



---

## **STAGES OF FORMATION OF TAX ADMINISTRATION FOR LARGE TAXPAYERS IN UZBEKISTAN**

Muzaffarov Dilshod Shukhratovich

Independent Researcher

Tashkent State University of Economics

### **Abstract:**

This article analyzes the foreign experience of implementing the tax administration of large taxpayers, as a result of this analysis, issues of improving the tax legislation of the Republic of Uzbekistan, a proposal for further improvement of the tax administration of large taxpayers and recommendations are developed.

**Keywords:** tax, budget policy, budget, tax administration, large taxpayers, foreign experience, tax potential, tax burden, tax rate, tax benefits.

### **Introduction:**

The experience of dividing taxpayers into categories according to their various characteristics, applying separate tax regimes to them, taking into account their socio-economic status, is improving significantly in countries around the world. If we look at the main essence of such approaches, on the one hand, it is aimed at simplifying the state's financial policy through the effective use of state financial instruments in the activities of taxpayers, and on the other hand, it is aimed at achieving the effectiveness of the policy aimed at the convenient and maximum formation of state budget revenues, which is the main fiscal issue of any state. This requires identifying enterprises that fall into the category of large taxpayers, developing issues of optimal management of their activities through taxes.

### **Analysis and discussion of results**

One of the important priorities of tax policy in the conditions of the new Uzbekistan is the application of tax administration as a separate tax regime for relatively large enterprises, which are of great importance in our national economy, as well as in the formation of state budget revenues. Of course, there are a number of reasons for this.



## **International Conference on Modern Science and Scientific Studies**

Hosted online from Madrid, Spain

Website: [econfseries.com](http://econfseries.com)

20<sup>th</sup> April, 2025

First, the activities of business entities, their production capacity and contribution to the country's treasury are not the same, which indicates their deep economic differentiation. Although a unified approach to the principles of taxation applies to taxpayers, conducting tax policy (administration) in relation to the volume of taxpayers has been effective in world practice. Secondly, the production technology of enterprises with large capacity and the structural structure of their turnover of goods (services, work) are much more complex, taking them into account, it is useful to apply a separate tax regime to them. Thirdly, within any given national economy, economic policy is carried out by grouping enterprises according to their size, and their economic potential is assessed, and their fiscal potential is also determined. Assessing the fiscal potential of taxpayers requires analyzing them within separate groups and implementing appropriate tax policies. It follows that taxing taxpayers on a large scale requires separate tax administration in various directions.

Of course, tax policy, which begins with their inclusion in the category of large taxpayers, includes the approach of tax authorities to their accounting, registration of tax objects within them, granting tax benefits to them, and collecting tax debts, has a certain formation process. Indeed, although there have been few cases of tax administration based on specific approaches to taxation of taxpayers based on their inclusion in the category of large taxpayers, the evolutionary process of forming specific experiences in this regard continues. Considering it appropriate to conduct a theoretical analysis of this situation from a scientific and methodological point of view, we will consider the state of its formation.

The Resolution of the President of the Republic of Uzbekistan No. PQ-3802 dated June 26, 2018 "On measures to radically improve the activities of the State Tax Service" and the Resolution of the Cabinet of Ministers of the Republic of Uzbekistan No. 320 dated April 17, 2019 "On measures to further improve the activities of the State Tax Service" are of particular importance. It was on the basis of these resolutions that the new edition of the Regulation on the State Tax Committee of the Republic of Uzbekistan and the Regulation on the Interregional State Tax Inspectorate for Large Taxpayers were approved. These regulations set out as the main tasks of the State Tax Committee "the creation of favorable conditions for taxpayers to voluntarily fulfill their tax obligations, the unconditional



## **International Conference on Modern Science and Scientific Studies**

Hosted online from Madrid, Spain

Website: econfseries.com

20<sup>th</sup> April, 2025

fulfillment by each employee of the target task "Tax Service - a reliable partner of honest taxpayers", the implementation of work to improve the legal culture of taxpayers, the implementation of comprehensive measures to prevent, detect and eliminate tax violations, and the improvement of work with taxpayers through a complete transition to contactless electronic services for taxpayers"<sup>1</sup> the burden of such as the tax authorities has determined important areas of tax administration in a new form and content.

