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ENFORCED COMPLIANCE IN A FRAGILE INSTITUTIONAL FIELD: A QUALITATIVE ANALYSIS OF CORPORATE TAX COMPLIANCE IN ROMANIA

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Abstract

This study examines the sociological mechanisms underlying corporate tax compliance in Romania. Drawing on semi-structured interviews with managers across diverse economic sectors and survey data measuring perceptions of fiscal legitimacy, we show that tax compliance in Romania operates within a fragile institutional field characterized by low procedural and distributive legitimacy. Our findings identify five key themes: compliance as instrumental survival strategy, structural distrust coexisting with high formal compliance, legislative instability as a driver of adaptive behaviors, sectoral normalization of gray-zone practices, and the ambivalent effects of fiscal digitalization. The results suggest that compliance is predominantly sustained through coercion, digital surveillance, and resource dependency rather than through internalized norms or institutional trust. These findings have significant implications for understanding tax behavior in post-socialist transition economies and for designing more effective tax policy interventions that address the normative foundations of compliance.

Keywords

tax compliance, fiscal sociology, institutional legitimacy, qualitative research, Romania, fiscal digitalization

Introduction

Tax evasion constitutes one of the most complex and persistent challenges facing contemporary fiscal systems, with profound implications for public revenues, social equity, and the democratic functioning of the state. The traditional approach to tax evasion, dominated by economic and legal perspectives, has focused predominantly on the technical aspects of the phenomenon, on cost-benefit analysis of evasion decisions, and on the effectiveness of control and sanctioning measures. However, the persistence and scale of the phenomenon suggest that simple economic or legal explanations are insufficient to capture the complexity of taxpayer fiscal behavior.

This research investigates the sociological mechanisms of corporate tax compliance using Romania as a case study. Romania's selection is not coincidental but justified by its distinctive characteristics: a post-socialist transition marked by profound institutional transformations, a high level of informal economy, persistent challenges regarding tax compliance, and low trust in state institutions. This informality extends to emerging economic forms such as the e-lance economy, where the global nature of freelance markets, the mobility of digital nomads, and the difficulty of regulating these activities through national legislation create additional challenges for fiscal compliance (Panzaru, 2019). According to European Commission data, Romania consistently records the highest VAT gap in the European Union,

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estimated at approximately 30% in 2023, indicating substantial systemic challenges in tax collection and compliance.

This research starts from the idea that fiscal behavior is shaped by more than rational cost-benefit calculations. It also reflects the influence of social norms, trust in institutions, perceptions of fiscal legitimacy, and the dynamics of social networks. Therefore, the study integrates contributions from fiscal sociology (Goldscheid, 1917; Schumpeter, 1918; Backhaus, 2005; Martin et al., 2009), organizational sociology (DiMaggio & Powell, 1983; Pfeffer & Salancik, 1978), and legitimacy theory (Tyler, 1990, 2006) to develop an integrated understanding of corporate tax behavior.

This article focuses on the qualitative dimensions of tax compliance, drawing on semi-structured interviews with company managers and survey data examining fiscal legitimacy perceptions. The central argument is that tax compliance in Romania functions within what we term an "enforced compliance regime in a fragile institutional field", a configuration where compliance is sustained primarily through fear, resource dependency, external pressures, and surveillance infrastructures rather than through normative legitimacy.

Theoretical Framework

Fiscal sociology, first developed by Rudolf Goldscheid (1917) and Joseph Schumpeter (1918), explores the relationship between taxation, state power, and social cohesion. Rather than viewing tax compliance only as the result of rational cost–benefit calculations, this perspective highlights the importance of social norms, institutional legitimacy, and shared obligations in shaping fiscal behavior. In this respect, fiscal sociology is closely connected to the tradition of economic sociology (Granovetter, 1985), which understands organizational behavior as embedded in a wider social context influenced not only by economic constraints, but also by cultural, social, and psychological factors. From this perspective, tax evasion is not a simply individual act of deviance, but a response shaped by institutional uncertainty, competitive pressures, and the uneven application of formal rules. This view shifts the focus away from individual pathology and towards the structural conditions that produce, enable, or tolerate different forms of fiscal (non)compliance.

