

Culture of tax contribution in colombia: a tool against evasion and avoidance

Cultura tributaria en Colombia: una herramienta contra la evasión y la elusión
Cultura fiscal na Colômbia: um instrumento contra a evasão e a fraude fiscais

DOI: <https://doi.org/10.21803/penamer.16.32.696>

Milicen Borja Barrera

<https://orcid.org/0000-0002-4228-9012>

Candidata a Doctora en Administración
Universidad La Salle - Mg en tributación
- Contadora Pública - Directora
especializaciones en Gerencia Tributaria y
Mercadeo - mborjab28@unisalle.edu.co -
Universidad La Salle.

Luz Dary González Cortés

<https://orcid.org/0000-0002-1472-5286>

Profesora Investigadora en el Doctorado en
Administración de la Universidad de La Salle
- Doctora en Proyectos - Máster en auditoría
de gestión y Contabilidad - Contadora Pública -
luzdgonzalez@unisalle.edu.co. / ldgonzalezc@
hotmail.com Grupo de Investigación en
Desarrollo, Estructuras Económicas, Políticas
Públicas y Gestión, Escuela de Negocios,
Universidad de La Salle, Bogotá, Colombia.

Abstract

Introduction: The collection of taxes is essential for the economy of any country, including Colombia, enabling the State to fulfill its social and cultural responsibilities. However, the question arises whether there is a contributory culture in Colombia that avoids practices such as tax evasion and avoidance. Colombia's Tax Administration, through DIAN, has implemented programs like "Culture of Contribution in School" and "For a More Honest Colombia" to promote a tax culture and avoid coercion through severe sanctions.

Objective: The purpose of this article was related to know according to the literature the cultural aspects that surround the tax culture in Colombia and how they are used as tools against tax evasion. **Methodology:** The paper is based on a quantitative methodological approach, seeking to identify literature published in academic and scientific journals. This article theoretically examines tax culture, tax evasion and avoidance, and the sanctioning regime in Colombia, assessing how these factors influence the rates of tax evasion and avoidance and the country's sanctioning stance. **Results:** Aspects such as citizens' reluctance to pay taxes, the uncertainty generated by constant tax reforms, and the need to promote tax compliance for the country's development are discussed. **Conclusion:** It concludes that citizen contribution will increase if there is observed good management of state resources, equitable tax reforms, and effective educational work on the importance of contributing, thus increasing the tax culture in Colombia.

Keywords: Tax culture; Tax evasion; Tax avoidance; Tax obligations; Tax penalties.

Resumen

Introducción: El recaudo de impuestos es fundamental para la economía de cualquier país, incluido Colombia, permitiendo al Estado cumplir con sus responsabilidades sociales y culturales. Sin embargo, surge la pregunta de si en Colombia existe una cultura contributiva que evite prácticas como la evasión y la elusión tributaria. La Administración Tributaria de Colombia, a través de la DIAN, ha implementado programas como "Cultura Contributiva en la Escuela" y "Por una Colombia más Honesta" para promover una cultura contributiva y evitar la coacción a través de sanciones severas. **Objetivo:** El propósito de este artículo estuvo relacionado con conocer de acuerdo a la literatura los aspectos culturales que rodean la cultura tributaria en Colombia y como son utilizados como herramientas contra la evasión fiscal. **Metodología:** El artículo se basa en un enfoque metodológico cuantitativo, buscando identificar literatura publicada en revistas académicas y científicas. El artículo examina teóricamente la cultura tributaria, la evasión y elusión fiscal y el régimen sancionatorio en Colombia, evaluando cómo estos factores influyen en las tasas de evasión y elusión fiscal y en la postura sancionatoria del país. **Resultados:** Se discuten aspectos como la reticencia de los ciudadanos a pagar impuestos, la incertidumbre generada por las constantes reformas tributarias y la necesidad de promover el cumplimiento tributario para el desarrollo del país. **Conclusiones:** Se concluye que la contribución ciudadana aumentará si se observa un buen manejo de los recursos del Estado, reformas tributarias equitativas y una efectiva labor educativa sobre la importancia de contribuir, aumentando así la cultura tributaria en Colombia.

Palabras clave: Cultura tributaria; Evasión tributaria, Elusión tributaria, Obligaciones tributarias; Sanciones tributarias¹.

¿Cómo citar este artículo?

Borja; M. y González-Cortés; L. (2023). Culture of tax contribution in colombia: a tool against evasion and avoidance. *Pensamiento Americano*, e#:696. 16(32), 1-17. DOI: <https://doi.org/10.21803/penamer.16.32.696>.

¹ Los términos clave han sido recuperados a partir del Tesauro [relacionar el nombre del Tesauro de donde se han obtenido].



Resumo

Introdução: A coleta de impostos é fundamental para a economia de qualquer país, incluindo a Colômbia, permitindo ao Estado cumprir as suas responsabilidades sociais e culturais. No entanto, coloca-se a questão de saber se existe na Colômbia uma cultura fiscal que evite práticas como a evasão e a fraude fiscais. A Administração Fiscal colombiana, através da DIAN, implementou programas como "Cultura Fiscal na Escola" e "Por uma Colômbia mais Honesta" para promover uma cultura fiscal e evitar a coação através de sanções severas. **Objetivo:** O objetivo deste artigo está relacionado com a literatura sobre os aspectos culturais que envolvem a cultura fiscal na Colômbia e a forma como são utilizados como instrumentos contra a evasão fiscal. **Metodologia:** O artigo baseia-se numa abordagem metodológica quantitativa, procurando identificar a literatura publicada em revistas académicas e científicas. O artigo analisa teoricamente a cultura fiscal, a evasão e a elisão fiscal e o regime sancionatório na Colômbia, avaliando de que forma estes factores influenciam as taxas de evasão e elisão fiscal e a postura sancionatória do país. **Resultados:** São discutidos aspectos como a relutância dos cidadãos em pagar impostos, a incerteza gerada pelas constantes reformas fiscais e a necessidade de promover o cumprimento das obrigações fiscais para o desenvolvimento do país. **Conclusões:** Conclui-se que a contribuição dos cidadãos aumentará se houver uma boa gestão dos recursos do Estado, reformas tributárias equitativas e educação eficaz sobre a importância de contribuir, aumentando assim a cultura tributária na Colômbia.

Palavras-chave: Cultura tributária; Evasão fiscal; Elisão fiscal; Obrigações tributárias; Penalidades tributárias.



INTRODUCTION

Tax culture is an unknown concept in Colombia, where constant tax reforms create fiscal uncertainty, and a marked tendency towards corruption in the use of public resources leads citizens to focus more on finding ways to evade or avoid taxes. This article provides a theoretical, normative, and documentary review of writings by various authors on tax culture and how its absence contributes to tax evasion and avoidance, and how the State addresses this issue through programs like "culture of contribution" to increase tax collection without resorting to punitive measures against taxpayers, responsible parties, or withholding agents.

This documentary review was conducted using recognized search strategies in scientific journals, studies, and statistics published by public entities in Colombia. The theoretical approach began with conceptualizing the term 'culture' and how it is contextualized through various human actions, addressing culture from organizational, political, educational perspectives, and finally focusing on tax culture. Concepts of tax culture and fiscal morality from various authors in other countries were also explored and compared with the development of this concept in Colombia (Sandoval et al., 2020; Citarella e Insignares, 2020). The benefits or incentives offered by the Colombian Government for voluntary tax compliance and the sanctions imposed for non-compliance with the formal obligation to pay were analyzed. The discussion focused on aspects related to fiscal uncertainty, higher tax burdens for middle-class taxpayers, and the absence of a tax culture in the country.

