AMERICAN JOURNALS
Open Access, Peer Reviewed Journals

American Journal of Business Management, Economics and Banking
ISSN (E): 2832-8078 Volume 43, December - 2025

IDENTIFICATION AND ANALYSIS OF TAX RISKS THROUGH TAXPAYER SEGMENTATION

Elbaeva M. R.
TAQU PhD , Associate Professor
Email: elbaevamuqaddas84@gmail.com
ORCID: 0009-0007-5515-9384

A B S T R A C T	K E Y W O R D S
This article analyzes theoretical and practical approaches to identifying and managing tax risks through segmentation of taxpayers' activities. It is argued that the financial activities of any business entity are closely related to various risk factors and that it is necessary to form an effective risk management system to reduce the negative consequences of these risks. The study examines in detail the nature of tax risks, the factors that cause them, and the mechanisms for managing them. It is noted that the current tax risk management system is not sufficiently developed, which creates the need for institutional development and training of qualified specialists in this area. It also the risk effective management instrument as tax payers' activity segmentation main stages illuminating is given.	Tax risks; tax risk assessment; tax relations; tax policy; taxpayer segmentation.

Introduction

In accordance with the Resolution of the Cabinet of Ministers of the Republic of Uzbekistan No. 11 dated January 7, 2021 “On tax risk management, identification of taxpayers (tax agents) at risk of tax, and organization and conduct of tax audits”, taxpayer segmentation is considered as an element of determining the level of risk of non-fulfillment or partial fulfillment of tax obligations, that is, the process of dividing taxpayers into certain categories [1]. However, in reality, segmentation reflects the level of threat, which is determined by the probability of negative consequences and the potential magnitude of their impact on the results of the business entity's activities.

In practice, segmentation reflects not only the likelihood of tax liability violations, but also the potential negative impact of these situations on the activities of the business entity. In tax practice, risks are identified and comprehensively assessed mainly through the automated information system "Tax Risk Identification, Analysis and Assessment".

Therefore, it is important to develop measures aimed at reducing tax risks, constantly monitor their effectiveness, monitor compliance with tax legislation, and regularly update existing databases. In this regard, assessing activities taking into account the segmentation of taxpayers is of particular importance.

Literature review on the topic

Analysis of scientific sources shows that tax risks are primarily based on commercial and financial risks. In particular, Sh.V. Boboev[2] emphasizes that the process of tax forecasting is inextricably linked with tax risks, noting that there is a certain discrepancy between actual revenues and forecast indicators.

Foreign researchers have also paid great attention to this issue. In particular, SA Filin[3] interprets tax risk as the possibility of financial losses that a business entity may incur as a result of changes in tax legislation or errors in calculations. In addition, M. Bird and M. Zolt[4] emphasize the importance of a differential approach in their work "Tax Policy in Developing Countries".

M. Allingham and A. Sandmo The classical model developed by explained taxpayer behavior in terms of expected benefits, scientifically demonstrating that the likelihood of inspection and increased penalties reduce tax evasion.

Research methodology

The research used general and special methods. Observation, comparison, grouping and generalization methods served as a systematic analysis of tax risks. Also, using analysis and synthesis methods, mechanisms for identifying risks based on segmentation of taxpayer activities were studied.

Analysis and results

This study examined the practical aspects of identifying and analyzing tax risks based on the segmentation of taxpayers' activities. During the analysis, special attention was paid to identifying the mechanisms of tax risk formation by grouping taxpayers by type of economic activity, financial indicators, level of tax discipline, and behavioral factors.

Typically, segmentation by multiple criteria is used to assess risks, which makes the system more complex, but also more effective.

To practice current to grow for following offers previously is pushed :

1. Tax the dangers in evaluation applicable indicators system permanent accordingly updated to go
2. Tax real - time payment in mode segmentation opportunity the only information that provides platform current to be
3. Danger to the level looking at control and service show mechanisms differential application

Tax risks are assessed both by the fiscal system and by taxpayers. Tax risks from the fiscal system are associated with the possibility of not receiving budget revenues due to errors, abuses or evasion schemes. Risks from the taxpayer side consist of additional assessments, fines, blocking of property losses accounts. Segmentation of taxpayers allows for the early identification of high-risk areas, increasing the targeting of tax control and reducing the administrative burden on honest entities.