Legitimacy plays a central role in explaining voluntary tax compliance. According to Tyler's procedural justice theory (1990, 2006), people are more likely to follow rules when they see the procedures through which those rules are made and enforced as fair, consistent, and impartial. In the tax context, procedural legitimacy refers to taxpayers' perceptions that tax laws are applied in a uniform and coherent way across regions, sectors, and categories of firms. Distributive legitimacy, by contrast, relates to the perceived fairness of outcomes. It concerns whether the tax burden is shared equitably and whether public revenues are used responsibly for the common good. Together, these two dimensions form what Feld and Frey (2007) describe as a "psychological tax contract", an implicit understanding between citizens and the state in which voluntary compliance depends on a sense of reciprocity between taxes paid and public goods received.

The "slippery slope" framework developed by Kirchler, Hoelzl, and Wahl (2008) brings these legitimacy-based explanations together with deterrence mechanisms. It suggests that tax compliance can emerge through two main paths: voluntary compliance, grounded in trust in public authorities, and enforced compliance, driven by state power, monitoring, and sanctions. This research explores how these mechanisms operate in the Romanian context.

The Role of Trust and Legitimacy in Taxation

Within fiscal sociology, two interconnected factors have emerged as central to understanding tax compliance: public trust in government and the perceived legitimacy of the

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tax system. Research consistently demonstrates that citizens are more inclined to fulfill their tax obligations when they believe the state possesses rightful authority to tax and when they have confidence that public institutions will manage revenues responsibly (Levi, 1988; Brautigam, 2008). Trust, in this context, encompasses several dimensions. It involves the expectation that tax revenues will be directed toward collective benefit rather than lost to corruption or mismanagement. It also includes confidence that fellow citizens are contributing appropriately to the common fiscal burden. Legitimacy, meanwhile, refers to the broader perception that taxation is justified, that fiscal rules are fair and that the state holds a valid moral and political claim to demand compliance. When these conditions are satisfied, paying taxes transcends mere legal obligation and becomes an expression of membership in a political community. The converse relationship is equally significant. When confidence in government erodes, the normative foundations supporting tax compliance weaken correspondingly. Citizens who perceive public resources as misallocated or captured by privileged interests may begin questioning the rationale for their own contributions. Under such circumstances, tax evasion can acquire a degree of moral legitimacy in popular perception, even while remaining legally prohibited. From a sociological perspective, this reflects a fundamental deterioration in the citizen-state relationship.

Levi's concept of "quasi-voluntary compliance" provides a useful theoretical framework for understanding this dynamic (Levi, 1988). She argues that tax compliance depends not solely on enforcement capacity but also on a conditional form of consent. Citizens comply partly due to legal compulsion but also because they perceive the government as fulfilling reciprocal obligations delivering public services, maintaining procedural fairness, and ensuring broad-based contribution. Compliance is thus sustained through an interplay of coercion and trust. Where legitimacy is robust, voluntary cooperation predominates; where it is fragile, states must rely more heavily on monitoring and punishment, typically incurring higher administrative and political costs. Even then, enforcement alone may prove insufficient if citizens no longer regard the fiscal system as legitimate.

Brautigam's research extends this analysis by demonstrating that taxation can actively strengthen state-society relations (Brautigam, 2008). When citizens observe tangible returns from taxation and possess mechanisms to influence fiscal decisions, through political representation or participatory budgeting their confidence in government tends to increase. This generates a positive feedback loop: effective revenue utilization builds trust, enhanced trust improves compliance, and increased compliance expands state capacity to deliver services. Conversely, where legitimacy remains weak, a negative cycle often emerges. Poor service delivery and corruption diminish trust, reduced trust encourages non-compliance, and declining revenues further constrain institutional capacity.

These dynamics highlight why fiscal sociologists insist that taxation cannot be understood through economic cost-benefit calculations alone. The historical principle of "no taxation without representation" articulates a fundamental connection between fiscal obligation, political voice, and legitimate authority that remains relevant to contemporary analysis. Variations in tax compliance across jurisdictions and over time reflect not merely differences in enforcement regimes but also underlying variations in institutional trust and the perceived legitimacy of fiscal arrangements.

Methodology

This research employs a mixed-methods design, focuses primarily on the qualitative findings. The qualitative component consisted of semi-structured interviews with managers from companies across diverse sectors (logistics, manufacturing, retail, IT, construction,

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transport), representing both large companies integrated into international supply chains and SMEs with domestic capital. Thematic analysis (Braun & Clarke, 2006) was used for interpreting the interview material, beginning with an initial distribution of themes and subsequently refined as the raw material was examined. The identified themes should not be understood as isolated attitudes or simple individual preferences but as expressions of structural sociological mechanisms produced at the intersection of economic pressures, sectoral norms, institutional architectures, and repeated experiences of interaction with the state.