METHODOLOGY

This article is the result of a documentary study with theoretical, normative, and documentary content, through a systematic review and documentary analysis of literature related to tax culture and its relationship with the social problem of non-compliance with tax obligations and the marked tendency towards the applicability of the sanctioning regime. The aim was to identify literature published in academic and scientific journals; therefore, no specific period was segmented, and in this sense, the research is documentary. The investigated variables were tax culture - tax evasion - tax avoidance - tax sanctions.

RESULTS

3.1. CULTURE

Before discussing tax culture, we must refer to the concept of culture from an anthropological viewpoint. Firstly, the word culture comes from the Latin *cultūra*, and anthropology focuses on the comprehensive study of human beings. Thus, cultural anthropology centers on analyzing human behavior, considering their religion, customs, and beliefs. According to Tomas (two thousand), for Anthropology, culture is the common noun "that indicates a particular way of life, of people, of a period, or of a human group". Indeed, in many municipalities in Colombia, comments about actions embedded in the phrase "here it is customary" are heard, from culinary combinations to lifestyles that can be quite different from one place to another, defining the culture of that place.

There are different types of culture, associating the term with aspects that complement and specify within a theoretical-practical space the approach to the term and linking concepts such as organizational culture, po-

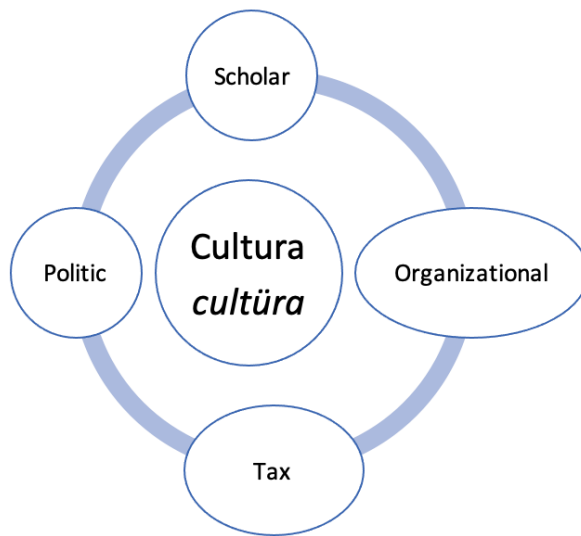


litical culture, school culture, and all those that can be included in any academic, social, economic, or geographical context and that allow establishing similarities or even serving as support for achieving the objectives set by that context.

School culture aims to establish policies that reflect the identity of the school, and these are usually used similarly to the concepts of school grammar and climate (Elías, 2015); other authors like Bonet-Martí and Ubarsart-González (2021), in his study of territorial conflict and changes in political culture in Catalonia (Spain), cites the definition of political culture by Almond and Verba, (1970) as "the set of specifically political orientations of citizens towards the political system, towards its components, and towards oneself as part of the system"; the concept of political culture is influenced by family, tradition, and even personal interests, leading individuals to support a party or state scheme, whether left or right. Regarding organizational culture, Schwartz and Davis (1981, p. 33) define it as "a pattern of beliefs and expectations shared by the members of the organization. These beliefs and expectations produce norms that powerfully shape the behavior of individuals and groups within the organization," and Cújar (2013) states that such culture not only exists but must be measured and analyzed in its relationship with other variables that affect the achievement of an institution's objectives. Just like these two concepts, many authors address other types of culture, but the focus of this article is on tax culture.

Figure 1.

Types of Culture.



Source: Own elaboration (2023)

3.2. CULTURE AND EDUCATION

From an anthropological perspective, one may question how culture relates to the concept of education. León (2007) and stated that education forms the individual, subjective, and responsible subject in and of the world shown and taught to them. If one is not free, they are not responsible, cannot decide, and are not educated; this implies that even the poor decisions leading to economic, social, and penal consequences are due to a lack of education, as evident in any related news or interview. Education transforms and enhances the natural man to bring forth a different human being.

Durán (2009), citing Piaget's theory (1973), explained that knowledge – understood as the result of educa-

tion – occurs because of various learnings and that this process grows over time and with the cognitive capacity of the individual. As a human being grows, their ability to receive and assimilate experiences that derive learning and therefore education increases.

In this sense, Bruner (2013) combines the concepts of culture and education and addresses two hypotheses related to the functioning of the mind: the first is that the mind is nourished through a computational mechanism, in the sense that information is there, arranged and organized to be taken and appropriated, as a computer would do. This raises the question of the educator's role in this case. How can an educator contribute beyond the information provided by a computer? It could be assumed that from there derive many elements that comprise the now-called learning objectives, which address not only knowing how to do but also being. The second is that the mind materializes through human culture, hence Bruner (2013) calls it culturalism, defining the concept as the fact that the mind cannot evolve without the existence of culture. Without culturalism, the human being possesses information derived from the computational mechanism, but it is culture that gives this information color, shape, and name.

On the other hand, Cárdenas (2011) uses Piaget's thesis, stating that "if knowledge results epistemologically from the subject-object relationship, culture is the crossroads that cannot be ignored because there the individual as a biological and psychic being connects with social reality." In the context of this article's approach to culture, the popular saying "when in Rome, do as the Romans do" could be used, and from Piaget's statement, it can be understood that knowledge (education) will always be influenced by the surrounding culture.

3.3. FINANCIAL EDUCATION

Organizational culture is an essential element in boosting a company's competitiveness and productivity, as it recognizes intellectual capacities, work, and the exchange of ideas among groups. By facilitating the exchange of ideas, it eases the company's activities, creating an atmosphere of camaraderie and, at the same time, commitment to work favorable to its production level (Soria, 2008). In this measure, understanding the concept of organizational culture, it is possible to add the concept of financial and therefore tax education of a country. This concept has recently gained strength, and it could even be said that after the world went through the COVID-19 health crisis, it became evident that individuals lack financial education in relation to the absence of savings to face these crises. Financial education is the set of knowledge and/or tools related to resource management, and it is really directed at personal finance management, as societies or companies manage their finances based on planning and strategic objectives of the business sector. Personal finances within financial education have gained ground, even from the financial sector, training on the subject is offered, and banking entities have modernized their applications to constitute them as a tool in resource management; however, in Colombia, financial education is not a strength. Ocampo (2014) conducts an analysis of financial education from the approach of entities and the creation of programs that encourage the proper use of finances. In this sense, it is possible to observe the lack of citizen interest in fulfilling their obligations, paying their taxes and obligations to the State so that it can fulfill its social function of income redistribution. It is then that the concept of tax culture begins to gain strength in many countries of Latin America and the world. If you educate the citizen in civic culture, you must include the culture of contribution, or also called tax culture, where it is taught why we must contribute.

Now, while it is achieved that contributing to the State's burdens goes from being a coercive action to a fulfillment of duty on the part of the citizen, tax obligations do not stop, and the tax burden continues to increase, making it essential for the company and the citizen to exercise proper tax planning.



