimes criminal liability (under the provisions of the Fiscal Penal Code or the Law on Liability of Collective Entities).

## STRESZCZENIE

Celem artykułu jest teoretyczne przedstawienie sposobów legalnej optymalizacji opodatkowania dochodów przedsiębiorców, poprzez wykorzystanie odpowiedniej konstrukcji przepisów prawnych oraz form prawno-organizacyjnych prowadzonej działalności. Przedstawiono także zagadnienia ryzyka podatkowego w kontekście zarządzania podatkami. Celem kadry zarządzającej jest ograniczenie ryzyka gospodarczego oraz zabezpieczenie się przed jego skutkami. Zmienność i złożoność przepisów podatkowych, błędy ludzkie, profiskalne podejście urzędników sprawiają, że w praktyce trudno jest uniknąć ryzyka finansowego związanego ze stosowaniem prawa podatkowego (sankcje, odsetki karne), a czasami odpowiedzialności karnej (na gruncie przepisów kodeksu karnego skarbowego czy ustawy o odpowiedzialności podmiotów zbiorowych).

**KEYWORDS:** *economics of taxation, risk management, financial risk, criminal fiscal code, economic rationality, tax management, tax law, legal and organisational forms*

**SŁOWA KLUCZOWE:** *ekonomia opodatkowania, zarządzanie ryzykiem, ryzyko finansowe, kodeks karny skarbowy, racjonalność ekonomiczna, zarządzanie podatkami, prawo podatkowe, formy organizacyjno-prawne*

## INTRODUCTION

Making rational decisions in an enterprise, both of a current and strategic nature, requires knowledge of and consideration for the external conditions of its operations. The accuracy of decisions taken, as well as the ability to adapt to a changing external environment, determines not only the effectiveness of a company's operations, but also its ability to continue operating (Szejniuk, 2018). In a correct enterprise environment, feedback significantly consists of adjusting the response to the information received regarding the effects of the activity (Wołowicz, 2017). In the behaviour of enterprises, the effectiveness of feedback as a method of modifying behaviour in order to increase the effectiveness and efficiency of actions taken, depends on the fulfilment of the basic conditions: accuracy (objectivity) of information, immediacy – if feedback occurs immediately after the event, its recipient easily realises the relationship between attitude and result, and completeness – consisting in the ability to take into account all major impacts. The existence of an enterprise in the long term depends on actions that adapt it to the changing environment. Adaptive actions taking place both within the enterprise and in all its interactions with the environment can also be forced by the fiscal nature of the economy (Stępień, 2015).

## REASERCH METHODOLOGY

Research in the social sciences, is inspired by numerous and diverse needs. Therefore, we will reduce the existing needs to two main types, to which certain types of research correspond. The first is combined with needs of a theoretical or cognitive nature, that is, it includes all those needs that are associated with the development of a particular science. The second is combined with the various needs of practice.

Legal and administrative sciences, as well as management and quality sciences, use typical methods found in the social sciences and humanities, i.e.: the study of documents (legal acts and judgments of administrative courts), comparative methods (expert opinions, legal opinions, analyses resulting from

linguistic, grammatical and historical interpretation) and case studies. The result of cognitive research is new assertions or theories.

Induction was used as the main research method. It involves drawing general conclusions or establishing regularities on the basis of analysis of empirically established phenomena and processes. It is a type of inference based on details about the general properties of a phenomenon or object. The use of this method requires the assumption that only facts can form the basis of scientific inference. These facts are real-life situations (economic and legal). Inductive methods include various types of legal acts, analyses, expert reports and scientific documents used in social research.

