



ARTUR GRZESIAK

WSEI University in Lublin, Poland

ORCID iD: orcid.org/0000-0002-4049-9008

PIOTR WASZAK

WSEI University in Lublin, Poland

ORCID iD: orcid.org/0009-0001-7661-8478

PIOTR ZIENTARSKI

WSCE University of Applied Sciences
in Józefów, Poland

ORCID iD: orcid.org/0000-0002-7157-8446

TOMASZ WOŁOWIEC

WSEI University in Lublin, Poland

ORCID iD: orcid.org/0000-0002-7688-4231

TADEUSZ MĘDZEŁOWSKI

Graduate School of Business - National-
Louis University, Poland

ORCID iD: orcid.org/0000-0003-1318-6601

LEGAL CONDITIONS FOR THE IMPOSITION OF INCOME TAXES

UWARUNKOWANIA PRAWNE NAKŁADANIA PODATKÓW DOCHODOWYCH

ABSTRACT

Withholding tax collection has an undoubted advantage in that the tax is paid shortly after the income has been made available to the taxpayer (paid by the payer). Withholding tax can be treated as a kind of advance payment of income tax. With this method, the taxpayer is obliged to declare the amount of income earned in the annual tax return and has the right to reduce (reduce) the amount of tax due resulting from this tax return by the amount of withholding tax. We refer to tax collected at source as „creditable withholding tax”. Alternatively, the withholding tax collected at source may be the final withholding tax. In such a case, the recipient of the income (taxpayer) is released from the obligation to submit a tax return and from the obligation with respect to the amount of tax withheld. Withholding taxes are usually levied at a fixed rate that is applied to revenue (not income), which means that no tax-deductible costs or the taxpayer’s personal situation (earning capacity) are taken into account. Therefore, it can be concluded that taxes collected at source are cedular taxes.

STRESZCZENIE

Pobór podatku u źródła ma niewątpliwą zaletę, polegającą na tym, iż płatność podatku następuje w niedługim czasie po tym, jak dochód został podatnikowi oddany do dyspozycji (wyłacony przez płatnika). Podatek pobrany u źródła można traktować, jako swoistego rodzaju zaliczka na poczet podatku dochodowego. Przy tej metodzie podatnik jest zobligowany do zadeklarowania w zeznaniu rocznym wielkości osiągniętego dochodu, jak i ma prawo zmniejszać (redukować) kwotę należnego podatku wynikającego z tego zeznania o kwotę podatku pobranego u źródła. Podatek pobierany u źródła określamy mianem *podatku u źródła ulegającego zaliczeniu*. Alternatywnie podatek pobrany przez płatnika u źródła może być ostatecznym podatkiem pobranym u źródła. W takim przypadku odbiorca dochodu (podatnik) jest zwolniony z obowiązku składania deklaracji podatkowej oraz z zobowiązania w odniesieniu do kwoty pobranego podatku. Podatki pobierane u źródła nakłada się zazwyczaj według stałej stawki, która stosuje się od przychodu (nie od dochodu), co oznacza, iż nie bierze się pod uwagę żadnych kosztów uzyskania przychodu, ani sytuacji osobistej podatnika (zdolności dochodowej). Zatem można stwierdzić, iż podatki pobierane u źródła są podatkami typu cedularne.

KEYWORDS: *tax proceedings, administrative proceedings, Tax Ordinance, state support law, tax credits and exemptions, tax management, local development, state support management*

SŁOWA KLUCZOWE: *postępowanie podatkowe, postępowanie administracyjne, Ordynacja podatkowa, ustawa o pomocy publicznej, ulgi i zwolnienia podatkowe, zarządzanie podatkami, rozwój lokalny, zarządzanie pomocą publiczną*