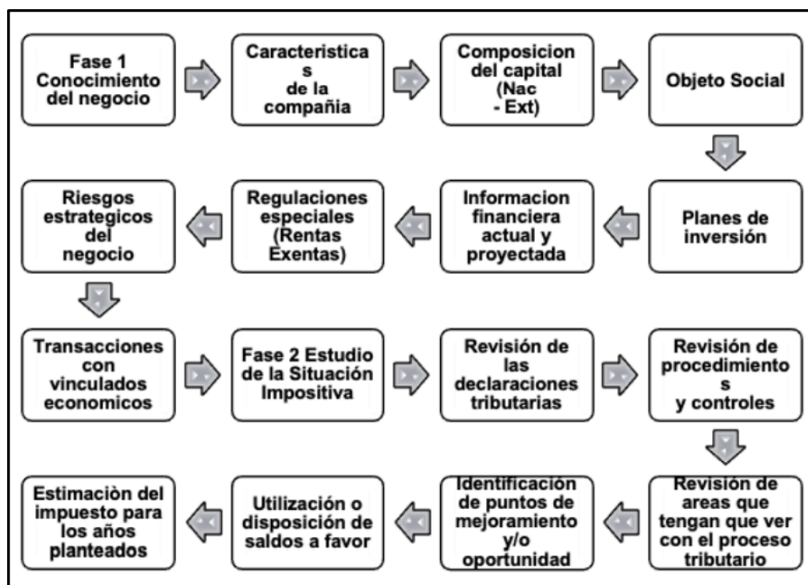
3.3. TAXPLANNING When addressing the concept of tax planning, authors like Parra (2014) define it as the set of useful strategies in fiscal management, which companies adopt in advance, with the aim of conducting their economic activities seeking the highest return on their investment, at the lowest possible tax cost. Garizabal et al. (2020) proposes tax planning strategies whose purpose is to optimize the wealth of taxpayers, as the expense decreases, the profit increases and consequently the wealth grows. Garizabal et al. (2020) shows that tax planning is generated in two phases: first, knowledge of the business, and second, the study of the company's tax situation. The first indicates that before establishing a strategy, information related to the business, such as its corporate purpose, capital structure, among other aspects, must be obtained; then, in phase 2, the tax declarations already presented (history) are reviewed to identify procedures and controls and establish the strategies to follow for correct planning (See figure No. 2).

TAX PLANNING

When addressing the concept of tax planning, authors like Parra (2014) define it as a set of useful strategies in fiscal management, which companies adopt in advance, with the aim of conducting their economic activities seeking the highest return on their investment, at the lowest possible tax cost. Garizabal et al. (2020) proposes tax planning strategies whose purpose is to optimize the wealth of taxpayers, as the expense decreases, the profit increases and consequently the wealth grows. Garizabal et al. (2020) shows that tax planning occurs in two phases: first, understanding the business, and second, studying the tax situation of the company or entity. The first phase indicates that before establishing a strategy, one must obtain information about the business related to its corporate purpose, capital structure, among other aspects; then, in phase 2, the tax declarations already presented (history) are reviewed to identify procedures and controls and establish the strategies to follow for correct planning (See figure No. 2).

Figure 2.

Fases de la planeación tributaria.



Source: Garizabal et al. (2020, p.3).

Both authors agree that the goal of tax planning is to protect the taxpayer's wealth, and Mera (2012) includes it as an administrative tool; which is coherent since at the end of the exercise it is the company's administration that is responsible for the good management of the resources that partners (owners) have provided and that it is also the administration that must account for the increase in wealth and justify its decrease, if it occurs. Thus, tax planning is the total or partial response to fiscal uncertainty in Colombia and the world. It is about anticipating, based on previous norms, current norms, and economic predictions, to contribute within the legal time to do so, without incurring penalties and/or late interest. It can also be said that tax planning is the application of one or several strategies that allow reducing the effective payment of a tax, strategies related to legal benefits granted by Colombian tax norms such as the so-called tax discounts.

TAX CULTURE

Armas (2009) defines tax culture as “the voluntary compliance with tax duties and obligations by the taxpayer and not with the implementation of strategies to increase collection with the application of sanctions by the tax administration” (p.141). In Colombia, tax uncertainty is a common factor; practically, the concept of tax culture is unknown, and the concepts and comments are negative regarding the tax issue, the imposition of paying taxes to the State, and there is observed dissatisfaction with the deficiencies in the public resource management.

In Latin American countries, this concept has already been explored. For example, Ecuador is a country where the highest amount of income is obtained from tax collection, even more than from other sources such as oil exports; therefore, the government promotes the country's tax culture (Urrutia, 2021). In a study conducted in this country on tax culture and fiscal sustainability (Andrade & Cevallos, 2020), it was observed that, in 2017 and 2018, there was a large percentage of collection due to interests on arrears and penalties derived from non-compliance with tax obligations, even greater than the values collected from taxes of companies belonging to the RISE (Simplified Regime), which make up almost 50% of the total business sector in Ecuador.

On the other hand, in Peru, they agree that tax culture is the basis for the country's sustenance through the payment of taxes and that no citizen, without exception, should omit this obligation; but this process must be achieved through the rescue of values such as responsibility and civism, in such a way that a strong and fair relationship between the State and the citizen is generated (Reátegui, 2016). In this context, concepts of fiscal culture and tax culture are defined separately; on one hand, fiscal culture is considered an intrinsic behavior manifested by the citizen in relation to the fulfillment of their fiscal obligations; and on the other, tax culture is the way in which the citizen complies with their obligations according to the degree of perception of the State or their personal relationship with it.

In other words, fiscal culture does not depend on the State's compliance with its inherent functions, whereas tax culture is observed in the citizen to the same degree that they receive state services (Morales, 2019). Vite (2021) analyzes the key factors that influence the tax culture of micro-enterprises in Machala (Ecuador); he conducts a non-experimental study where he analyzes variables such as gender, level of education, business permanence, and compliance with tax obligations, among others.

In his study, he concludes that, to strengthen tax culture, several actors must participate, not only the one obliged to pay, and that the main axis of such joint participation is to achieve the taxpayer's unders-



tanding of the payment of taxes and why their contributions allow the development of the country. González Capote et al. (2020) agrees that training in tax culture in Guayaquil (Ecuador) would be the way to reduce bad fiscal practices and that ignorance of tax obligations is also an important source for non-compliance with them. González Capote et al. (2020) proposes a training plan in the city of Guayaquil that aims to improve the tax knowledge of taxpayers, encourage their continuous training, and improve the tax culture of natural persons not obliged to keep accounting. In the same vein, Chicas (2011), based on the Lorobus system, a practice carried out in Colombia for environmental education, proposes the creation of mobile training units in Guatemala, to strengthen the tax culture of that country.

This mobile unit would be operated by the Superintendency of Tax Administration of Guatemala - SAT. Chicas (2011) proposes that the unit be a vehicle physically and technically structured with an office, training area, and the necessary technological tools to conduct seminars, assist, attend, and train taxpayers, especially those who do not have a tax office in their place of residence. This practice is already exercised by the DIAN in Colombia, where through mobile points, the taxpayer is guided on their tax, customs, and exchange obligations and matters related to RUT, electronic invoicing, Income Help Program for natural persons, among other services, are addressed. In the study conducted in Sonora (Mexico) on tax culture, Morales (2019) emphasizes that tax evasion is common in this country and is due to the absence of fiscal education.

In Mexico, Article 31 of the Political Constitution of the United Mexican States establishes that it is the obligation of Mexicans to contribute to public expenses, both of the Federation, as well as of the Federal District or the State and Municipality in which they reside, in the proportional and equitable manner that the laws stipulate, however, this is not made visible without the concept of tax culture. In this regard, Morales (2019) concludes in his study that non-compliance with tax obligations is due to the fact that, although in Mexico there is a National Program of Fiscal Education, it is not a state policy, and the results of his research show that obligations are not met in some cases due to ignorance and in others due to the perception of the use of resources collected by taxes.

Other authors, like Villasmil and Fandiño (2018), relate tax culture to education and mention that in Latin America, evasion levels are high and that it is important to create awareness from childhood of the culture of contributing, of paying taxes, and thus avoid the child becoming an evader and also the presence of evasion in the country to be greater; his study is based on the tax system of Venezuela and also on Jarach (2004) when he says that for the citizen to pay taxes, they must create awareness of it and that for this to happen depends on several factors such as a moderate tax burden, an equitable tax system, socio-cultural factors based on values and ethics, and a good relationship between the tax administration and taxpayers.

