Державна статистика України. Електронний сайт. Доступ
2009 2010 2011 2012 2013
26,99 25,86 16,42

Таблиця. Витрати бюджету внаслідок надання податкових пільг та їхня вплив на загальну суму податків на прибуток

<table>
<thead>
<tr>
<th>Напокінь</th>
<th>2009</th>
<th>2010</th>
<th>2011</th>
<th>2012</th>
<th>2013</th>
</tr>
</thead>
<tbody>
<tr>
<td>Сума наданих пільг з податку на прибуток, млрд грн</td>
<td>30,65</td>
<td>26,99</td>
<td>27,55</td>
<td>26,86</td>
<td>37,31</td>
</tr>
<tr>
<td>Темп приросту податкових пільг, %</td>
<td>-11,94</td>
<td>76,20</td>
<td>46,50</td>
<td>44,24</td>
<td></td>
</tr>
<tr>
<td>Питома вага пільг в загальній сумі податків на прибуток, %</td>
<td>92,75</td>
<td>66,87</td>
<td>86,31</td>
<td>46,45</td>
<td>68,77</td>
</tr>
<tr>
<td>Браття бюджету внаслідок надання податкових пільг, млрд грн</td>
<td>2,02</td>
<td>2,09</td>
<td>15,40</td>
<td>15,10</td>
<td>16,42</td>
</tr>
<tr>
<td>Капітальні інвестиції, які здійснюються за рахунок власних коштів підприємств, млрд грн</td>
<td>127,43</td>
<td>114,96</td>
<td>152,27</td>
<td>175,42</td>
<td>157,12</td>
</tr>
<tr>
<td>Темп приросту капітальних інвестицій, %</td>
<td>-20,98</td>
<td>42,57</td>
<td>32,45</td>
<td>15,19</td>
<td>-10,43</td>
</tr>
</tbody>
</table>

Джерело. Склад автор на основі даних Державної служби статистики України та Державної фіскальної служби України.

Ще одним інструментом податкового регулювання в державі є офшорні зони чи вільні економічні зони (ВЕЗ). Це території, на яких створюється сприятливий митний, податковий та інвестиційний клімат з метою залучення інвестицій для розвитку підприємницької діяльності. Вільні економічні зони відносяться до обмеженій території, коли держава не може забезпечити повну відкриткість ринку для певної діяльності. У міжнародній практиці такі території з особливим сприятливим економічним кліматом називають офшорними зонами.

В Україні вільні економічні зони створюються на підставі Закону України "Про загальні засади створення і функціонування спеціальних (вільних) економічних зон" від 13 жовтня 1992 р. [3]. Цей закон визначає загальноправові умови та порядок створення, ліквідації, функціонування таких зон, їх статус і порядок регулювання діяльності. Але створювані вільні економічні зони можна тільки після прийняття відповідного закону щодо кожної з них, якіх визначаються статус території, строки дії цієї зони. Вільні зони, не дотримуючись умов та порядків створення, можуть втратити статус території.

Вільними економічними зонами в Україні є вільні економічні зони, які можна визначати на основі встановленої території, статусу та функціонування таких зон.

ІНЖЕНЕРНА НАУКА

Темп податкових пільг

Прибуток

Темп приросту податкових пільг

Втрати внаслідок прибутку

112

Серія економічна

113


Темах: Л.П. Особенности применения методов и способов налогового регулирования предпринимательской деятельности

Раскрыто экономическое содержание налогового регулирования как составляющей государственного регулирования экономики и обосновано значение методов и способов налогового регулирования в развитии предпринимательской деятельности, в частности таких как налоговый инвестиционный кредит, налоговые каникулы, офшорные зоны и др. Исследована роль налоговых льгот в системе налогового регулирования предпринимательства как одного из самых прогрессивных способов стимулирования развития предпринимательской деятельности и аналитизирована эффективность использования налоговых льгот в Украине. Отражено состояние использования свободных экономических зон в Украине в содействии привлечения дополнительных инвестиционных ресурсов для развития экономики.

Ключевые слова: налоговое регулирование, налоговые льготы, налоговый инвестиционный кредит, налоговые каникулы, офшорная зона.