Tax risk identification based on segmentation of taxpayer activities is carried out using the information system "Tax risk identification, tax risk identification, analysis and assessment". The system generates analytical data in the form of a table reflecting violations and shortcomings in the calculation and (or) payment of taxes. Based on the analysis of data from additional sources, areas with a high risk of tax evasion, as well as potential amounts of unpaid taxes, are separately indicated for each taxpayer.

In addition, these criteria include the submission of tax returns and the results of tax audits for several years with an annual turnover of less than one billion soums, which entitles the company to apply special tax regimes in accordance with the Tax Code of the Republic of Uzbekistan [8].

Classification of taxpayers' activities into low, medium and high risk categories depending on the level of tax risk is carried out based on certain criteria presented in the figure below:

Table 1 General description of tax risks by taxpayer segments

No.	Segment	Risk level	Main risk factors	Recommended control measure
1	Large enterprises	Medium	Transfer pricing, export-import transactions	Horizontal monitoring, thematic audit
2	Medium business	Medium–high	Underreporting income and overstating expenses	Risk-based inspection
3	Small business	High	Cash handling, reporting violations	Camera inspection, explanatory work
4	Micro entities	Low–medium	Reporting errors	Advice and prevention
5	Newly registered entities	High	Fake deals, "one-day" companies	Initial control and monitoring

When assessing the risk of non-payment of taxes and fees during a tax audit, special attention should be paid to the following situations:

- Incorrect formation or concealment of the tax base: In this case, attempts are made to reduce taxes by reducing taxable income or assets.
- Hiding the tax base without lowering prices: In this case, an attempt is made to hide the tax base without lowering prices, but through other means.
- Use of additional or fraudulent documents: In this case, attempts are made to understate income by transferring proceeds from the sale of goods or the provision of services to a period subsequent to the reporting period.
- Failure to comply with Article 242 of the Tax Code of the Republic of Uzbekistan when performing construction (contract) work: In this case, an attempt is made to evade taxes by not complying with the established tax standards when performing construction work.
- Performing work at the expense of budget funds that is not financed from the electronic register: In this case, attempts are made to evade taxes through work performed at the expense of budget funds, but not financed from the electronic register.

Table 2 Distribution of tax risk levels by taxpayer segments

Taxpayer segment	Low risk	Medium risk	High risk
Conscientious taxpayers	65 %	30%	5%
Small and micro businesses	25%	50%	25%
Trade and services sector	15%	45%	40%
Large taxpayers	20%	50%	30%
Export-import operators	10%	35%	55%
Regular violators	5%	20%	75%

Figure 1 shows the general distribution of tax risk levels across taxpayer segments. Analysis of the diagram shows that the highest tax risk falls on entities engaged in export-import activities and taxpayers who regularly violate the rules. On the contrary, a low risk level prevails in the segment of conscientious taxpayers with high tax discipline. These results confirm the need to organize tax control based on a risk-based approach.

When analyzing the results of determining the amount of identified tax risk, it is also advisable to analyze the risk of fraudulent entrepreneurship during a tax audit (cases of concluding transactions with an entrepreneur, establishing “one-day” companies, registering EHF without bank turnover, storing, using and selling unregistered (uncashed) goods, abusing the right to apply tax regimes by not registering EHF for actually carried out bank turnover, applying for VAT reimbursement on forged documents without carrying out import-export operations, making illegal changes to the fiscal memory maintenance program of cash register equipment or not entering sales volumes.