On the other hand, the concept of equity (equality) mentioned by Jarach (2004) in Colombia is a constitutional principle and the factor of improving the relationship between citizen and tax administration has been developed in the DIAN through modernization, where the State through the entity, recognizes the citizen as a client who pays for a service (translated into taxes) and to whom excellent service must be provided. Now, how much has the concept of tax culture permeated in Colombia? Although it is true, there is a marked inclination of the citizen not to comply with their fiscal obligations, it must be recognized that the Directorate of National Taxes and Customs - DIAN, which is the state entity in charge of verifying compliance with tax, customs, and exchange obligations, has initiated a sensitization process through the program "Culture of Contribution".

Law 223 of 1995, by which norms on Tax Rationalization are issued and other provisions are dictated, in its



article 157 states: “Training programs: The Directorate of National Taxes and Customs will develop a pedagogical task directed at schools and colleges to create a tax culture in the country in order to educate the citizen in the constitutional duty to contribute to public charges”. Thus, the DIAN develops a pedagogical task directed at schools and colleges to create a tax culture in the country to educate the citizen in the constitutional duty to contribute to public charges.”

This program, with the use of the slogan “the public is ours,” is developed in two lines, namely: Culture of contribution in school and the NAF Support and Accounting Nuclei. as initiatives of social responsibility where fiscal education policies are strengthened. These spaces generated within the framework of cooperation agreements signed with the country’s university institutions have generated a firm approach between the DIAN and the taxpayer, however, the problem in effect is the uncertainty related to the distribution of resources, in the words of Gutiérrez (2011) people can give part of their resources or profits if they are really invested in the country.

Within this framework, the relationship between the State and the citizen tends to be more honest when it is observed that the transaction is fair rather than coerced. In Kazakhstan, a Central Asian country, the level of tax culture is the basis for tax compliance, and a positive correlation is established between tax culture and the degree of tax communication, with the State being responsible for passive communication regarding tax obligations and also for the efficient use of ICTs, making the communication established between the Government and the citizen in this respect, a crucial source in strengthening tax culture (Kuandykov et al., 2021); hence, the bodies that act as representatives of the State in the task of ensuring compliance with tax, customs, and exchange obligations, must generate spaces for approaching the client (citizen) and become support professionals and not inaccessible officials, whose distance could turn the taxpayer’s intention to comply into resistance to paying the tax.

Likhovski (2010), made assertions about the concept of tax law, is it universal or particular? Is it transferable or not between societies? And basically, refers to whether tax law can easily be transferred from one state to another, and questions whether cultural or ethnic differences influence the success or not of such transfer; then, he mixes the anthropological concept of culture that we explained at the beginning of this article with the tax concept, making an analysis of the history of income tax legislation in Palestine.

In this regard, Livingston (2006) comments that in fiscal matters, any statement of universal rule should be treated with skepticism; secondly, the definition of “culture” must be reviewed in any case that implies a fiscal denotation, as far as the fiscal compliance of the Middle East may be different from that of Europe; and thirdly, the country’s taxation must be established taking into account the country’s fiscal history, where the country’s cultural concept in relation to the tax burden is strongly present.

It is for this reason that the Latin American citizen, when traveling to other countries, whether in North America or Europe, or even on other continents, returns surprised by the services, mobility, transportation, streets, and in general, all those concepts that are the state’s responsibility anywhere in the world, from public bathrooms in perfect sanitary condition to free or minimal cost trains, which are under state tutelage and provide excellent service, and it is when they question the destination of the taxes they pay in their home country and increase their refusal to pay them through tools such as evasion and elusion.

The concept of tax culture is becoming present in all branches, Gómez (2020) shows a correlational analysis between academic-professional training and the tax culture of Marketing and Business Management stu-



dents in Peru. In the study, Gómez (2020) proposes as a general hypothesis that academic-professional training is significantly related to the tax culture of students of the professional school of marketing and business management and demonstrate that the hypothesis is true and that the university should include within its study plan the compliance with the tax obligation to train citizens aware of their responsibilities.

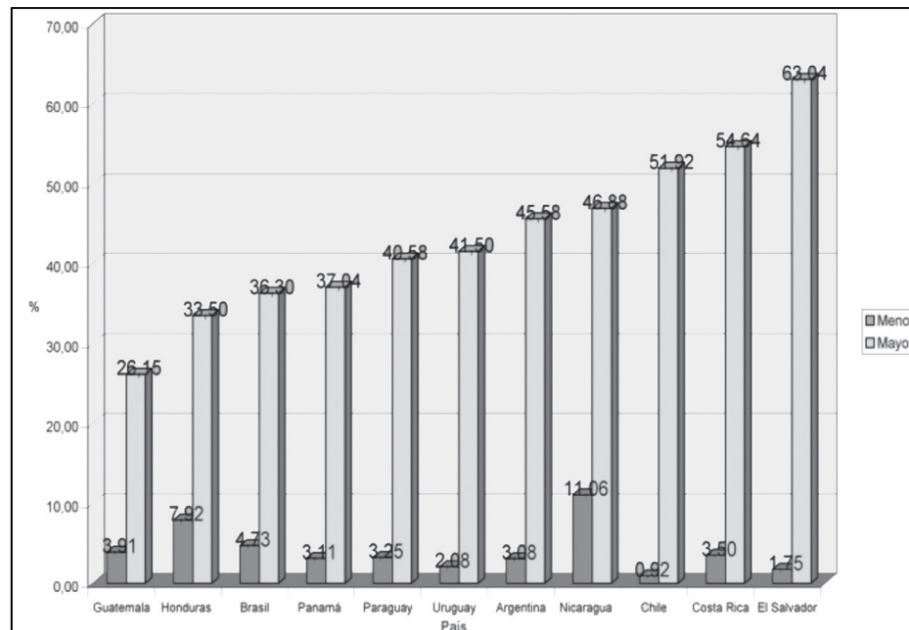
CULTURAL AND SOCIAL FACTORS IN COLOMBIA IN RELATION TO THE PAYMENT OF TAXES

Gutiérrez (2011) and Simanca et al. (2019) analyzes the determinants and differences in fiscal morality in Latin America, more specifically in the citizens of the countries of Central America: Costa Rica, Honduras, Guatemala, El Salvador, Nicaragua, and Panama. Gutiérrez (2011) analyzes a survey conducted by the NGO Latinobarómetro based in Santiago de Chile; the Latinobarómetro applied in 2005 aimed to analyze the variable “how justifiable do you think it is to evade taxes?” to explain the moral level of the surveyed countries.

In Graphic No. 1, it is observed that the country where citizens had the highest fiscal morality was El Salvador with 63.04% and Guatemala obtained the lowest percentage of citizens with fiscal morality, observing a 26.15%. Gutiérrez (2011) concludes that the lack of studies around fiscal morality is because the analysis of tax payment is done from its evasion and not from its voluntary payment. Meanwhile, Torgler (2004) defined fiscal morality as the intrinsic motivation that individuals may have for the payment of taxes, possibly, the payment of taxes can be influenced by cultural and social factors: social stratum, levels of education, family, and even the political management of the country in terms of tax burden and the investment observed from the resources, can affect the citizen’s decision to contribute.

Figure 3.

Proportion of people with higher and lower tax morale.