## **THE TAX SYSTEM AS AN ELEMENT OF THE EXTERNAL BUSINESS ENVIRONMENT**

The tax system significantly influences the material and legal situation of households (through the level and nature of the fiscal burden and the structure of taxation) and business entities (being a cost element for companies and their owners). Managers of economic entities must take tax regulations into account in their decision-making processes. Bearing in mind that in a market economy the profit motive is an essential premise for economic development, the tax legislator must be aware that only a certain proportion of the gross national product can be (is) taken over by taxes without causing negative financial and economic consequences. The creators of the tax system should therefore take into account the fact that every tax burden is treated by the subject as a diminution of his present or future wealth. If the tax system is characterised by high tax rates, the following effects are to be expected: weakening of the economic growth rate, development of the 'grey' economy, outflow of capital abroad while limiting the inflow of capital from outside. Legal regulations creating a framework for the operation of economic entities and the taxation of household income and capital have a significant impact on market power, consumer and investment spending, business development and economic growth (Sokołowski, 1995).

Taxes can also reduce the number of jobs in the economy, affecting both labour supply and demand. On the one hand, personal income tax, social

security contributions, or value-added tax reduce the benefits that workers can derive from employment. If taxes are increased, the threshold wage, i.e. the minimum amount of wages before they are paid for which people are willing to work, may increase (the number of people willing to work may be further reduced if part of the tax revenue raised is used by the state to finance higher social benefits, allowing people to earn an income without working). Workers, in order to maintain their after-tax income level, seek to pass on some of the tax to employers. The extent to which these costs are passed on is greater the less flexible the labour market is, as the bargaining power of employees vis-à-vis employers is then greater (Wołowiec, 2017a). On the other hand, what is important for an entrepreneur when calculating the profitability of hiring an additional employee is not the wage expenses charged to employees, but the total labour costs. The profitability of investments can be reduced not only by taxing corporate profits or investors' income. It is also reduced by taxing the income of the employees who find employment as a result of the investment, if they manage to shift at least part of the burden to the companies. Finally, it is also reduced by taxing consumer spending if companies are unable to raise the prices of their products by the equivalent of the tax. Both higher labour costs, which are not accompanied by a corresponding increase in labour productivity, and the payment of goods and services tax, which is not fully included in the price, reduce firms' revenues and thus their ability and willingness to invest (Rzońca, 2008).

Three elementary economic effects of taxation can be distinguished in relation to businesses: liquidity, property and organisational effects. Personal and corporate income taxes primarily have a negative impact on business liquidity, as they lead to a definite burden on the entrepreneur (taxpayer). Both personal and corporate income taxes have the character of non-deductible 'expenses', reducing the liquidity of the enterprise. The liquidity of the business is already affected by the very way in which the tax base is determined. If tax revenue from a business is receivable, even though it has not been received, and payments received for supplies of goods and services to be made in subsequent tax years do not constitute tax revenue in the year in which they are received. This means that, as a rule, revenue and expenses are determined on an accrual basis. The creation of a receivable from, for example, an instalment

sale leads to revenue on the date of the invoice, but no later than on the last day of the month in which the goods were issued. The arising of revenue due leads to a tax liability, usually in the form of advance payments during the tax year, even though the taxpayer has not actually received payment (cash). With regard to, *inter alia*, revenue from interest, exchange rate differences determined in accordance with the tax principles, as well as damages and contractual penalties, the legislator usually applies the cash rule for the emergence of revenue (Wołowiec, 2017b). This means that revenue, as well as the obligation to pay tax, arises at the time the cash is received. Also, income tax refunds do not lead to an improvement in liquidity, as the tax refund (receipt) is preceded by too much tax liquidity (expenditure), causing a negative liquidity effect. A company's liquidity is also affected by the way bad debts are tax deductible. If these receivables are tax deductible only upon receipt of a confirmation (decision, decision) of non-recoverability issued by an enforcement authority, or a court decision dismissing a bankruptcy petition or discontinuing bankruptcy proceedings involving the liquidation of assets. Given that the very process of documenting uncollectibility may take several months, this may generate a negative interest effect, resulting from the length of the period between the date of payment of tax on revenue due and the date on which the receivable is included in tax costs and the amount of tax burden is reduced. Also, the debt recovery process itself results in additional (non-tax) payments (litigation, enforcement and other expenses) (Kudert, Jamróży, 2007, Hundsdorfer, Jamróży, 1999).