INTRODUCTION

Assuming that in the international tax competition, the attractiveness of a particular tax system, and as a result – location of investment depends, among other things, on the level of corporate income tax rate, an alternative for lowering the tax rate is not to tax profits retained in a company (re-invested), where we tax only incomes of consumption nature (*getting out* of an enterprise). Another interesting solution may be a system of investment reliefs and exemptions (Graham, 2007). Apart from the level of effective tax rate, another essential factor may be the coherence of tax regulations and their compliance to accounting regulations (coherence of tax and balance law). International and Polish experience in using investment reliefs allow us to put forward a thesis concerning relatively low economic effectiveness of such reliefs. Costs measured by lost budget inflows are large, effects – moderate, while the greatest beneficiaries of this solution are tax advisors (Jourmard, 2002; Kesti, 2021). Tax reforms being an effect of the assessment of effectiveness of solutions applied so far and tax competition for capital, aim at lowering rates and simultaneously eliminating reliefs (Geaten, 2007). As a result of such changes, tax base is expanded (shadow economy decreases), which stabilizes budget tax incomes and sometimes (in the longer run) accounts for their growth (Cienkowski, Wołowiec, 2014; Wołowiec, Skica, Gercheva, 2014). Apart from unfavorable influence of reliefs and exemptions on budget incomes from tax, we can identify several other arguments in favor of eliminating various investment preferences from the corporate income tax system (Edwards, De Ruyg, 2002, Messere, 2000). For example, differentiation of tax rates is based on the premises related to creating investment incentives (Zhuravka, Filatova, Šuleř and Wołowiec, 2021). However, it makes the system complicated and does not have to bring the planned effect in form of stimulated investment demand, while generating all kinds of ineffectiveness (Chalk 2001). The subject literature distinguishes and assesses the effectiveness of the following tools used within the corporate income tax (Zee, Fletcher, 2002).

Table 1. *Instruments (preferences) used in the construction of corporate income tax]*

Type of instrument/ preference	Disadvantages	Advantages
Lowered rate	<ul style="list-style-type: none"> – large amounts of tax savings go to companies which, even if there was not a lower rate, could enter a given market. The lowered rate allows them to generate extraordinary profits. – allows use of transfer prices between companies with high and low rates, both in the country and between countries. 	<ul style="list-style-type: none"> – simple to administer. – possible transparent assessment of costs to the budget.
Tax holidays	<ul style="list-style-type: none"> – may attract short-term investment, – there is a tendency for prolonging the period of tax holidays by creative presentation of existing investment as new one, – they create unfair competition between new and old companies. – costs to the budget are less transparent (more difficult to assess) than in case of a lower income tax rate. 	<ul style="list-style-type: none"> – simple to administer. – limits contacts with tax (treasury) administration.
Investment allowances and tax credits	<ul style="list-style-type: none"> – favors capital (investment) goods with short life-span, if allowances are granted for specific good. – may provoke abuse related to selling and buying the same goods in order to enjoy tax benefits several times. – large administrative costs related to use and control of granted preferences. – discrimination of investment with long return period. 	<ul style="list-style-type: none"> – offer possibility of directing investment incentives on types of activities. – possible transparent assessment of costs to the budget.
Accelerated depreciation	<ul style="list-style-type: none"> – considerable administrative costs. 	<ul style="list-style-type: none"> – causes ‘re-qualifying’ of income tax into some kind of consumption task. – does not discriminate between long-term and short-term capital goods. – in its essence contains all benefits of investment allowances and tax credits.
Stability premiums	<ul style="list-style-type: none"> – difficult to implement (changeable political conditions), – administrative costs. 	<ul style="list-style-type: none"> – guarantees excluding a given investor or investment from potential future changes in tax system

Source: own elaboration

Summing up, we should be cautious when using investment stimulating tools. First of all, the use of general tools, although it is a simple and cheap solution, does not have to lead to the planned effect. Specific tools, on the other hand, are costly, may lead to abuse and cause ineffectiveness. The economic theory shows that most reliefs very often stimulate the taxpayers' behavior that is economically and socially irrational (investment) by supporting creation of the so-called tax shields (Wołowiec, 2017).

When discussing the concept of personal income tax, it should be noted that the literature classifies it in the category of direct and personal taxes. Thus, the type of taxes under discussion includes all income earned by the taxpayer. The exception in this case is the catalog of subject exemptions highlighted in Article 2 of the Law of July 26, 1991 on personal income tax, as well as income excluded from income taxation by the Minister of Finance by regulations issued for this purpose. Individuals employed on the basis of an employment contract or civil law contracts, as well as conducting business in the form of a sole proprietorship, civil partnership, general partnership, partnership or limited partnership (other types of companies, i.e. limited liability companies and joint stock companies, are subject to corporate income tax (CIT)), are therefore required to pay personal income tax. As already mentioned, the abbreviation for the type of tax in question derived from the English expression Personal Income Tax is PIT, associated by taxpayers with the return filed at the beginning of each year for the previous twelve months. Importantly, taxpayers pay income tax during the tax year in the form of so-called advance payments. In the case of employed persons, advance payments of income tax are made through the payer – in this case the workplace. Self-employed persons make advance payments on their own. In the case of pensioners, who are also required to settle personal income tax, the role of the payer is performed by the Social Insurance Institution (Wołowiec, Skica, 2013).