The quantitative component drew on survey data (N=162) from company representatives across various Romanian industries and regions. The survey measured perceptions of fiscal legitimacy across procedural and distributive dimensions, as well as compliance motivations and behaviors. A mini-index of institutional legitimacy (0-6) was constructed by aggregating three indicators: procedural legitimacy (consistency of tax law application), distributive legitimacy (trust in use of fiscal revenues), and perceived equity of the tax system.

Results

The findings reveal a broad pattern of fragile fiscal legitimacy, low institutional trust, and differentiated compliance mechanisms across organizational contexts. The evidence suggests that tax compliance is shaped not only by formal rules and sanctions, but also by perceptions of procedural consistency, distributive fairness, legislative stability, sectoral norms, and the expanding role of digital monitoring.

At the level of procedural legitimacy, operationalized as perceptions of consistent tax law application, the results indicate a deeply problematic institutional structure. The distribution of responses showed that 37.1% of respondents perceived tax law application as inconsistent, compared to only 33.9% who perceived it as consistent. The substantial neutral zone (29.0%) points to a climate of institutional uncertainty and normative ambiguity, in which respondents neither affirmed coherence nor incoherence, possibly because of mixed experiences or the absence of clear and stable benchmarks regarding rule application. Procedural legitimacy was also significantly associated with declared tax compliance. The correlation between perceptions of inconsistency in tax law application and declared compliance was $r=-0.34$ ($p<0.01$, 95%CI [-0.48, -0.148]). This moderate but meaningful association supports the hypothesis that procedures perceived as uncertain and unequal are linked to reduced fiscal cooperation and a lower probability of voluntary compliance. This relationship appears to operate through several interdependent social mechanisms. First, perceived inconsistency is associated with the loss of institutional predictability. When taxpayers cannot anticipate how authorities will treat them, their ability to plan and to evaluate compliance rationally is diminished. In such conditions, recourse to “gray zones” tends to be interpreted as a defensive strategy aimed at reducing vulnerability in an unpredictable environment. Second, perceptions of inconsistency correlate with the erosion of the principle of equality before the law, since incoherence is often socially translated into differential treatment between small and large firms, between regions, or between industries.

The distributive dimension of legitimacy displayed even more pronounced deficits. A cumulative 58.0% of respondents reported no confidence or low confidence in the efficient use of tax revenues, while only 30.6% expressed some form of confidence, whether moderate or complete. This configuration suggests that, for a significant part of the business environment, tax payment is perceived within an incomplete or deteriorated social exchange: the fiscal contribution is experienced as a unilateral requirement without clear guarantees that it will be transformed into relevant public goods. This trust deficit was accompanied by a

DOI: 10.2478/eras-2026-0001

strongly negative perception of tax system equity. A total of 56.8% of respondents described the system as inequitable or very inequitable, whereas only 17.3% considered it equitable or very equitable. This asymmetry supports the idea of a consistent erosion of distributive legitimacy, in which the system is perceived either as distributing the tax burden disproportionately or as treating different categories of taxpayers unequally. The two dimensions of distributive legitimacy also showed substantial convergence. Respondents who expressed greater trust in the use of tax revenues also tended to describe the system as more equitable ($\rho=0.63$, $p<0.001$). More importantly, distributive legitimacy was associated with how respondents framed the economic environment in normative terms. As trust and perceived equity increased, the probability of evaluating tax evasion as a frequent phenomenon decreased: trust was associated with a lower perceived frequency of evasion ($\rho=-0.34$, $p=0.008$), and perceived equity showed a similar association ($\rho=-0.29$, $p=0.024$).

