# **Essays on Public Finance**

## Research Plan - PhD in Economics

Darío Serrano-Puente

Universitat de Barcelona School of Economics Institut d'Economia de Barcelona (IEB)

Advisor: Prof. Dirk Foremny
Tutor: Prof. Elisabet Viladecans-Marsal

**i** June 16<sup>th</sup>, 2022

i Faculty of Economics and Business, Universitat de Barcelona (UB)

Barcelona, Spain

## **Outline**



- Introduction
- Dual Income Taxation and Corporations: Income Shifting
- Motivation
- Background & Contribution
- Identification, Methodology & Data
- 2 Labor and Social Inclusion of Minimum Income Protection
  - Motivation
- Objective & Expected Contribution
- Methodology & Data
- 3 PIT Benefits: Rental Housing and Private Pension Plans
  - Motivation
- Objective & Expected Contribution
- Methodology & Data
- Work Plan
- 6 Appendix

#### **O** Introduction



- Trade-off Equity vs. Efficiency.
- Income inequality social-political discontent, political instability and populism, missing out on natural talent etc.<sup>1</sup>
- Progressive redistribution (a) taxation and public spending.
- Economic efficiency and economic growth might suffer from increasing tax progressivity.
- What should our societies do?
- Empirical question what are the behavioral responses of taxpayers to tax changes? How do vulnerable people respond to public spending policies?
- Results of this PhD thesis Precommendations for policy reforms to mitigate inequalities while distorting the less the efficiency of the economy.

<sup>&</sup>lt;sup>1</sup>See Alesina and Perotti (1996), Stiglitz (2012), and Pástor and Veronesi (2021).



#### Motivation

- Effectiveness of taxation in reducing inequalities (i) degree of progressivity in the tax code and (ii) how taxpayers react to tax incentives.
- Dual PIT (Personal Income Tax) and lowered CIT (Corporate Income Tax) rates eroded progressivity.
- Incentives for entrepreneurs to become incorporated and declare capital income instead income shifting (i) between PIT bases and (ii) between PIT and CIT.
- Evidence on it using data from Spain. Why Spain?
  - Spanish public finance system follows the outlined global trends.
  - Tax decentralization (many different regional tax schemes changing over years)
     interesting sources of quasi-experimental time and cross-regional variation.
  - Rich administrative tax micro-dataset.



## **Background & Contribution**

- Entrepreneurs facing a PIT rate increase might behave differently.
  - Output reduction as after tax bill fewer net business revenues will remain ("real" response) moving downwards in income distribution paying lower average tax rate drop in economic efficiency.
  - Transferring personal income into a firm (income shifting) generating same output sheltering income from taxation real income remains constant only tax payments reduced.
- Income shifting mechanism entrepreneur files PIT as self-employed transfer business income into a corporation CIT taxes are levied on company profits transfer corporate net-income into personal income as dividends (financial capital income) and convenient salaries (labor income).
- Given dual PIT dividends enter PIT in the savings taxable income base (lower and less progressive PIT tax schedule than that on labor income) combined CIT and PIT burden can be lower than declaring all income as self-employment labor income.



## **Background & Contribution**

- Literature on elasticity of taxable income (ETI), which is not only capturing "real" economic behavior<sup>e</sup> → Update Almunia and Lopez-Rodriguez (2019) and depict the ETI part driven by income shifting in Spain.
- Pioneering paper orucial results for debate on optimal marginal tax rates Estimated effects of income shifting on relocation, welfare, economic activity, redistribution, tax revenue, inequality and loss of tax progressivity.

<sup>&</sup>lt;sup>a</sup> See Gordon and MacKie-Mason (1994), Gordon and Slemrod (1998), and Thoresen and Alstadsæter (2010). In Spain, Domínguez Barrero and Laborda (1999), Domínguez Barrero et al. (2003), Domínguez Barrero and Laborda (1999), Laborda et al. (2014), and López-Laborda et al. (2018).