When discussing the concept of personal income tax, it is worth noting that the aforementioned exhibits the characteristics of state, direct, income, personal and universal from the point of view of subject and object. The personal income tax also has features described on the pages of the literature of the subject as permanent features of the tax. These are: compulsory, non-refundable, monetary nature, non-payment and generality (universality (Fuest, Huber, Nielsen, 2003).

This conclusion is even more interesting as this solution is widely used. The differentiation of rates results from the way of financing investment. A lower rate of corporate income tax (lower than the highest rate of personal income tax) is connected with investment from generated profit, which gives possibilities of generating additional financial resources, visible especially in large companies financing their activities in capital market. Even so, for small companies this factor is also important as increasing the ability to accumulate financial means by any company is always beneficial, especially in a situation when costs of attracting capital are high (Heady, Noord, 2001). In case of progressive personal income tax, used mostly by households, the above argumentation cannot be applied (Wołowiec, 2019).

SUBJECT AND OBJECT OF PERSONAL INCOME TAXATION

The discussion of personal income tax is worth supplementing with an explanation of issues related to the subject and object of this type of taxation. As already mentioned, the elements of the structure of the tax (regardless of the type), in addition to its fixed features, are the subject and object of the tax, the tax base and the tax rates and scales. In order to discuss in detail the personal income tax analyzed within the framework of this thesis, it seems reasonable to take apart the technical elements of the tax listed above. The first of the basic elements of the construction of personal income tax is the subject of taxation. The scope of the type of tax in question is relatively broad and includes all natural persons residing in the territory of the Republic of Poland (i.e., having a center of personal (life) and economic interests in the territory of the Polish state or residing there for more than 183 days per fiscal year). The aforementioned, referred to by law as taxpayers, are subject to tax liability on their total income, i.e. the sum of income earned from various sources. It is worth mentioning in this regard that the tax obligation also extends to persons who do not reside in Poland permanently. In this case, personal income taxation covers only a part of the total sum of their income – the part obtained as a result of work in the territory of the Republic of Poland (Wołowiec, Bogacki, 2021).

The second of the basic elements of the construction of personal income tax is its subject matter. The subject scope of the type of tax in question is as broad as the subject scope, and includes all income and revenue received by the taxpayer from various sources. According to Article 9 of the Personal Income Tax Act of July 26, 1991, the subject of the discussed type of tax is *all kinds of income, with the exception of income exempted from taxation and income on which collection of tax has been abandoned under the provisions of the Tax Ordinance (i.e., exempted from tax)*. Thus, the subject of income taxation on natural persons are factual and legal states, leading to income as a consequence of their actions. When discussing the subject of personal income taxation, it seems reasonable to present the definition and characteristics of the terms income and revenue. According to Article 9 of the Law of July 26, 1991 on personal income tax, the term income is defined as *the surplus of the sum of income from this source over the costs of obtaining it achieved in the tax year*. It is important at this point to emphasize that in a situation where the costs of obtaining income exceed the total value of such income, the resulting difference constitutes a loss from the source of income. The definition of income can therefore be presented in the form of the following scheme (formula): $REVENUE - COSTS \text{ (of obtaining revenue)} = INCOME \text{ (or loss)}$.

According to Article 9 of the Personal Income Tax Act of July 26, 1991, the term income is defined as *money and monetary values received or placed at the disposal of the taxpayer in the calendar year, as well as the value of benefits received in kind and other gratuitous benefits*. When defining the concept of income, it is also important to discuss the issue of deductible expenses. The above-mentioned term is defined in the literature as all costs incurred by an individual or business entity in order to achieve income from work or business, or to preserve/secure a source of income (Wołowiec, 2008).

It is important at this point to point out that all legal issues related to the subject scope of personal income tax have found their regulation in the Law of July 26, 1991 on personal income tax, as amended. The aforementioned legal document specifies the category of income (revenue), which, according to the provisions of the Act, is not subject to personal income taxation. Prominent among them are:

- income (revenue) derived from agricultural activities (exceptions include

- in this regard, income (income) derived from special divisions of agricultural production (cultivation in greenhouses or heated foil tunnels, cultivation of mushrooms and mycelium, cultivation of plants by *in vitro* methods, farm breeding and rearing of poultry, breeding and rearing of fur animals, breeding of earthworms and entomophages, breeding of silkworms and running of apiaries));
- revenues (income) derived from forest management;
- income (revenue) subject to inheritance and gift tax under the law;
- income (revenue) obtained from activities that are not the subject of a legally effective contract;
- income (revenue) obtained through the division of property between spouses (as a result of the cessation or limitation of marital community of property);
- income (revenue) subject to tonnage tax under the law;
- income (revenue) obtained by way of earned benefits to meet family needs, as referred to in Article 27 of the Family and Guardianship Code.