Тематика: Some Features of the Application of Methods and Techniques of Tax Regulation of Business

This paper discloses the economic content of tax regulations as part of state regulation of the economy and reasonable value techniques and methods of fiscal management in business development, in particular such as investment tax credit, tax holiday, offshore and others. The role of tax incentives in the tax regulation of business as one of the most progressive ways of stimulating business development is investigated. The efficiency of tax incentives in Ukraine is analysed. The conditions of the use of free economic zones in Ukraine in facilitating attraction of additional investment resources for economic development are highlighted.

Keywords: tax regulations, tax benefits, investment tax credit, tax holiday, offshore zone.


THEORETICAL CONCEPTUALIZATION OF THE NOTION "FINANCIAL RESOURCES"

The economic content of financial resources that are in the national and local authority is defined. All the possible sources of their formation are structured. The essence of financial resources of communal enterprises ownership, peculiarities of their accumulation and potential use are investigated. Approaches to understanding of enterprises' financial resources meaning are studied. Possible sources of their accumulation as well as systematic and non-systematic factors of their formation are described and grouped. A comprehensive definition of financial resources as an economic category based on the systematisation of approaches to its interpretation on the micro and macro levels is suggested.

Keywords: financial resources, money funds, the budget, economic relations, communal property enterprises.

Problem. Financial resources are viewed as the material realization of financial relations between all the subjects of the economic system. They are formed in the process of gross national product distribution as income and money savings, and as an integral part of economic processes at national, entrepreneurial and private levels. Therefore, financial resources are capable of performing the role of an indicator of...
country’s economy financial state and at the same time acting as a source of its development in the processes of expanded reproduction, material incentives, the satisfaction of social and other needs of society.

Researching the concept of financial resources, the scholars mainly define it in the context of money funds managed by the state, organizations, enterprises, entities and people. The essence and role of financial resources is studied on the level of state and enterprises. The notion of government finance has been researched by many local researchers, including: Andriushchenko V., Bazylevych V., Bukovina S., Vasylyk O., Diachenko Y., Efimenko T., Zaichykova V., Kirilenko A., Kravchenko V., Lunina I., Londar S., Oparin V., Pavliuk K., Polozenko D., Sokolovskaia A., Fedosov V., Chugunov I., Yuriy S. and others. The research of financial resources at micro level has been made by such scholars as Bilyk V., Bandurka A., Buria L., Hrynkova V., Ziatkovska L., Kireitsev G., Krupka M., Laktionova L., Oparin V., Pavlov A., Poddierohin A., Filimonenkov O., Khachatryan S. and others. For a complete definition of financial resources it is expedient to research their meaning for different subjects of economic relations and synthesize scientific approaches on the macro and micro levels.

The aim of the present research is to systemize the scientific approaches to the notion and role of financial resources from the standpoint of the different subjects of economic relations and for the national economy as a whole.

Results. Financial resources as a comprehensive component of all the economic processes differ in methods of creation, usage and economic entities they are managed by. Consequently, at the macro level they are functioning under the public authorities’ control whereas at the micro level they are operated by the companies of all forms of ownership and activities, as well as the population (deposits and savings).

Most researchers define public financial resources as money funds, which are created in the process of distribution, redistribution and the use of gross domestic product in the course of a certain period of time and are used to provide continuity of expanded reproduction and meeting other social needs [1, 2].

Other scientists view public financial resources as the system of economic relations concerned with the formation, distribution and use of centralized and decentralized money funds, in order to give state the ability to carry out its functions [3]. They are accumulated from the following sources (pic. 1): state and local budgets; targeted state funds; government financial institutions (national bank, state insurance authorities, public credit institutions); the finance of companies and organizations of state and communal ownership. Budgets are the main source of accumulating the financial resources. The amounts and features of the formation of public financial resources directly depend on the elements of government revenue and expenditure, including: government revenue from economic activities, revenues from corporate income tax, the growth of public debt.