These patterns were reinforced by the mini-index of institutional legitimacy, which revealed marked polarization. Overall, 62.9% of respondents fell into the low-legitimacy category (0-2), 25.8% into the medium-legitimacy category (3-4), and only 11.3% into the high-legitimacy category (5-6). This distribution is consistent with an institutional climate perceived as fragile and contested, a context in which compliance is more difficult to stabilize normatively. The index also systematically differentiated evaluations related to environmental norms and compliance motivations. As legitimacy scores increased, the perceived frequency of evasion decreased (Spearman $\rho=-0.33$, $p=0.010$). The contrast between groups was substantial: "frequent" evasion was reported by 46.2% of respondents in the low-legitimacy group, compared to 21.7% in the medium/high-legitimacy group. Sociologically, this finding is important because perceived frequency of evasion functions as an indicator of the perceived social norm, "others do the same" with the potential to normalize non-compliance. At the same time, the legitimacy index was significantly associated with fear-motivated compliance (Spearman $\rho=0.39$, $p=0.002$). Descriptively, agreement with the statement that "compliance is mainly due to fear of penalties/audits" was lower among respondents with low legitimacy scores (25.6%) and higher in the medium/high-legitimacy group (56.5%). The appropriate interpretation is not that legitimacy produces fear, but rather that legitimacy does not automatically replace constraint. In contexts perceived as more coherent and equitable, this response may instead reflect the credibility of enforcement and recognition of deterrence as part of the compliance environment.

The qualitative evidence adds depth to these statistical patterns by showing how compliance is understood and negotiated in everyday organizational practice. A first major theme was that, for most interviewed actors, tax compliance is conceived primarily as an instrumental strategy rather than as an internalized moral obligation or a norm of civic correctness. Tax payment appears as an "entry fee" required to access essential resources, including bank financing, contracts with large firms, public tenders, and integration into international value chains. In this framework, compliance is externally imposed through coercive standards established by banks, auditors, multinationals, and institutional partners, resulting in a form of extrinsic compliance dependent on outside constraints and incentives.

"Compliance isn't about morality. It's an entry fee so you can operate with banks, large retailers, with multinationals" (Manager, logistics). This instrumental relation to taxation can be interpreted through resource dependency theory (Pfeffer & Salancik, 1978), according to which organizations adopt practices not necessarily because they see them as normatively legitimate, but because those practices mediate access to resources controlled by powerful actors in the economic environment. Tax compliance thus becomes a route to legitimation before dominant economic partners and a proof of organizational respectability necessary for maintaining exchange relationships. This logic was particularly visible in large

DOI: 10.2478/eras-2026-0001

firms and in companies integrated into international supply chains, where compliance took the form of what DiMaggio and Powell (1983) describe as coercive isomorphism. In these cases, organizations adopt strict tax standards not because they see them as intrinsically legitimate, but because they are imposed by actors in the wider institutional environment. This pattern confirms a type of enforced compliance, in the sense of the slippery slope model, in which the power of authorities and dominant economic actors substitute for trust as a mechanism for producing compliant behavior.

A second major theme was the coexistence of deep distrust in the state and in the use of tax revenues with relatively high levels of compliance among large and medium-sized firms. This configuration runs counter to simple models, and to the common assumption of a linear relationship between trust and compliance.

"We pay enormous sums and see nothing back. Infrastructure is on the ground; rules change constantly" (CEO, retail). These aspects illustrate what Feld and Frey (2007) describe as a fragile psychological tax contract. Taxpayers follow the rules not because they perceive them as fair or because they trust the efficient use of public resources, but because they seek to avoid immediate systemic risks. Compliance therefore becomes a form of defensive adaptation and a strategy for minimizing organizational vulnerability, rather than behavior grounded in procedural or distributive legitimacy.

"You don't trust, but you can't afford not to be compliant. The cost is too big" (Manager, IT). This statement suggests that distrust does not automatically lead to open evasion, as classical economic models might predict, but rather to a systematic search for "gray zones" through which actors seek to symbolically compensate for the perceived imbalance between obligations and benefits. These gray zones include aggressive tax optimization, favorable interpretations of legislative ambiguities, intensive use of tax facilities, and corporate reorganizations designed to reduce the tax burden. From the perspective of equity theory (Adams, 1965), this perception of imbalance can provide a normative basis for justifying practices at the edge of legality. Wenzel (2002, 2004) shows that perceptions of distributive inequity seen as the sense that the ratio between contributions and benefits is unbalanced, can erode tax morality even when immediate opportunities for evasion are absent. In the Romanian context, this perception is intensified by the low visibility of benefits, inconsistency in rule application, and the absence of authentic fiscal dialogue.

Legislative and fiscal instability emerged as a further recurrent theme in managerial discourse and was described almost universally as a major organizational risk factor, in some cases even more problematic than the actual level of taxation. Frequent changes in tax thresholds, taxes, special regimes, and administrative procedures were perceived as arbitrary, difficult to anticipate, and insufficiently discussed with the business environment.