The Personal Income Tax Act of July 26, 1991, as amended, also specifies income (revenue) that is subject to personal income taxation under the law. Income earned on the territory of the Polish state subject to the type of taxation in question is considered to be:

- income (revenue) obtained through work performed in the territory of the Republic of Poland on the basis of a business relationship, employment relationship, contract work and cooperative employment relationship;
- income (revenue) obtained by way of activities performed personally in the territory of the Polish state;
- income (revenue) obtained by way of business activity conducted on the territory of the Polish state;
- income (revenue) obtained through the sale, lease or rental of real estate located on the territory of the Polish state.

Summarizing the consideration of the subject of personal income taxation, it is stated that the type of tax in question covers income and income obtained

from the following sources: employment relationship, employment relationship, personally performed activities (including artistic, scientific, journalistic or commissioned or contracted activities), non-agricultural economic activity, special divisions of agricultural production, real estate and monetary capitals and property rights. It should be emphasized at this point, that this tax applies to both financial benefits and benefits received in kind (Wołowiec, Bogacki, 2020).

TAX LIABILITY VS. TAX OBLIGATION

In making a consideration of tax liability and tax obligation, it is worth recalling the permanent features of a tax. These are: compulsory, non-refundable, monetary in nature, non-payment and generality (universality). The first of the mentioned features of the tax is closely related with the ability of a financial institution to use all kinds of coercive measures to enforce an individual's obligation to pay the tax. Accordingly, on the pages of Article 4 of the Tax Ordinance Act of August 29, 1997, it is defined that *a tax obligation is an unspecified obligation arising from tax laws to make a forced monetary payment in connection with the occurrence of an event specified in those laws*. At the same time, Article 5 of the aforementioned legal act defines the concept of tax liability as *the obligation of a taxpayer, arising from the tax obligation, to pay to the State Treasury, province, district or municipality a tax in the amount, at the time and in the place specified in the provisions of the tax law*.

It is important at this point to clarify the difference between the terms defined above. The concept of tax obligation is relatively general and, although it imposes a compulsion to pay tax, it does not refer to specific entities. Tax obligation, concretizes the tax obligation by identifying the entity obligated to pay the tax fee. It is therefore stated that the tax obligation is a primary category in relation to the tax liability and can transform into this obligation. Tax liability thus becomes a secondary category to tax obligation (Messere, 1998).

The literature indicates that personal income taxation covers all income earners. As already mentioned, the order to pay an appropriate fee on the income earned (income less by the costs of its acquisition) is referred to as a tax obligation. It is worth point out that the aforementioned can take the following two

forms: unlimited tax obligation (covering all income earned by the taxpayer, regardless of the location of its sources) and limited tax liability (covering only income earned in the territory of the Republic of Poland) (Wołowiec, Bogacki, 2021).

The emergence of tax liability is an important moment for the creation of a system for the emergence and assessment of tax liabilities. As already mentioned, the tax liability results directly from the emergence of the tax obligation and constitutes its concretization. The concretization of the tax obligation is related to the with the two-phase nature of the legal-tax relationship, in which the first a phase is related to the creation of a taxable state of affairs (the creation of the tax obligation), while the second is based on the transformation of powers and obligations created in the first phase of tax obligation creation. These modifications of powers and obligations arising from the tax obligation constitute a certain rule of behavior of taxpayers, i.e. tax liability.

Concluding the above considerations, it seems reasonable to mention the concept of expiration of tax obligation and tax liability. Tax obligation expires (ceases to be in force) at the time of cessation of the legal, actual existence of the tax subject (taxpayer) or at the time when the provisions imposing this obligation are repealed. Thus, the expiration of the tax obligation is not influenced either by the tax authorities or taxpayers. In the case of a tax obligation, the literature points to two ways of extinguishment – effective and ineffective. The former occurs in the situation of payment of tax, collection of tax by the payer, withholding of tax, crediting of overpayment or refund of tax, transfer of property or property rights and seizure of property or property rights as a result of enforcement proceedings. Extinction of ineffective tax liability occurs when the tax is remitted or barred by the statute of limitations, there is an abandonment of tax collection, as well as when the entity is released from the obligation to pay the tax (Hamakers, Holmes, Głuchowski, Kardach, Nykiel, 2006, p. 33).