Also, when conducting a tax audit as a result of segmenting taxpayers' activities, special attention should be paid to the risks of tax evasion. In our opinion, during such audits, special attention should be paid to the following: the accumulation of large amounts of tax debts, the rapid accumulation of large amounts of tax debts and bankruptcy filings, non-payment of tax debts or accrued taxes in the process of mergers or acquisitions, as well as non-payment of taxes due to artificially inflated costs.

During a tax audit, it is necessary to verify the accuracy of taxpayers' reports. Several types of reports are prepared and their arithmetic is checked. For example, cash flow amounts, payment amounts, expense amounts, etc.

It should also be noted that segment analysis and audit are effective tools for comparing the results of tax risk assessments identified during audit activities with actual practice. They are especially effective in cases of wage concealment - for example, when the employer does not report or provides insufficient information about the actual number of employees, as well as the amount of wages paid. In addition, the analysis can identify aggressive tax planning methods of tax evasion, the use of tax benefits that are not related to the actual activities of the company, as well as cases of adding large amounts of cash, real estate, construction materials and other assets of unknown origin to the authorized capital and their subsequent sale without a license, which is also associated with the formation of taxable capital.

In our opinion, it is advisable to pay special attention to the following cases when conducting a tax audit: incorrect calculation of non-resident income tax and value added tax on imported services classified as tax risk in the field of foreign economic activity; underestimation or overestimation of the cost of goods in export-import transactions at prices that significantly deviate from the market price; illegal application of tax regimes by hiding the taxable base or by repeatedly exporting or importing the same goods between countries (the so-called “carousel” scheme); tax evasion by creating false receivables or payables in foreign trade transactions; export without receiving income in order to illegally apply the zero VAT rate; as well as manipulation of transfer prices between related parties in order to minimize taxes.

Conclusion and suggestions

According to the research results, segmentation of taxpayers' activities has important practical value in identifying and assessing tax risks. This approach allows tax authorities to rationally use resources, increase control efficiency, and strengthen voluntary tax discipline.

To practice current to grow for following offers previously pushed :

1. Tax the dangers in evaluation applicable indicators system permanent accordingly updated to go
2. Tax real - time payment in mode segmentation opportunity the only information that provides platform current to be

3. Danger to the level looking at control and service show mechanisms differential application

REFERENCES

1. https://lex.uz/docs/-5206072
2. Boboev Sh.B. "Improving the mechanism for forecasting tax revenues from individuals". Abstract of the dissertation of the candidate of economic sciences. Tashkent, 2020.
3. Filin, SA Finansovyy risk i ego sostavlyayushchie dlya obespecheniya protsesa otsenki i effektivnogo upravleniya finansovymi riskami pri prinyatii finansovykh upravlencheskikh resheniy / S.A. Filin // Finance and credit. — 2002 — N3. — P.21-31
4. Bird, R. (2008). Tax Challenges Facing Developing Countries. Bulletin for International Fiscal Documentation;
5. Allingham, MG, & Sandmo, A. (1972). Income Tax Evasion: A Theoretical Analysis. Journal of Public Economics,1(3–4), 323–338. https://doi.org/10.1016/0047-2727(72)90010-2
6. Stankevicius, E., & Kundeliene , K. (2017). Theoretical Approach to Taxpayers' Segmentation. In Contemporary Issues in Business, Management and Education 2017 (pp. 127–135). Vilnius: Vilnius Gediminas Technical University. https:// doi.org/10.3846/cbme.2017.067
7. González, C., Delgado, MJ, & de Lucas, S. (2021). Segmentation of Potential Fraud Taxpayers and Characterization in Personal Income Tax Using Data Mining Techniques. Hacienda Pública Española / Review of Public Economics, 239(4), 127–157. https://doi.org/10.7866/HPE-RPE.21.4.4
8. Uzbekistan Republic of Tax Code of Uzbekistan Law of the Republic of Uzbekistan No. URQ - 599 of December 30, 2019 with approved .
9. Elbaeva M.R. A practical approach to identifying and assessing tax risks based on the segmentation of taxpayer activities https://yashil-iqtisodiyot-taraqqiyot.uz October 16, 2025