On the other hand, an entrepreneur has 'at his disposal' depreciation write-offs, i.e. tax expenses that decrease the tax base, but do not have the character of a tax expense. Taxpayers may make depreciation write-offs on tangible and intangible assets according to depreciation methods and rates permitted by the legislator. Deferral of tax payments is possible through: use of the declining balance method, one-off depreciation, increasing depreciation rates, setting individual depreciation rates and choosing the method of valuation of homogeneous, tangible current assets (FIFO, LIFO, weighted average). Provisions and write-downs are also treated as a non-expendable tax expense in many legislations.

The amount of tax expenses is also affected by the actions taken in the way certain balance sheet events are recognised. Shifting or increasing tax expenses

occurs as part of the taxpayer's ability to exercise rights of choice or discretion, such as in the choice of depreciation method for fixed assets. The taxpayer may also have a certain degree of discretion in determining, for example, the cost of a fixed asset depending on the costing method applied (adopted). Liquidity in the area of income taxation is also affected by restructuring measures in a company. The sale of a business generates the disclosure of silent reserves contained in the assets of the business being sold and a positive increase in goodwill, which translates into taxation of the income arising from the sale of the business. Taxation of silent reserves can be a limiting factor in this type of transaction (asset deal). Taxation at the date of disposal of the business can be avoided by making a cash contribution to the business, thereby deferring taxation until the disposal of the shares acquired in exchange for the contribution in kind (Cienkowski, Wołowicz, 2014).

## **TAX PLANNING**

Planning can be defined in two ways. In a broader sense, tax planning is the consideration of tax implications in business planning. Tax planning can relate to a particular undertaking or be part of the ongoing monitoring of a company's day-to-day operations. Taxes are a component of many elements of the financial plan, such as revenue, costs (operating, financial, etc.) or depreciation, and therefore the proper recognition of the tax consequences of the activities undertaken is important for the financial result. In tax consultancy practice, special methods are also used to measure the tax burden, on the basis of which, among other things, the so-called effective tax rate is calculated. Tax planning does not only cover issues related to the amount of tax. It should take into account various elements, such as liquidity. The choice of longer settlement periods or the payment of advance payments (e.g. quarterly) allows for the establishment of longer payment periods for contractors and provides a competitive advantage not only in the tax area. It should be borne in mind that the positive effects resulting from tax planning and the favourable arrangement of tax settlements do not only have an effect in the tax or, more broadly, financial sphere. They can have a significant impact on

the competitiveness of a given entrepreneur, if only by reducing the costs of financing the business, the risk of non-payment and in many other aspects of the business. Due to the complexity and volatility of tax regulations, proper identification of tax consequences is not always a simple task, e.g. the rules on VAT refunds for start-ups are relatively complex and some issues are interpreted differently (e.g. the right to a refund prior to registration). Proper identification of refund periods and amounts will allow effective planning of cash flow and the final cost of the investment. A tax audit, used at the very beginning of the planning process, can be a helpful instrument in tax planning. The audit should be carried out by an external advisor. If we have a regular adviser running our accounts, it is worth considering having another external adviser carry out the audit. The audit involves a comprehensive examination of the correctness of the tax accounts. In this sense, it is a very good tool for determining the situation of a given taxpayer, which is the starting point for planning. Planning, including tax planning, is often practised incidentally by taxpayers. For larger transactions, planning only sections of the business, without detailed knowledge of the business as a whole, can be counterproductive. Effective planning is not only limited to the designation of certain activities, the introduction of behavioural models or the achievement of an optimisation effect or risk reduction, it should be a continuous process carried out taking into account the economic situation, development plans and, above all, changes in tax legislation.