Source: Gutiérrez (2011, p. 344)

In Colombia, the collection of taxes is materialized in the payment of taxes, fees, and contributions; in the case of fees, tolls, which is the economic value paid for the use of roads where citizens move, is where the direct observation of the investment of resources is possible; in the case of taxes, on the other hand, the Political Constitution of Colombia in article 359 states that “national revenues do not have a specific destination” and excepts from this statement those destined for departments, districts, and municipalities, and those destined for investment and social security, therefore, what is collected by the State enters the public coffers to then be allocated according to the General Budget of the Nation. Taking the stance of Torgler (2004) regarding taxes in Colombia, the investment of resources is not evident, at least not directly, which could influence the tax morale of the citizen.

TAX INCENTIVES AS MOTIVATIONAL ELEMENTS IN THE CULTURE OF TAX PAYMENT

The State motivates compliance with tax obligations through tax incentives in the form of tax discounts and/or audit benefits. The former refers to that economic value expressly approved by the norm and that can be deducted directly from the tax value, and the latter is related to the reduction in the time of authorized inspection with respect to the tax declarations presented by the obligated parties, as long as the requirements mentioned in the norm for such purpose are met.

It is important first to clarify the difference between deduction and discount in the tax field. Deductions are all those expenses (costs and expenses) necessary to fulfill the social object or develop the income-producing activity, these are deducted from the income to obtain a profit (or loss) and subsequently apply the corresponding tax rate to be liquidated. Tax discounts, on the other hand, are applied directly to the tax previously liquidated on the taxpayer's profit, which shows that tax discounts are more beneficial than deductions, without disregarding the latter as particularly important in the accounting exercise. Now, in Colombia, tax discounts can have several objectives apart from the main one, which is to pay less taxes; there are tax discounts to avoid double taxation, as is the case with taxes paid abroad, or to encourage some social activity such as investment in science and technology through university institutions (See Table No. 1)”

Table 1.
Tax Discounts.

Type of Discount	Definition	Legislation
Discount to avoid double taxation: Taxes paid abroad.	Natural and legal persons have the right to deduct from the amount of the Colombian income tax and complementary taxes, the tax paid abroad, whatever its denomination, levied on those same incomes...	Article 254 E.T. Modified by Law 2010 of 2019
Discount to encourage the country's development: Discount for investments made in research, technological development, and innovation.	Persons who make investments in projects qualified by the National Council of Tax Benefits in Science and Technology in Innovation as research, technological development, or innovation, in accordance with the criteria and conditions defined by said Council, will have the right to deduct from their income tax due thirty percent (30%) of the value invested in these projects in the taxable period in which the investment was made.	Article 256 E.T. Modified by Law 2277 /2022
Discounts to contribute to the social function: Discount for donations to non-profit entities belonging to the special regime.	Donations made to non-profit entities that have been qualified in the special regime of income tax and complementary taxes and to the non-contributing entities referred to in articles 22 and 23 of the Tax Statute, will not be deductible from income tax and complementary taxes, but will give rise to a discount on income tax and complementary taxes, equivalent to 25% of the value donated in the year or taxable period.	Article 257 E.T. Modified by Law 2010 of 2019

Source: Own elaboration (2023)



"Regarding the audit benefit, it consists of reducing the time for tax administration to confirm a tax declaration as definitive. To understand this concept, one must refer to Article 714 of the Tax Statute, which states: 'The tax declaration will be considered definitive if, within three (3) years following the deadline for filing, no special requirement has been notified. When the initial declaration has been presented late, the three (3) years will be counted from the date of presentation of this...'; this means that DIAN, which is responsible for verifying compliance with tax, customs, and exchange obligations, has 3 years to verify whether the data contained in the declarations submitted by the taxpayer are accurate or not, exercising the supervisory function granted by Article 334 of the E.T. Now, if the taxpayer, whether a natural or legal person, wishes to reduce this three-year term, they can make use of the audit benefit, which consists of increasing their net income tax in relation to the immediately preceding year, as shown in Table No. 2."

Table 2.*Audit Benefit Art. 689-3 E.T.*

Taxable Year	Increase %	Terms of firmness
2021 and 2022	At least thirty-five percent (35%), in relation to the net income tax of the immediately preceding year	Six (6) months following the date of its presentation provided that: No administrative act has been notified by DIAN. The declaration is duly presented in a timely manner and the total payment is made within the deadlines set by the national government for this purpose.
2021 and 2022	At least twenty-five percent (25%), in relation to the net income tax of the immediately preceding year	Twelve (12) months following the date of its presentation provided that: No administrative act has been notified by DIAN. The declaration is duly presented in a timely manner and the total payment is made within the deadlines set by the national government for this purpose.

Source: Own elaboration (2023)

Article 689 of the E.T. establishes the power of DIAN to grant an audit benefit to encourage voluntary compliance with tax obligations. However, in all cases, both for tax discounts and for the audit benefit, the taxpayer must make a monetary outlay greater than what is regularly budgeted. In the case of supporting investment projects in science and technology, resources must be allocated for those projects, and in the case of the audit benefit, income tax must be increased. In neither case is there an effective discount simply for complying with tax obligations on time. What incentive does this provide for voluntary compliance?

In other countries, such as Ecuador, tax incentives derive from the use of electronic money, which led to a significant increase in its use; from 8% in 2015 to 19% in 2016, increasing operations, mechanisms, and regulations that facilitate flows, storage, and real-time transfers among different economic agents, through the use of electronic, electromagnetic, mobile, fixed devices, smart cards, computers, and others that are incorporated as a result of technological advancement. These incentives apply to Income Tax and VAT in that country, among other benefits (Cajiao, 2017). In Colombia, the electronic money system is similar to banking, but in the Colombian case, what the tax regulations have determined are a series of limitations on the use of cash, as specified in article 771-5 of the E.T.; the tax administration in Colombia, instead of providing effective benefits, aims to control the use of cash, recognizing as deductible in the income tax declaration the payments made by this means up to a certain percentage of the total, the excess cannot be deducted from expenses to settle income tax; this aims to encourage the use of the banking system and reduce the use of cash and increase the tax on financial transactions that exists in the country, known as the four per thousand.

TAX EVASION AND AVOIDANCE

Tax evasion and avoidance are two concepts that are often confused, either voluntarily or involuntarily. On the one hand, evasion is defined as a set of activities aimed at non-compliance with the tax obligation and



therefore the partial or total non-payment of the tax; it is a conscious attitude, and through the use of strategies, aims to hide the real situation of the taxpayer from the tax administration, thus distorting the process of determining taxes (Economic Commission for Latin America and the Caribbean - ECLAC, 1993), affecting economic development and the fulfillment of State functions. Avoidance is defined as the normal reaction of the taxpayer, their resistance to paying the tax, for which they use the same rule or the gaps it presents as a lawful response of the taxpayer to the natural resistance caused by the tax burden (Montecinos, 2004). It is a confusing concept, as its practice is a display of cunning that disguises tax evasion itself; it is evasion with style. The legislator's objective is then to reduce the gaps that give rise to evasive exercise. In Chile, a kind of "general anti-avoidance rule" has been included, allowing the Internal Revenue Service of this country to analyze whether the legal situations presented by taxpayers in reorganization and similar can be classified as elusive transactions (Matus, 2017). Tax havens significantly influence this exercise as a mechanism for tax evasion and avoidance. According to the Royal Spanish Academy – RAE, a tax haven is defined as a "Country or territory where the absence or scarcity of taxes and financial controls applicable to foreign residents constitutes an effective incentive to attract capital from abroad." One of the most important characteristics of tax havens is that they exempt non-residents from the tax regime, making them more attractive to resource owners (León-Trujillo & Vélez-Brito, 2022). While the Organization for Economic Cooperation and Development – OECD lists countries, Colombia lists them in article 1.2.2.5.1 of decree 1625 of 2016, which develops article 260-7 of the tax statute, some of them are: Antigua and Barbuda, Territorial Collectivity of Saint Pierre and Miquelon, State of Brunei Darussalam, State of Kuwait, State of Qatar, Independent State of Western Samoa, Grenada, and Hong Kong, among others. In Colombia, the recent tax reform indicates mechanisms to combat tax evasion and avoidance, related to permanent establishments, national source income, in-kind income, annual declaration of assets abroad, among others. However, the phenomenon of evasion persists even in municipal taxes, as the use of resources in the municipality is not clear, leading to the route of evasion. In 2016, the mayor's office of Santiago de Cali in Colombia identified a total of 1,496 omissions and 2,000 inaccurate declarations for the Industry and Commerce tax of the municipality, which led the municipal tax administration to liquidate the tax through administrative acts, denoting a high rate of evasion (Fernández et al., 2018).