"The problem isn't the tax level, but that it changes from one day to the next. You can't make budgets, you can't plan" (CFO, retail). This chronic instability produces what respondents described as continuous recalibration behavior, in which aggressive tax optimization or the exploitation of legislative ambiguities appear as rational adaptive responses to uncertainty rather than deliberate fraudulent intent: *"When the rules keep changing, you look for solutions. Not to cheat, but to survive"* (Manager, construction).

From an organizational theory perspective, legislative uncertainty reduces the capacity for strategic planning and pushes firms toward short-term strategies focused on immediate adaptation instead of long-term development. Such conditions favor what Vaughan (1998) terms the normalization of deviance, whereby practices initially regarded as exceptional gradually become standard procedures as organizations adapt to an environment experienced as unpredictable. Sociologically, this process can also be read through the concepts of moral offsetting and symbolic justification (Gneezy et al., 2012; Mullen & Monin, 2016). Actors

DOI: 10.2478/eras-2026-0001

neutralize the moral significance of questionable practices by referring to an institutional framework they perceive as unstable and unfair. Within this logic, tax optimization is no longer seen as a moral deviation, but as a legitimate adjustment to a system that itself violates expectations of predictability and procedural correctness.

The qualitative findings also revealed clear sectoral differences in how firms relate to tax evasion and optimization. In retail, in financial-banking companies, and in firms integrated into international supply chains, a "zero tolerance" norm toward tax non-compliance predominates, supported by strong internal and external audit mechanisms. By contrast, in sectors such as construction, road transport, traditional commerce, and HoReCa, the normalization of informal practices or aggressive tax optimization is more visible and is not perceived as deviance, but as an "informal rule of the game".

"In construction, if you don't accept the gray zone, you exit the market. Everyone knows this" (Manager, construction). This statement illustrates the deeply institutionalized character of partial non-compliance in certain sectors, where informal practices no longer operate as tolerated exceptions, but as collective coordination mechanisms. In these contexts, compliance or non-compliance is not the outcome of isolated individual decisions, but of competitive pressures and internalized sectoral norms that define the threshold of economic viability for market actors.

"The competition does the same. If you don't do it, you lose contracts" (Manager, logistics). This view captures the relational logic of informal compliance, in which fiscal decisions are evaluated not only in legal or ethical terms, but also through the lens of competitive viability. Partial non-compliance therefore becomes a defensive response to the anticipated behavior of other market actors rather than an isolated opportunistic choice. This corresponds to the phenomenon described in the economic literature as a race to the bottom in fiscal matters. From the perspective of organizational sociology, this process can be understood as the institutionalization of deviant practices (Ashforth & Anand, 2003), through which behaviors initially perceived as exceptional or problematic become integrated into everyday organizational functioning. Such practices are socialized through informal learning processes, normalized through discursive mechanisms that redefine them semantically, as "optimization," "flexibility," or "adaptation to reality" and eventually routinized as standard procedures and recurring organizational arrangements.

Finally, the introduction of digital fiscal monitoring systems such as SAF-T, e-Invoice, and e-Transport was perceived in a strongly ambivalent way. Respondents associated these instruments both with increased fiscal discipline and with intensified institutional pressure on economic actors. On the one hand, managers explicitly recognized that these systems have significantly reduced opportunities for classical tax evasion, especially among large and medium-sized firms characterized by standardized processes and a high degree of organizational formalization.

"With SAF-T and e-Invoice, you don't really have anywhere to hide anything" (CFO, manufacturing). This observation confirms the effectiveness of digital surveillance as a fiscal disciplining mechanism, with technology functioning as an instrument of systematic visibility over economic transactions. Through the standardization of reporting and the interconnection of databases, these systems considerably reduce taxpayer discretion and limit the scope for selective interpretations or deliberate omissions. On the other hand, respondents consistently associated digitalization with a substantial increase in compliance costs, both direct and indirect. At the direct level, firms are required to invest in dedicated software, adequate hardware infrastructure, and complex integrations between accounting, logistics, and fiscal reporting systems.