Tax planning in the narrow, classic sense consists of managing asset interests in such a way as to take advantage of legally permissible opportunities to minimise the tax burden (tax planning/structuring). A key factor in planning is knowledge of the tax laws. If planning is aimed at minimising the tax burden (optimisation), knowledge of the relationship between economic events and tax laws becomes even more important. An informed taxpayer-manager should be familiar with the fundamental possibilities for shaping the tax burden or the timing of tax payments and use them in practice as much as possible to achieve the objectives of companies and their owners (Kudert, Jamroży 2007). Typical issues considered in tax planning include tax loss management, liquidity management, taxation of restructuring events or conversions, mergers, divisions and contributions in kind in commercial



companies. Issues covered by international tax planning include, in particular, the taxation of dividends, interest, royalties, treaty shopping, hybridisation of subjectivity for tax purposes, methods to eliminate double taxation or tax management through holding. An important concept in the field of international tax planning is the notion of a 'tax haven' called – depending on who is making this definition – either a 'lax tax regime country' or a 'harmful tax competition' country. A tax haven is usually a territory where certain activities or sources of income are exempt from income tax or taxed at an extremely low level (Wiśniewski, 2009).

## TAX RISK

Tax risk is a specific type of business risk that relates to the following aspects:

- expenses related to the unforeseen emergence of a tax liability or the an increase in tax liability,
- occurrence of sanctions related to incorrect application of tax regulations, including: interest on tax arrears, sanctions adjudicated on the basis of specific tax acts (e.g. Article 111(2) of the VAT Act), penalties provided for in the Fiscal Penal Code, penalties provided for in other acts (the Act on Liability of Collective Entities for Acts Prohibited by Penalty, the Accounting Act), and other sanctions resulting from separate regulations or business customs (e.g. the existence of a tax arrears or a criminal record may be an obstacle to obtaining a loan or a public contract),
- expenses not resulting directly from the tax or fiscal law, including: shortening of the period or amount of trade credit, change in the bank rating of a given entrepreneur resulting in the reduction of credit lines or their closure, change in the interest rate, change in the method and level of security.

In general, we can consider that tax risk is the lack of certainty as to the tax consequences/consequences, both with regard to economic events that have already occurred and those that will occur in the future. The concept

of risk is not limited to negative tax consequences consisting of an increase in the tax burden, it also includes the situation in which tax consequences occur, for example, in a different accounting period than anticipated by the taxpayer. It is accepted that managing risk is more important than managing flows or achieving a certain level of effective tax rate. When considering risk from the subjective side, we can assume that it concerns (Wołowiec, 2016):

- the entrepreneur as a taxpayer, as a payer (e.g. as an employer or withholding tax), and as an entity responsible for the breach of specific provisions, e.g. the Act on Liability of Collective Entities for Criminal Acts,
- manager with respect to criminal and fiscal liability.

We can divide the sources of tax risk into two types: internal and external. Internal sources include:

- sources concerning resources, insufficient knowledge of employees, errors in IT systems or lack of adequate systems, and failure to use tax advice,
- sources concerning organisation and procedures: unclear or undefined division of tasks between employees (departments), and lack of internal tax procedures.
- sources concerning communication: limited influence of the financial department on transaction planning and contract design, lack of exchange of information and documents between employees (departments), and lack of cooperation between the tax advisor (tax department) and the legal advisor (legal department).

External sources include:

- in the area of law making: high volatility of tax legislation, complexity and vagueness of tax legislation, loopholes in legislation, inadequate implementation of EU directives in domestic tax legislation, and changes in legislation in related areas (accounting, construction law),
- in the area of law application: divergence in case law of tax and tax authorities, including divergence in case law on official interpretations (although divergence in official interpretations has been decreasing recently), changing trends in case law on official interpretations, pro-fiscal

approach of tax and tax authorities, divergence in case law of administrative courts, divergence between case law of tax and tax authorities and court case law court rulings, the failure of tax and revenue authorities (and to a lesser extent courts) to take into account the principle of direct application of EU directives, the application by authorities and courts of the judicial concept of tax law circumvention (despite the absence of a circumvention clause in the legislation), and the lack of case law following amendments to the legislation (Łukaszewicz-Obierska, Ziobrowski, Jedruszek, 2013).