TAX CULTURE AS AN INFLUENCING ELEMENT IN TAX EVASION AND AVOIDANCE

Colombia is a country with low tax collection and distribution, and one of the reasons is the lack of tax morale. Vernazza and Prado (2021) in a study on the estimation of the tax gap in Colombia, considers that tax education, collection strengthening, technical and technological revitalization, and the fine-tuning of tax design and strengthening of tax administration should be taken into account to increase the percentage of compliance with tax obligations; these elements are gradually structured in the development of contribution culture programs. With the development of a tax culture within the framework of legality and ethics from school and enhancing it in universities, from any area of knowledge, it could be possible to reduce the levels of evasion and avoidance in the country. Cabrera et al. (2021) states that in Peru, tax evasion is reinforced by the lack of tax culture in the country; his non-experimental study is based on medical professionals in the city of Trujillo (Peru), and it shows that 72% of the surveyed doctors have a low level of tax culture and that 65.57% show high levels of tax evasion (Table No.3), indicating that the greater the lack of tax culture, the higher the level of evasion by the citizen. This study is interesting as it evaluates the sector of medical professionals, who obtain considerable income due to their practice in human health, indicating that if they show prominent levels of evasion, a good percentage of the income needed by Trujillo (Peru) for its economic development is diluted in this sector. Cabrera et al. (2021) indicates that the tax system is not efficient and that strategies should be implemented to raise awareness of tax payment in the country."



In Panama, as in Colombia, the concept of tax culture has been mentioned. González (2020) conducted a non-experimental study where he surveyed a group of 150 people aged between 18 and 70 years, providing them with the concept of tax culture. He concluded that this concept should be included in education from an early age and indicates that the responsibility for tax education lies with the State. In a country like Panama, which is a strong reference for tax avoidance as it is considered a tax haven, including a concept of voluntary tax contribution is a significant challenge.

Table 3.

Comparison of the scores obtained from tax culture and tax evasion in the fourth category incomes, medical sector, Trujillo – Peru 2019.

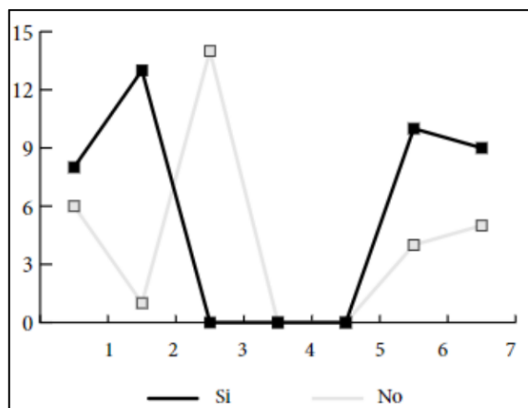
Niveles	Cultura Tributaria		Evasión Tributaria	
	F	%	F	%
Bajo	44	72%	7	11,48%
Medio	12	20%	14	22,95%
Alto	5	8%	40	65,57%
TOTAL	61	100%	61	100,00%

Source: Cabrera et al. (2021, p.7)

Now, in this article, the concept of education has been related to culture, and in the same sense, education is related to tax culture. Chía Suárez et al. (2018) conducted a situational analysis of tax education in primary basic education, where it was observed that 93% of the surveyed teachers consider that the concept of tax culture should be included from an early age so that the child is formed to face responsibilities as a citizen. However, only 57% of them reported including the concept of taxes at some point in the classroom. Chía Suárez et al. (2018) proposes tools that teachers can apply for tax education in early childhood, such as the educational game “Magnatus”, where children play being entrepreneurs. He concludes that tax education (culture) should be generated from an early age and should not only include the school but also the parents, as it should be a collaborative effort involving all actors. This practice contributes to reducing levels of evasion and avoidance in this sense.

Figure 4.

Situational Analysis of Tax Education in Primary Basic Education.



Source: Chía Suárez et al., (2018, p.20).

TAX SANCTION REGIME

In Colombia, there are distinct types of sanctions determined by the tax regulations according to the punishable act. Some are related to the content of the tax declaration, and others to ancillary obligations to the substantial obligation to pay, such as: presenting information, keeping accounting records, invoicing, among others that are described below in

Table 4.
Colombian Tax Sanction Regime. Title III E.T."

Tax Declarations	Information and Invoice Issuance	Accounting and Business Closure	Others
Late Filing	Failure to Send Information	Failure to Keep Accounting or Not Doing So Properly	To public accountants
Failure to Declare	Sending Information with Errors	Business Closure	To notaries and other officials
Correction and Arithmetic Correction	Obligation to Issue Invoices	Administrators and Legal Representatives Obligation to Register and Update the RUT (Tax Identification Registry)	To entities authorized for collection
Inaccuracy			To DIAN officials

Source: Own elaboration (2023)

The most burdensome sanctions contained in the National Tax Statute are the Penalty for Inaccuracy (Article 647 E.T.) and the Penalty for Failure to Provide Information (Article 651 E.T.). The former penalizes acts related to inaccurate or incorrect values included in tax declarations, whether due to actions related to the omission of income, inclusion of non-existent or inaccurate costs or expenses, or figures intended to reduce the balance payable or increase the balance in favor. Any of these acts subjects the offender to a penalty equivalent to one hundred percent (100%) of the difference between the balance payable or balance in favor determined in an administrative act issued by DIAN. Additionally, in this same vein, there are penalties for special cases that can reach up to two hundred percent (200%) of the higher tax value in cases of omission of assets or inclusion of non-existent liabilities, or one hundred and sixty percent (160%) in cases of tax abuse according to Article 869 of the Tax Statute (Article 648 E.T.)

In all countries, there is some penalty system for tax evaders. In Panama, for example, which has been considered a tax haven for many years, the General Directorate of Revenue (DGI), the entity responsible for efficiently and effectively collecting taxes in that country, has the authority to apply different types of sanctions: to the obligation to declare income, keep accounting or not keep it up to date, sanctions to public officials, and other punishable acts. The amounts range from One Hundred Balboas (B/.100.00) to Ten Thousand Balboas (B/.10,000.00), depending on the sanctioned act, which in Colombian pesos is equivalent to sanctions from four hundred and five thousand pesos (\$405,000.00) to forty million five hundred and sixty-two thousand pesos (\$40,562,000.00) approximately. These amounts are low compared to the sanctions in Colombia, which range from \$424,000.00 to \$318,090,000.00 (Colombian pesos, year 2023) for the case of the penalty for failure to send information under Article 65 of the E.T.



DISCUSSION

Colombia has gone through different forms of government, each from their parties and/or political beliefs. However, what citizens observe is an inadequate administration of resources, which generates distrust and does not tend to create a contributory culture without resorting to coercive action through sanctions. Therefore, several factors can be identified that influence the generation of the country's tax culture: The lack of culture in the organizational context, especially in tax payment, either due to the tax uncertainty that exists in the country or the lack of trust of the taxpayer in the proper allocation of the collected taxes. The fiscal mismatch caused by tax reforms, increasingly inclined towards middle-income individuals, which have become part of the changes in government.