An institutional structure within the State Tax Committee of the Republic of Uzbekistan - the Interregional State Tax Inspectorate for Large Taxpayers - has been created, and its main task is to carry out tax administration of large taxpayers, regardless of their location and activities.

If we analyze the status of the implementation of the above tasks and functions within the framework of tax administration by the Interregional State Tax Inspectorate for Large Taxpayers and its territorial divisions in 2019-2021, we can see that the following results have been achieved.

Regarding the organization of large taxpayer accounts and ensuring the full collection of taxes and fees provided for by tax legislation:

The number of large taxpayers served by the Interregional State Tax Inspectorate for Large Taxpayers was 1,416 in 2019, 836 in 2020, and 1,149 in 2021. The sharp decrease in the number of taxpayers in 2020 is due to the transformation of commercial banks and their republican branches during this period. That is, in order to simplify the process of submitting tax reports and making payments for commercial banks, the personal accounts of bank branches where tax accounting is maintained were merged with the personal accounts of their head offices. As a result, additional conveniences were created for commercial banks, centralized settlements and payments for all types of taxes were established, and the processes of submitting reporting forms were carried out only through head offices.

In 2021, based on the established criteria for including legal entities in the category of large taxpayers, an analysis was conducted of enterprises operating throughout the republic, and an additional 313 enterprises were included in the category of large

---

<sup>1</sup> Ўзбекистон Республикаси Вазирлар Маҳкамасининг 2019 йил 17 апрелдаги “Давлат солиқ хизмати органлари фаолиятини янада такомиллаштириш чора-тадбирлари тўғрисида”ги 320-сонли қарори



## **International Conference on Modern Science and Scientific Studies**

Hosted online from Madrid, Spain

Website: econfseries.com

20<sup>th</sup> April, 2025

taxpayers. A number of changes were made to the established criteria for including legal entities in the category of large taxpayers in 2020 and 2021. In particular, legal entities using the airspace of the Republic of Uzbekistan for the purpose of transporting passengers, carrying out international air communications and being part of them were also considered large taxpayers. In addition, the criterion that refers to legal entities that extract, process, supply and sell hydrocarbon raw materials and mineral resources, as well as legal entities that produce and supply electricity, with the exception of gas stations for automobiles, has been amended to read as follows: “legal entities that extract, process, supply and sell hydrocarbon raw materials and mineral resources, as well as legal entities that produce and supply electricity, and permanent establishments (branches) of foreign legal entities in the Republic of Uzbekistan that supply goods (works and services) to them, with the exception of gas stations for automobiles.” At the same time, a clause has been added to the regulation on foreign legal entities that provide electronic services, the place of implementation of which is the Republic of Uzbekistan, and foreign legal entities that provide electronic services have been included in the category of large taxpayers.

In 2019, the Inspectorate collected 45,859 billion soums in tax revenues to the state budget, which is 55 percent of the total taxes collected in the republic. Despite the pandemic in many countries of the world, in particular in our Republic, the Inspectorate collected 67,717 billion soums of the payments set for the budget for 2020. This is 65 percent of the total taxes collected in the country, while in 2021 we can see that 81,771 billion soums were collected, which accounts for 64 percent of the total revenue.

Regarding the organization of tax control over compliance with tax legislation in the activities of large taxpayers:

In 2020, the Inspectorate conducted 181 in-house tax audits, and as a result of the audit, 1,777 billion soums of additional tax were assessed, while in 2021, 1,003 in-house tax audits were conducted, and 1,793.6 billion soums were assessed, and as a result of the audit, 540.9 billion soums were assessed at 32 enterprises, and 28.4 billion soums were assessed at 115 mobile tax audits.



## **International Conference on Modern Science and Scientific Studies**

Hosted online from Madrid, Spain

Website: [econfseries.com](http://econfseries.com)

20<sup>th</sup> April, 2025

Regarding the implementation of service and technical support for large taxpayers on the basis of mutual cooperation in fulfilling tax obligations:

Service and technical support for large taxpayers on the basis of mutual cooperation in fulfilling tax obligations is being implemented, 320 appeals on the use of interactive services, software errors in the system and other topics were responded to in 2019, 711 in 2020, and 812 in 2021. Also, in 2020, a system for issuing stickers for the use of vehicles for taxpayers during the Pandemic was created.