The amount of financial resources can be increased by the growth of state revenues, which according to the methods of fundraising are divided into:

1) tax revenues;
2) non-tax revenues;
3) income from operations with capital (proceeds from sale of capital, government stock of goods, land and intangible assets)
4) official transfers (grants, subsidies);
5) trust funds (Pension Fund, Social Insurance Fund, Invalids Social Protection Fund and others).

The lion’s share of budget revenues of the Pension Fund and Social Insurance Fund is provided by contributions, charged on the payroll fund, and paid by employers on behalf of employees and by self-employed persons [4, p. 129]. Investment income is the potentially effective source of accumulating financial resources of these funds. It can be received from the use of temporary free money, including money from reserve fund. Invalids Social Protection Fund, unlike the already mentioned Funds, has no financing sources of its own and is maintained by the state budget.

Local financial resources are generated in the process of distribution and redistribution of gross domestic product and are directed to use for economic and social development of administrative units. The main area of their use is funding of social infrastructure and local economy. The system of local financial resources includes resources of local budgets; resources of municipal enterprises and organizations; resources of local funds; resources of local loans.

Substantial amount of local financial resources is accumulated by obtaining budget revenues. The sources of local budgets are:

1) revenues from the municipal sector;
2) income from municipal property and municipal services;
3) redistribution of revenues of enterprises and individuals through taxes;
4) involvement of local loans.

According to fundraising methods, local budgets financial resources are divided into: tax revenues; non-tax revenues; income from capital transactions; transfers. Tax revenues are the main basis of budget revenues. The share of tax revenues in the structure of local budgets is more than 50 % [5].

Non-tax revenues have a smaller part in the local budget revenues. Their share ranges from 10 % up to 30 %. Depending on the types and methods of mobilization, non-tax revenues are combined into five groups [6, p. 127]:

1) income from property and business;
2) administrative charges and fees, income from non-commercial and incidental sales;
3) revenues from fines and financial penalties;
4) other non-tax revenues;
5) own revenues of budgetary institutions.

Due to such a proportion of tax and non-tax revenues, the practice of local governments shows that the expansion of the revenue base of the region, that would be used to fund economic and social development, can be achieved by a wider implementation of local taxes and fees.

In view of such essential features of public finance as the role of GDP as their main source and the participation of all the subjects of economic relations within the country in the process of their formation, the following definition can be provided: public financial resources is a system of funds accumulated in the course of formation, distribution and use of gross domestic product, and used in the process of economic relations between the state, enterprises and people implementation, in order to provide state with the ability to carry out its functions.

The financial resources of the municipal sector deserve a more in-depth consideration. They form one of the main incoming flows of own revenues for local budgets. Municipal sector includes business entities of communal ownership, which provide public services for people's life and spiritual development, such as: public utilities, education, culture, medicine, sport and recreation.

A. Krylenko considers financial activities of business entities of communal ownership to be a system of monetary relations, which arise in the process of formation and use of financial resources to ensure the effective functioning of the reproductive process and social sphere of the country in the process of their formation, the following definition can be provided:

Public financial resources is a system of funds accumulated in the course of formation, distribution and use of gross domestic product, and used in the process of economic relations between the state, enterprises and people implementation, in order to provide state with the ability to carry out its functions.

The financial resources of the municipal sector deserve a more in-depth consideration. They form one of the main incoming flows of own revenues for local budgets. Municipal sector includes business entities of communal ownership, which provide public services for people's life and spiritual development, such as: public utilities, education, culture, medicine, sport and recreation.

Some scholars narrow the meaning of the financial resources of business entities of communal ownership to a system of monetary relations, which arise in the process of formation and distribution of gross domestic product in the process of forming and using centralized and decentralized money funds at the local level to meet population utility needs [7, p. 449]. As financial resources of business entities of communal ownership are the part of local finance, they fill local budgets with revenues from their operations: their own revenues; tax on their profit; revenues from the sale of property and land that are in communal ownership; rent for objects of communal property; dividends on their securities.