Tax discounts are related to the financial capabilities of the taxpayer; however, lower-income taxpayers do not have the financial muscle to make extraordinary investments as they struggle daily to stay afloat. The payment of taxes is crucial in the economic development of a country, as they support all the social functions related to health, education, housing, security, welfare, and other citizen rights that the State must provide. Without taxes, there are no resources, and without resources, there is no growth. However, this growth should not be at the expense of the contributing citizen.

José Andrés Romero, the director of DIAN, states in the book published by this state entity called: "DIAN Transformation for a more honest Colombia," that DIAN's general task is to change all the dishonest situations that occur in the country, as a country lacking transparency does not progress, given that entrepreneurship must be governed by the principles of legality and equity (DIAN, 2020).

At DIAN, the area of economic studies is responsible for measuring and studying the scourge of evasion. In the Monthly Collection Report of September 2022 published by DIAN, there is clear evidence of the fight against evasion and smuggling by the Tax Administration, with collection and audit actions, which, while they managed to increase collection and the effectiveness of the entity's work in reducing this scourge, the amounts turned over by taxpayers for penalties and late interest also constituted a source of income for the country, regardless of the economic situation of the sanctioned, collecting in the months from January to September 2022 \$3,693,534 million pesos, corresponding to actions for control of omissions and inaccuracy (DIAN, 2022. Page 8).

CONCLUSION

At the end of this article, we can conclude that there is a marked tendency towards tax evasion and avoidance in Colombia, as well as in other Latin American countries and around the world. Tax Administrations should direct their efforts towards fiscal education and generating a tax culture in compliance with obligations, as indeed began in Colombia with the Contribution Culture project. However, these efforts will be fruitless if they are not accompanied by a strong fight against corruption among those who lead the country's direction. The tendency of citizens who possess significant capital is to invest it or take it out of the country, where, according to their perspective, "taxes are noticeable," or in other cases, to seek evasion or avoidance strategies that protect the capital or allow its growth but failing to comply with the substantial obligation of paying taxes as a source of state revenue.



Undoubtedly, in Colombia, the DIAN's auditing work has been strengthened since the incorporation of MUISCA in 2005, reducing the taxpayer's margin to evade or avoid their tax obligation. In an ideal world, the State should complement a good contribution culture program with a table of tax incentives or benefits that can be effectively evidenced without the need for additional expenditures to those already made for the income-generating activity. A tax discount is not a benefit if, to access it, I must transfer money to entities indicated by the State and under the conditions it determines; the audit benefit should not be based on paying more taxes due to the fear generated by the tax administration of a possible review of the documents supporting my tax reality. Ideally, pedagogical strategies should be generated to avoid resorting to the coercive action of the State, but to the good attitude of the citizen in fulfilling their obligations, as well as exercising their rights.

In concluding the writing of this article, it can be concluded that to reinforce the concept of tax culture, the following points must be addressed: one. The lack of culture in the organizational context, especially in tax payment, is countered with efficient demonstrations of the fight against corruption. 2. If the State abandons its marked interest in taxing middle-income individuals, instead of having large companies contribute honestly with tax payments, citizens will pay what is fair without any coercion. 3. By generating truly effective tax discounts where it is observed that the taxpayer will pay less if they comply with their obligations promptly and clearly, without having to make extraordinary expenditures, tax collection and its timeliness will increase. Lastly, and most importantly, 4. tax culture must go hand in hand with education, with the school. If you teach a child with civic principles, they will be a good person who will contribute to public burdens without resorting to shady strategies such as evasion and avoidance, as that child being educated now will be the future leader of the country and will be an official respectful of the law and devoid of malicious intentions that are detrimental to the country's economy and its citizens.



References

- Almond, G. & Verba, S. (1970). *La cultura Cívica*. Fundación FOESSA.
- Andrade Donoso, M. S. & Cevallos Caza, K. G. (2020). Cultura tributaria en el Ecuador y la sostenibilidad fiscal. *REVISTA ERUDITUS*, 1(1), 49–62. <https://doi.org/10.35290/re.v1n1.2020.290>
- Armas, M. E. & de Eizaga, M. C. (2009). Educación para el desarrollo de la cultura tributaria. *REDHECS: Revista electrónica de Humanidades, Educación y Comunicación Social*, 4(6), 141-160.
- Asprilla Panesso, E. S. , Lozano Urrego, H. Y. , Bechara Palacio, R. , & Emiro Ledezma, R. . (2019). El medio ambiente como víctima del conflicto armado en el departamento del Choco?. *Pensamiento Americano*, 12(23). <https://doi.org/10.21803/pensam.v12i22.251>
- Bonet-Martí, J. & Ubasart-González, G. (2021). Conflicto territorial y cambios en la cultura política: Cataluña-España. *Athenea Digital*, 21(3), e2989. <https://doi.org/10.5565/rev/athenea.2989>
- Bruner, J. (2013). *La educación, puerta de la cultura*. Machado Grupo de Distribución.
- Caballero Palomino, S. A., Lozano Parra, J. S., Cruz Cadena, K. Y., & Parra Cárdenas, A. (2022). Aplicación del fuero materno en los contratos de maternidad subrogada: retos y desafíos en el ordenamiento jurídico colombiano. *Pensamiento Americano*, 15(29), 139-151.
- Cabrera, M., Sánchez-Chero, M., Cachay, L. & Rosas-Prado, C. (2021). Cultura tributaria y su relación con la evasión fiscal en Perú. *Revista de Ciencias Sociales* 27(3). 204-218.
- Cajiao Ortega, M. E., Calvache Pintado, P. & Montalvo, C. (2017). El dinero electrónico y los incentivos tributarios en el Ecuador. *Revista Publicando*, 4(12-2), 563-572.
- Cárdenas Páez, A. (2011). Piaget: lenguaje, conocimiento y Educación. *Revista Colombiana de Educación* (60), 71-91.
- Chía Suárez, M., Gómez Quiñónez, J. A., López Ruíz, C. & Porras Mejía, S. A. (2018). Hacia el fomento de la cultura tributaria desde la primera infancia. *Revista Activos*, 16(30), 19-54.
- Chicas Zea, M. (2011). "PROPUESTA PARA CREAR UNA UNIDAD MOVIL DE CAPACITACIÓN COMO HERRAMIENTA PARA EL FORTALECIMIENTO DE LA CULTURA TRIBUTARIA EN GUATEMALA. (Tesis de maestría, Universidad de San Carlos de Guatemala). http://www.biblioteca.usac.edu.gt/tesis/03/03_3703.pdf
- Citarella Espinoza, M. & Insignares Blanco, E. (2021). La auditoría financiera y su proyección en la rentabilidad de las empresas. *Ad-Gnosis*, 10(10), 141-149. <https://doi.org/10.21803/adgnosis.10.10.475>
- Cújar Vertel, A., Ramos Paternina, C. D., Hernández Riaño, H. E. & López Pereira, J. M. (2013). Cultura organizacional: evolución en la medición. *Estudios Gerenciales*, 29(128), 350-355.
- DIAN. (2022, septiembre). Informe de recaudo, lucha contra la evasión y el contrabando. Ministerio de hacienda y crédito público. <https://www.dian.gov.co/impuestos/InformeMensualRecaudo/9-Informe-Mensual-Recaudo-Septiembre-2022.pdf>
- Dirección de Impuestos y Aduanas Nacionales – DIAN (2020, noviembre). Transformación DIAN por una Colombia más honesta. Panamericana formas e impresos. Primera Edición.
- Durán, R. (2009). Aportes de Piaget a la educación: hacia una didáctica socio-constructivista. *Dimensión empresarial*. 7(2). 8-11.
- Elías, M. E. (2015). La cultura escolar: Aproximación a un concepto complejo. *Revista Electrónica Educare*, 19(2), 285-301.