The “Value Added Tax Refund” module was developed in collaboration with the State Tax Committee, and work is currently underway to create 6 interactive services. As a result of the study of cases related to the relocation of enterprises from one region to another and their merger with another enterprise in the SIAIJ-5 program, more than 400 tax offices were transferred to the head offices as a result of the centralization of large enterprises in 2020. During 2021, changes were made to the tax offices of 450 enterprises, as a result of which 2.4 billion soums of tax debt and 4.5 billion soums of overpayment were transferred to the relevant personal accounts, reducing overpayments and tax debt. In order to ensure regular communication between employees and taxpayers, 60 city communication network lines (SipTrunk) and additional communication channels serving 60 IP phones at the same time were opened in 2020-2021, providing direct communication, and work was carried out to assign them to responsible employees.

Regarding the implementation of comprehensive measures to prevent, detect and suppress tax violations within the framework of the administration of large taxpayers: In 2019, 197 administrative cases on tax violations were sent to the court for consideration, 188 in 2020 and 401 in 2021. The amount of administrative fines applied was 28.4 million soums in 2019, 76.5 million soums in 2020 and 171 million soums in 2021. 7 seminars and trainings were held with taxpayers in 2019, 8 in 2020 and 69 in 2021. More than 40 proposals were developed in 2019, 102 in 2020, and more than 105 in 2021 on the development of tax regulations and further improvement of tax legislation.

One of the indicators characterizing the formation of the taxation administration of large taxpayers in the tax system of Uzbekistan is the dynamic change in the number of enterprises included in the categories of large taxpayers by type of activity and



## International Conference on Modern Science and Scientific Studies

Hosted online from Madrid, Spain

Website: econfseries.com

20<sup>th</sup> April, 2025

industry. Therefore, if we pay attention to the data in the table above, the number of enterprises in this category was 1,416 in 2019, while at the beginning of 2022 this indicator amounted to 957, indicating a decrease in their number. The main reason for this was the slight change in the criteria for determining enterprises falling into this category, as well as a sharp reduction in the number of organizations falling into the category of commercial banks, commodity, stock and currency exchanges, and the instability in the financial and economic activities of some taxpayers, which led to their no longer meeting the criteria for enterprises in this category, as well as a reduction in the number of enterprises within Navoi KMK JSC, Almalyk KMK JSC and their constituent organizations, among other similar factors.

Provide clear and transparent guidance to large taxpayers on their rights and obligations, tax audit processes, and expectations from tax authorities. Clear articulation of tax laws, regulations, and audit procedures fosters a cooperative environment between tax authorities and taxpayers, reduces disputes, and promotes voluntary compliance.

Establish voluntary disclosure programs that encourage large taxpayers to proactively disclose any past violations or irregularities. Such programs encourage taxpayers to rectify their tax affairs, pay unpaid taxes, and avoid penalties or legal consequences. Voluntary disclosure programs help uncover hidden tax liabilities and contribute to improving overall tax law.

## References

1. O‘zbekiston Respublikasi Soliq kodeksi- Toshkent: G‘afur G‘ulom nashriyot uyi 2020.- 640 b.
2. Нормурзаев Умид Холмурзаевич Хукуматимиз томонидан берилаётган солиқ имтиёзларининг ҳисобини уритиш ва самарадорлигини таҳлил қилиш масалалари // Экономика и финансы (Узбекистан). 2021. №10 (146). URL: <https://cyberleninka.ru/article/n/ukumatimiz-tomonidan-berilayotgan-soli-imtiyozlarining-isobini-yuritish-va-samaradorligini-ta-lil-ilish-masalalari> (дата обращения: 17.01.2023)





## International Conference on Modern Science and Scientific Studies

Hosted online from Madrid, Spain

Website: [econfséries.com](http://econfséries.com)

20<sup>th</sup> April, 2025

- 
3. Нормурзаев У. Х. 2021 йилдаги солиқ ма'мурсилиги ҳамда солиқ кодексига киритилган о'згартириш ва қўшимчалар уизасидан //Интернаука. – 2021. – Т. 6. – №. 182 част 2. – С. 99.