<sup>&</sup>lt;sup>b</sup> See Alstadsæter and Jacob (2016), and Harju and Matikka (2016).

<sup>&</sup>lt;sup>C</sup>See Stephens and Ward-Batts (2004).

<sup>&</sup>lt;sup>d</sup> See Alstadsæter and Jacob (2016), Chetty and Saez (2005), Kari et al. (2008), le Maire and Schjerning (2013), Auerbach et al. (1998), Jacob (2016), and Jacob (2018).

<sup>&</sup>lt;sup>e</sup> See Pirttilä and Selin (2011), Slemrod (2001), Gruber and Saez (2002), Chetty (2009), Saez et al. (2012), Harju and Matikka (2016), and Bergolo et al. (2022).



#### Identification, Methodology & Data

- Identify causal effect of tax changes on income shifting.
  - Variation tax policy changes across regions and over time on PIT and CIT (and other capital taxes).
  - Data Administrative tax panel micro-data for the period 1998-2019.
  - Techniques new difference-in-difference and event study methods.
- Treatment individual specific threshold at which each entrepreneur would be indifferent between either way of taxation.
- Identification of potential shifters firm owners.
  - Those for whom  $\frac{ssc}{ylab} > 6.4\%$ , where ssc are social security contributions and ylab is gross labor income.
  - Company owners can deduct not only employee social security contributions but also employer social security contributions. 6,4% is the normal percentage applied to gross salary to compute the employee social security contributions.



#### Identification, Methodology & Data

- This **novel identification** overcomes limitations of earlier approaches.
- Estimates on how much of the response of the taxpayers to tax changes (ETI) could be attributed to (1) "real" economic-activity responses and to (2) income shifting.
- Counterfactual analysis simulating an economy where actual shifters did not shift.
   What would be the tax revenue loss?
- Quantifying tax progressivity loss and effects on income (and wealth) inequality.

## **Preliminary Evidence**

#### [Undisclosed data. No consent to display results.]

- As many as 3% of taxpayers react to those incentives.
- # of identified potential shifters rise and occupy a larger proportion of the total taxpayers during years with higher marginal PIT rates (2012-2014).



#### Motivation

- Income supplementation alleviate poverty and inequality in many countries.
- Difficult balance between the emergence of new social needs and limits to increasing budgetary resources.
  - Evaluation of minimum income is a crucial need how do people receiving it behave in short- / long-term?
- Spain nultiple and co-existing means-tested and non-means-tested minimum income programs.
  - As of 2007 regional governments started to introduce own and differing minimum income schemes "Rentas Mínimas Autonómicas".
  - With COVID-19, central government introduced national minimum income program "Ingreso Mínimo Vital".
- Unique source of rich variation quantitatively evaluate effects of the Spanish minimum income programs on poverty, inequality, labor inclusion, and education gap, among others.



## **Objective & Expected Contribution**

- Descriptive work implementation & sufficiency of minimum income programs to alleviate poverty and inequality, fitting and overlapping within the complex system of government benefits, and non-take-up analysis.<sup>a</sup>
- Quantitative empirical evaluation (a) address questions that have not been analyzed in the literature (or have been studied in a very limited way).
  - Incentives for those receiving it to get better socio-economic conditions.
  - Insurance against transitory income shocks.
  - Potential undesirable effects arising.
- Many policy recommendations could be drawn from it.

<sup>&</sup>lt;sup>a</sup> My work will contribute to descriptive literature on minimum income: Nelson (2008), Nelson (2010), Marx and Nelson (2013), Wang and van Vilet (2016), Natili (2017), Crepaldi et al. (2017), and Coady et al. (2021). In Spain, Noguera (2019), Natili (2019), Aguilar-Hendrickson and de Durana (2020), and Berjón and Gorjón (2021), among others. It will be also linked with works on non-take-up like Goedemé and Janssens (2020), Rejinders (2020), Lucas et al. (2021), and Sylvia et al. (2022).