The multiplicity, diversity and interplay of sources of tax risk means that it is impossible for an entrepreneur to completely eliminate the tax risks built into the activities he carries out. However, having no influence on external factors, it should take all possible measures to counteract its internal sources. A particular role in this area should be played by the organisation's general tax awareness, built up through internal and external tax resources (i.e. the person in charge of tax in the company together with tax advisors). The role of the aforementioned resources is to develop a tax risk management policy for the company taking into account a number of risks identified in the previous section, resulting in a higher tax awareness of the organisation. Developing and putting into practice a tax risk management policy also allows for active management of the tax position. Undertaking optimisation measures only seemingly increases the overall tax risk in an entrepreneur. Since optimisation is the result of structured tax planning, with which comes a deepening of knowledge of tax laws, the entrepreneur, by planning for tax optimisation, in effect increases his or her potential to anticipate the tax consequences concerning his or her business activities. Tax risk management should be part of the rational and effective tax management of the business and the business itself (Tran-Nam, Evans, Walpole, Ritchie, 2000).

## CONCLUSIONS

Income taxes also have a negative impact on the assets (equity) of entrepreneurs. The reduction in wealth results from the burdening of entrepreneurs with both wealth taxes and corporate income tax in the case of capital companies and, in the case of partnerships, with personal income tax for distributions made to partners.

The organisational effects of taxation can be considered on two levels. Firstly, entrepreneurs must take organisational measures to ensure that their tax obligations are met in a timely manner. These relate both to activities related to their own tax obligations (e.g. bookkeeping, preparation of tax returns or statements, provision of tax information), but also to the performance of payer functions related to the payment of withholding taxes. Secondly, it must be taken into account that business decisions of entrepreneurs have certain tax consequences. Therefore, taxes have to be taken into account in the management process and, therefore, appropriate organisational conditions have to be created for this purpose as well. The organisational problem can essentially be solved in two ways:

- by the entrepreneur setting up an in-house tax department or;
- by using an external tax advisor (tax outsourcing).

The two solutions are not mutually exclusive, as they can be combined. Of course, the choice of one or the other is determined by a cost-benefit analysis. Particularly in small and medium-sized enterprises, it is not worthwhile to maintain their own accounting and tax departments, as the organisation and maintenance costs are often higher than the remuneration paid to an external service provider. In the case of accounting and tax outsourcing, the main motives for taking such action are usually cost reduction and access to specialist knowledge. By cost reduction, we can mean not only physically lower expenses (usually the use of an accounting office costs less than hiring full-time specialists), but also the reduction of costs of applying tax law. This is because the uncertainty experienced by the entrepreneur is significantly reduced, and the need to control and interpret the law on one's own is completely eliminated (Kępa, 2018).

The company's tax risk is also reduced. Tax risk can generally be understood as the risk of a dispute with the tax authorities. Depending on the attitude of the company in question, this risk can be a pure risk or a speculative risk. Pure risk carries only the possibility of loss, whereas speculative risk also provides for the possibility of gain. Moreover, speculative risk is most often the result of a conscious decision – it is incurred in order to gain, and the greater the risk, the greater the potential gain as well. Thus, the deliberate breaking of the law or evasion of the law by a company means that speculative risk is incurred. Pure risk, on the other hand, refers to coming into conflict with the tax authorities when:

- the company's action was unlawful, but the unlawfulness was unintentional (mistake, ignorance, etc.),
- the company's action was lawful (this is usually only established by a court, or possibly by a higher tax authority), but was not recognised as such by the tax authorities,
- the company's action was legal and was recognised as such for some time by the tax authorities, but later they changed their position and a conflict arose (Stępień, 2015).

Both of these risks describe a potential reality, i.e. the possibility of coming into conflict with the tax authorities. Their realisation is random, with the so-called double randomness – both the timing of the event (conflict) and its depth, i.e. the consequences, are unknown. These effects are mainly financial (arrears incurred, financial sanctions, etc.), although loss of credibility, for example, may also be involved. Importantly, both risks are linked to uncertainty, but each with a different one. Speculative risk is linked to the uncertainty of whether an illegal act will come to light. Pure risk, on the other hand, with the uncertainty inherent, as it were, in the tax system (Evans, Ritchie, Tran-Nam, Walpole, 1997).

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