- Fernández, S., Herrera, E. J., Tamayo, L., Rojas, A. & Martínez, L. (2018). La evasión de impuesto como variable económica negativa para Colombia. *Espacios*, 39(50). 2. <https://www.revistaespacios.com/a18v39n50/a18v39n50p02.pdf>
- Garizabal, L., Barrios, I., Bernal, O. & Garizabal, M. (2020). Estrategias de planeación tributaria para optimizar impuesto de los contribuyentes. *Revista espacios*, 41(8), 1-8.
- Gómez Chipana, E. (2020). Análisis correlacional de la formación académico-profesional y cultura tributaria de los estudiantes de marketing y dirección de empresas. *Universidad y Sociedad*, 12(6), 478-483.
- González Capote, D., Tartabull Contreras, Y. & Barzola Pinto, K. R. (2020). Propuesta de un plan de capacitación para consolidar la cultura tributaria en la ciudad de Guayaquil. *Revista Metropolitana de Ciencias Aplicadas*, 3(2), 131- 137.
- González, C. M. (2020). La cultura tributaria como medida para elevar los niveles de recaudación de impuestos en Panamá. *Revista FAECO sapiens*, 3(2), 01-12.
- Gutiérrez, A (2011). Determinantes y diferencias en la Moral Fiscal en Centroamérica. Un análisis desde el Latino-barómetro 2005. *Ciencias Económicas* 29(1). 341- 356.
- Jarach, D. (2004). *Finanzas Públicas y Derecho Tributario*. Abeledo-Perrot Editores.
- Kuandykov, N., Abil, Y., Utepov, A., Nurkey, A. & Abenova, A. (2021). Investigating the relationship between tax culture and tax communication in kazakhstan. *Problems and Perspectives in Management*, 19(3), 197-210. doi:10.21511/ppm.19(3).2021.17
- León, A. (2007). ¿Qué es la educación? *Educere*, 11(39), 595-604. http://ve.scielo.org/scielo.php?script=sci_arttext&pid=S1316-49102007000400003&lng=es&tln-g=es.
- León-Trujillo, E. S. & Vélez-Brito, Á. P. (2022). Los Paraísos Fiscales: Una alternativa a gran escala que solventa la Evasión Fiscal. *Dominio de las Ciencias*, 8(2). 777-793.
- Ley 2010 de 2019. (2019, 27 de diciembre). Congreso de la República de Colombia. Diario Oficial 51.179. https://www.redjurista.com/Documents/1_2010_de_2019.aspx#/
- Ley 223 de 1995. (2020, 20 de diciembre). Congreso de la República de Colombia. Diario Oficial No. 42.160. http://www.secretariassenado.gov.co/senado/base-doc/ley_0223_1995.html
- Ley 2277 de 2022. (2022, 13 de diciembre). Congreso de la República de Colombia. Diario Oficial No. 52.247. http://www.secretariassenado.gov.co/senado/base-doc/ley_2277_2022.html
- Likhovski, A. (2010). Is tax law culturally specific? lessons from the history of income tax law in mandatory palestine. *Theoretical Inquiries in Law*, 11(2), 725-763. doi:10.2202/1565-3404.1257
- Livingston, M. A. (2006). From milan to mumbai, changing in tel aviv: Reflections on progressive taxation and "progressive" politics in a globalized but still local world. *American Journal of Comparative Law*, 54(3), 555-586. doi:10.1093/ajcl/54.3.555
- Matus Fuentes, M. (2017). La elusión tributaria y su sanción en la Ley N 20.780: Hacia un concepto de negocio jurídico elusivo. *Ius et praxis*, 23(1), 67-90.
- Mera, J. O. (2012). INCP. <https://www.incp.org.co/incp/document/planeacion-tributaria/>
- Montecinos Araya, J. (2004): La potestad del Servicio de Impuestos Internos en materia de recalificación de los contratos. La línea divisoria entre la evasión y la elusión tributaria. *Revista de Derecho Universidad de Concepción* (72), 351-356.
- Morales Tostado, M. del C., Echeverría Rodríguez, L. G., Huerta Urquijo, B. E., & Quinto Lorenzo, E. L. (2019). Cultura Tributaria en Hermosillo, Sonora, México. *BIOLEX REVISTA JURIDICA DEL DEPARTAMENTO DE DERECHO*, 11(21), 63-80. <https://doi.org/10.2202/1565-3404.1257>



org/10.36796/biolex.v21i0.157

Ocampo Lozano, M. (2014). Sistema bancario colombiano y la educación financiera. Casobanco Davivienda. *Aglala*, 5(1), 143-167. <https://doi.org/10.22519/22157360.757>

Parra, A. (2014). Planeación Tributaria y organización Empresarial. Bogotá, México D.F, Buenos Aires, Caracas, Lima, Santiago: Legis.

Reátegui, M. A. (2016). Importancia de la cultura tributaria en el Perú. *Revista de Investigación de Contabilidad Accounting power for business*, 1 (1), 1-18.

Sandoval Reyes, R., Roncallo Pichón, A. J., Barrientos Pérez, E. & Landazury Villalba, L. F. (2020). Incremento en la base gravable del impuesto predial en el distrito de Barranquilla en 2018. *Ad-Gnosis*, 9(9), 59-68. <https://doi.org/10.21803/adgnosis.9.9.437>

Schwartz, H. & Davis, S. (1981). Matching Corporate Culture and Business Strategy. *Organizational dynamics*, summer 10(1) 30-48.

Simanca, J. A., Araujo, D. S., Porras, L. S., Viloria, M. R., Morales, C. B., & Guiliany, J. G. (2019). Efectos de los Stakeholders sobre el turismo sostenible en Barranquilla. *Liderazgo Estratégico*, 9(1), 82-96.

Soria, R. (2008). *Emprendurismo, cultura, clima y comunicación organizacional y su aplicación a la pequeña y mediana empresa en la Zona Metropolitana de Guadalajara, México*. Universidad de Málaga.

Torgler, B. (2004). *Tax Moral, trust and corruption: empirical evidence from transition countries*. Working Paper. Center for Research in Economics, Management and Arts.

Urrutia Guevara, J. A. & Yancha Villacis, M. M. (2021). Ecuador y la cultura tributaria como fuentes de ingreso fiscal. *Revista Universidad y Sociedad*, 13(S1), 408-415.

Vernazza Páez, Á. A. & Prado Domínguez, A. J. (2021). Estimación de la brecha tributaria para Colombia:

medidas proactivas para su reducción. *Investigación económica*, 80(317), 58-81. <https://doi.org/10.22201/fe.01851667p.2021.317.78421>

Villasmil, M. & Fandiño, Y. (2018). Cultura tributaria en la educación: Un estudio fenomenológico hacia una interpretación compleja. *Opción: Revista de Ciencias Humanas y Sociales*, (34), 1620-1652.

Vite Cevallos, H., Carvajal Romero, H., Gutiérrez Jaramillo, D., Borja Herrera, A., & Feijoo González, E. (2021). Factores claves para el fortalecimiento de la cultura tributaria en Pymes de la ciudad de Machala. *Revista Universidad y Sociedad*, 13(5), 463-471. http://scielo.sld.cu/scielo.php?script=sci_arttext&pid=S2218-36202021000500463&lng=es&tlng=es.