Financial resources of business entities of communal ownership have to be accumulated under the legislation regulating the activities of any entities in Ukraine. Accumulated resources are being formed from own and borrowed funds. The Budget Code of Ukraine stipulates that own revenues include payment for their services and other possible income. The revenue from providing statutory services is permanent and requires budget planning. Financial resources generated from other sources of own revenues are not permanent and their budget planning is required in one case only – if they were planned by agreements or legally by decisions of the Cabinet of Ministers of Ukraine.

The revenue from products sale or services provision is of major importance in the whole amount of revenue streams of business entities of communal ownership. It depends on the number of products that can be sold and prices for them. Pricing for the services of business entities of communal ownership requires proper study and analysis. Effective calculation of prices makes it possible to cover the costs of goods and services and provide intensive accumulation of financial resources. In accordance with approaches to defining public financial resources, financial resources of business entities of communal ownership can be defined as a system of economic relations arising in the process of formation and use of gross domestic product in order to ensure efficient implementation of the functions of business entities of communal ownership to carry out support and development of social infrastructure.

The researchers of the financial resources at the enterprise level have established three approaches to their essence: 1) financial resources are expressed in cash money; 2) financial resources are expressed in the form of funds; 3) a combination of two aforementioned approaches. The main difference between money and fund forms of financial resources is the necessity of the latter to have a purpose of use. Company uses cash money to meet obligations to the budget, off-budget funds, banks and insurance companies. And the financial resources in the form of fund are involved in business activities. If the amount of company's funds prevails over the amount of money, it indicates the presence of financial obligations.

O. Poddieriohin defines financial resources as money that is available to the company and include money funds and money not used in fund form [9, p. 10].

V. Oparin holds that financial resources express the amount of money, that is channeled into fixed and current assets of the company. The researcher suggests to use financial resources to analyze and evaluate the financial potential of enterprises, since they indicate the ability of the enterprise to expenditure for profit [10, p. 79].

According to L. Ziatkovska, financial resources of enterprises are understood as money with the purpose of use generated in the processes of distribution and redistribution of gross domestic product, created at the given enterprise, which it owns or manages on the property or full economic management rights and uses for statutory requirements [11, p. 149]. The lack of a common approach to the definition of the financial resources at the enterprise level in the aforementioned researches suggests a mismatch in understanding of market economy functioning principles in Ukraine. However, consideration of the given notion from different angles allows a more in-depth study of its essence and purpose.

Financial resources of enterprises include [12]: statutory fund; additionally invested capital; capital reserve; centralized capital investments funds; undivided profit; depreciation; insurance of operating costs and payments; bank loans; deferred tax liabilities; payables of all kinds. They are accumulated from internal and external sources and are combined into 3 groups: own, attracted and borrowed (pic. 2).

Enterprises financial resources optimal structure and efficient use determines their financial stability, solvency, liquidity and profitability. Companies accumulate their financial resources in fund and non-fund forms. Right after its establishment any business starts accumulating its money funds, such as: statutory and reserve fund, depreciation and payroll fund. A company can define and create more funds, if required. For example: production development fund, the fund of dividend payments, currency fund and many others. These funds can operate both on permanent and temporary basis. Company's own financial resources are formed as a result of its financial and economic activities and include such internal sources of accumulation as: statutory and depreciation funds, revenue and gross profit. Profit is the main source of internal financial resources and it can ensure the growth of its market value.
Depending on the sources of their formation, enterprises' own financial resources are subdivided into two types: invested and accumulated. Invested resources include all the financial resources having been provided by the founders of the enterprise in the form of statutory and additional capital [13]. Accumulated resources include all the resources which are gathered in the course of company's financial and economic activity. External sources of financial resources accumulation are funds received from the issue of shares and other equity contributions, funds mobilized in the financial market. External sources also include money that is formed in the process of financial resources allocation in the economic system: state and local budgets (are used in non-repayable basis); targeted non-budgetary funds (are used for non-repayable basis); targeted sectoral funds; funds of association and holdings (provided on non-repayable basis); insurance reimbursement for the risks; other gratuitous financial aid [14, p. 121].

Unlike own, involved financial resources are not in the enterprises ownership, but they are constantly used in the turnover of capital as a result of the current system of payments. They are formed at the expense of accounts payables, varying from debts on wages, contributions to non-budgetary funds related to payroll, reserves for future payments and others. These reserves are created through the accumulation of financial resources that do not belong to the company and have a purpose. They stay at company's disposal until debt maturity.