Personal income tax is a tax liability directed to individuals employed under employment contracts or civil law contracts, as well as those conducting business in the form of sole proprietorship, civil partnership, general partnership, partnership or limited partnership. Employed persons remit advance income tax payments through the payer. Self-employed persons make advance payments on their own. The tax law provides them with the opportunity to take advantage of various forms of taxation for personal income tax. Tax is one

of the oldest economic categories introduced into the state financial system for the purpose of subsequent appropriation for the development of infrastructure and entities serving the state and its citizens. Thus, tax is a legal and economic institution, which, as an economic category, is tantamount to the seizure for the benefit of the state (or a public-law association) from entities subordinate to the state of a portion of their revenues, income and property. The body collecting the said financial benefits reserves the right to determine the purpose of use of the taxes collected. Nowadays, the pool of money created from the collected taxes, goes to the treasury of a particular district or municipality, province, and finally to the state treasury, to be finally allocated for the development of infrastructure, units serving the state and its citizens.

The literature on the subject distinguishes different types of taxes – revenue, income, turnover and property, as well as direct and indirect or central, local and joint. Income tax is considered one of the most important obligations of citizens to the state financial system. Income tax is classified as direct, which means in practice that the payer is charged with it directly and therefore has the obligation to pay the appropriate fee to the relevant tax authority. Personal income tax also has features described in the pages of the literature of the subject as permanent features of the tax. These are: compulsory, non-refundable, monetary in nature, non-payment and generality (universality). The scope of the type of tax in question is relatively broad and covers all natural persons residing in the territory of the Republic of Poland (i.e., having a center of personal (life) and economic interests in the territory of the Polish state or residing there for more than 183 days per fiscal year). The subject scope of the type of tax in question is as broad as the subject scope and includes all income and revenues earned by the taxpayer from various sources. Pursuant to Article 9 of the Law on Personal Income Tax of July 26, 1991, the type of tax in question is subject to all types of income, with the exception of income excluded from taxation.

CONCLUSIONS

Any modern, contemporary state, in order to fulfill the tasks entrusted to it socio-economic tasks, must be equipped with a specific, necessary instrumentarium for the effective realization of the assumed goals. In this context, the tax constitutes one of the important tools of this instrumentality used within the framework of the state's economic policy. It is a basic and one of the oldest economic, fiscal, legal, political and social. The realization of the basic function of taxes, i.e. the fiscal function, which boils down to the accumulation of monetary resources that enable the state to effectively achieve the goals it sets, has at the same time negative implications in the form of reduced income levels and reduced private spending on individual consumption, as well as on the level of production, investment and employment. Thus, through taxes, social and economic relations are shaped and economic relations between the state and taxpayers.

Influencing social and economic processes in the implementation of state fiscal policy has a very significant impact on the development and stimulation of entrepreneurship. A prerequisite for the use of this instrument of influence and stimulation of economic processes is its compliance with the principles of functioning of the market economy. In addition, the effectiveness of the tax as a tool of state policy in this regard must result from its degree of harmonization with other instruments used by the state. Not without significance here is the essence of the construction of the tax itself, as it determines how a given tax will fulfill the functions intentionally assigned to it by the public authority and contribute to achieving the intended objectives of state economic policy. Individual elements of the tax's construction, the manner of their appropriate and mutually inconsistent selection and the internal consistency of this construction determine the usefulness of the tax as an effective instrument of economic policy, positively influencing the behavior of entrepreneurs.

When analyzing the subjective side of any legal-tax relationship, the basic question we must ask is: who is a party to this relationship? We will distinguish between the active side of the legal-tax relationship – that is, the entity entitled to demand a certain behavior and, in the case of tax liabilities, entitled to demand the payment of tax – which is the tax authority, and the passive side (or, in other words, the debtor side) of the legal-tax relationship, that is,

such an entity to which tax norms of an imperative-attributive nature (i.e., *bilateral* norms) *impose* obligations to the extent that they *grant* rights to active parties. The main obligation of the passive party in the tax-legal relationship in question will therefore be the payment of tax. This party is the taxpayer as defined by the provisions of the Tax Ordinance. According to Article 7 § 1 of the Tax Ordinance, a taxpayer is a natural person, a legal person or an organizational unit without legal personality, subject to tax obligation under tax laws. The payer is obligated to calculate the tax, collect it and pay it on time to the appropriate account. This is an entity that we meet mainly in the collection of personal income tax, tax on civil law transactions and tax on inheritances and donations. In turn, the tax collector collects the amounts due and pays them to the appropriate account of the tax authority.

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