DOI: 10.2478/eras-2026-0001

"We're not afraid of evasion, we're afraid of technical errors that are penalized as fraud" (Manager, logistics). This fear points to a shift in the nature of fiscal anxiety, from the deliberate risk of breaking the law to a permanent uncertainty associated with technically perfect compliance. From the perspective of procedural legitimacy theory (Tyler, 1990, 2006), this signals an erosion of perceived procedural justice: the tax system is experienced as placing disproportionate emphasis on control, detection, and sanction, without providing proportional institutional support for managing the technical complexity introduced by the state itself. When good-faith errors are treated with the same severity as fraudulent intent, the boundary between compliance and non-compliance becomes blurred, and the procedural legitimacy of the system is undermined. Under these conditions, tax compliance risks being redefined not as a cooperative relationship between the state and taxpayers, but as a defensive exercise in sanction avoidance, with potentially negative consequences for the long-term internalization of fiscal norms.

Discussion

The findings from both quantitative and qualitative analyses converge toward an integrative theme that defines the current tax compliance regime in Romania as one of enforced compliance in a fragile institutional field. Compliance is sustained predominantly through fear, resource dependency, external pressures, and surveillance infrastructures rather than through normative legitimacy. This regime presents significant structural vulnerabilities: excessive dependence on enforcement, proliferation of sophisticated avoidance, erosion of tax morality, and high compliance costs. These findings align with and extend the "slippery slope" framework (Kirchler et al., 2008), suggesting that Romania currently operates primarily in the "enforced compliance" quadrant—high power but low trust. The qualitative data reveal the mechanisms through which this configuration reproduces itself: coercive isomorphism in supply chains, defensive adaptation to institutional uncertainty, and sectoral normalization of gray-zone practices.

The paradox of high compliance coexisting with deep institutional distrust can be understood through Goffman's (1959) concept of institutional performance. For many organizations, tax compliance functions as a public performance aimed at satisfying expectations of powerful external actors but does not reflect internal acceptance of the fiscal system's legitimacy. This form of compliance is intrinsically fragile, susceptible to erosion when external pressure decreases or when low-risk avoidance opportunities arise.

The sectoral differentiation observed in our data has important implications for policy design. Universal interventions built on the premise of taxpayer behavioral homogeneity risk producing differentiated and often counterproductive effects. A more effective fiscal policy requires recognition and incorporation of contextual specificity, combining classical instruments for increasing evasion costs with measures for reducing compliance barriers and potentially mobilizing industry actors within self-regulation and co-regulation mechanisms.

The findings regarding fiscal digitalization reveal a dual dynamic. While digital surveillance effectively reduces classical evasion and increases transaction visibility, it simultaneously generates organizational alienation and shifts fiscal anxiety from intentional evasion to technical compliance errors. This suggests the need for a balance between control and support, between sanction and proportionality, a calibration that the current system appears not to have achieved.

Conclusion

This study has examined the sociological mechanisms underlying corporate tax compliance in Romania, revealing a complex configuration where high formal compliance

DOI: 10.2478/eras-2026-0001

coexists with low institutional legitimacy and deep structural distrust. The qualitative analysis identified five key mechanisms: instrumental compliance driven by resource access requirements, structural distrust generating adaptive rather than evasive behaviors, legislative instability normalizing gray-zone practices, sectoral norms institutionalizing differentiated compliance standards, and fiscal digitalization producing both discipline and alienation.

The central contribution of this research is the concept of “enforced compliance in a fragile institutional field”, a compliance regime sustained primarily by coercion, digital surveillance, resource dependency, and pressure from dominant economic actors rather than by voluntary compliance mechanisms such as trust, norm internalization, or legitimacy recognition. This regime, while effective in maintaining formal compliance rates, presents significant vulnerabilities: dependence on continuous enforcement intensity, proliferation of sophisticated avoidance strategies, gradual erosion of tax morale, and high systemic compliance costs.

The implications for policy are substantial. The sustainability of tax compliance in the long term depends not only on intensifying control but on reconstructing procedural and distributive legitimacy, reducing institutional barriers, and developing differentiated approaches sensitive to sectoral and organizational context. Future research should explore longitudinal dynamics of legitimacy reconstruction and comparative analysis across post-socialist transition economies.

The findings suggest that effective tax policy in contexts of institutional fragility must move beyond purely deterrence-based approaches toward strategies that address the normative foundations of compliance-building trust through consistent rule application, demonstrating efficient use of public resources, and developing proportionate responses that distinguish between intentional evasion and technical compliance failures.

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