Borrowed financial resources stay at company's disposal temporarily and are used to achieve its statutory objectives. These include banking, fiscal, commercial and other types of loans that the company receives. Enterprises' financial resources formation from internal and external sources presupposes the influence of different factors. Internal factors are of an unsystematic character since they are generated by the activities of a particular enterprise, e.g. they are characterized by [14, p. 123]: the level of excellence of company's financial structure; the quality of financial management; current market analysis; the quality of financial, tax and management accounting; work with intermediary organizations; high-quality selection of employees, delegation of authority in accordance with the limits of liability.

External factors are systematic. They are not associated with any particular enterprise, but with the general economic processes in the country, including inflation, state of financial markets, fluctuations in the prices of resources and others.

Enterprises use their financial resources for the acquisition of assets, inventories, intangible assets, and for covering the cost of production and sale of products, e.g. taxes, wages, insurance premiums, rent and others [11]. Financial resources in the fund form are used by companies in the process of expanded reproduction and economic stimulation, funding the implementation of scientific and technological developments and carrying out any other statutory activities. Financial resources in the non-fund form are applied to fulfill the financial obligations to the budget, off-budget funds, banks, insurance companies. In this form companies also receive grants and subsidies, sponsor contributions, bank loans [12].

An optimal view on the financial resources of enterprises can be based on the realized synthesis and study of the designated structure of financial resources at the micro level. It is suggested to rely upon L. Zakaliuzhna's approach since the researcher defines financial resources as a combination of money in fund and non-fund form, that is formed at the enterprise in the course of country's gross domestic product distribution and redistribution and used for consumption and transformation into other types of resources [15].

**Conclusions.** The research has systematized different approaches to the definition of the notion "financial resources" at different levels of Ukraine's economic system, the most comprehensive definitions of public finance resources, finance resources of enterprises and business entities of communal ownership have been provided.

It is suggested to define state financial resources as a system of money funds, which are accumulated in the course of gross domestic product formation, distribution and use, and are used in the process of economic relations between state, enterprises and people implementation in order to give state the ability to carry out its functions. Financial resources of business entities of communal ownership can be defined as a system of economic relations arising in the process of formation and use of gross domestic product in order to ensure effective implementation of the functions of business entities of communal ownership to carry out support and development of social infrastructure. The analysis of the existing approaches to the essence of the notion of enterprises' financial resources allows to define them as funds, that are at companies' disposal and are involved in their business activities. They include both money in funds and non-fund form.

The overview of financial resources as an economic category at micro and macro levels allows the author to suggest the following definition: financial resources constitute the system of economic relations between the state, enterprises and people, having formed in the course of centralized and decentralized funds formation, distribution and use, in order to give state the ability to carry out its functions, as well as for consumption and transformation into other types of resources at all the levels.

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*Fig. 2. Enterprises' financial resources sources structure*  
(Source: elaborated by the author according to [9, 14])

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**Notes:**
- [11]...
- [12]...
- [13]...
- [14]...
- [15]...

Трофименко М. Ю., Романчук 3.3. Теоретична концептуалізація поняття "фінансові ресурси"

Розкрито економічний зміст фінансових ресурсів, що перебувають у загальнодержавному та місцевому підпорядкуванні, структуровано можливі джерела їх формування, досліджено сутність фінансових ресурсів підприємств комунальної форми власності, особливості їх накопичення та потенціал використання. Розглянуто підходи до розуміння значення фінансових ресурсів підприємств, згруповано можливі джерела їх акумулювання, систематичні та несистематичні чинники їх формування. Виведено комплексне визначення поняття фінансових ресурсів як економічної категорії на основі систематизації підходів до його глибочкування на мікро- і макроврахунках.

Ключові слова: фінансові ресурси, грошові фонди, бюджет, економічні відносини, підприємства комунальної форми власності.

Трофименко М. Ю., Романчук 3.3. Теоретична концептуалізація поняття "фінансові ресурси"