<sup>&</sup>lt;sup>b</sup> The paper will be contributing to the non-developed literature on quantitative evaluations of the minimum income schemes, e.g. Saboia and Rocha (2002). It will be entering on top of the specific empirical literature focused on Spain covered so far by Hernández et al. (2020), Gambau-Suelves and Nuria (2020) and Ayala et al. (2021).



## Methodology & Data

- Identify causal effect of minimum income policy changes on several outcomes (poverty, income and social inequality, labor inclusion, or education gap, among others).
  - Variation minimum income policy changes across regions and over time.
  - Data Administrative tax panel micro-data for the period 1998-2019 not only on income, but also on wealth and other socioeconomic characteristics not only for PIT fillers, but for the whole population.
  - Quasi-experimental **3** new diff-in-diff or regression discontinuity design.
- Treatment individuals receiving the minimum income quantity.
- Control those with similar characteristics not receiving it not small group since
  many Spanish minimum income programs define some very strict requirements on
  legal issues not based on income or social status.<sup>a</sup>

<sup>&</sup>lt;sup>a</sup> It is key here to note that non-compliance of legal issues (those not related with socio-economic status) is equally distributed among those potentially eligible for accessing the minimum income amount when only observable-in-data socio-economic characteristics are taken into account, which prevents individuals in the control groun from self-selection bias.



#### Motivation

- Ageing at an increasing rate sustainability of the public pension system.
- Asset inequality, concentration of housing wealth, depopulation and agglomeration of population around big cities prising price of rental housing.
- Political and economic solutions in taxation Taxable income deductions in PIT for
   (1) those who make contributions to private pension plans and for (2) owners who offer
   their housing assets in the rental market for primary residence renting purposes.
- No proper evaluation so far of these tax benefit policies in Spain.
- Decentralized tax policy context mpirical evaluation with very large and rich variation not only over time, but also across different regions.



## **Objective & Expected Contribution**

- Changes in the exemption percentage for residential rental income or the increase in income imputed to non-habitual housing ② effects on rental prices, extensive margin of private rental housing supply, or income concentration in housing landlords.
- Introduction of taxable income deduction of €10,000 or reduction to €1,500 for contributions to private pension plans effects on private savings decisions and on the form of complementary pension savings.
- Literature on tax benefit evaluations through micro-simulation techniques and causality analyses<sup>a</sup> related to rental pricing <sup>b</sup> and fiscal treatment of public pension plans<sup>c</sup>
- First study to quantitatively and empirically evaluate these two issues in Spain.
- Relevant to inequality holders/savers occupy higher parts of income distribution.

<sup>&</sup>lt;sup>a</sup> See Spadaro (2005) and Roca (2010).

<sup>&</sup>lt;sup>b</sup>See Jappelli and Pistaferri (2007), Cummings and DiPasquale (2010), Williamson (2011), and McClure (2018), among others.

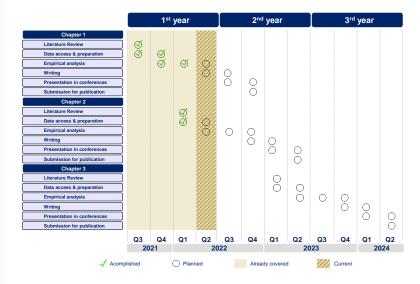
<sup>&</sup>lt;sup>C</sup>See Cymrot (1980), Whitehouse (1999), and Varga (2018), among others.



## Methodology & Data

- Identify causal effect of tax benefits on several outcomes (housing supply, rental prices, income and social inequality, savings decision on pension plans vs. other savings instruments, tax revenue, or social security balance).
  - Variation PIT benefit policy changes over time.
  - Data Administrative tax panel micro-data for the period 1998-2019 not only on income, but also on wealth and other socioeconomic characteristics match landlord-tenant/renter
  - Quasi-experimental new diff-in-diff or regression discontinuity design.
- Treatment individuals experiencing a marginal tax rate change due to tax benefit policy changes.
- Control (2) those with similar characteristics not facing it.









#### Darío Serrano-Puente

Universitat de Barcelona School of Economics Institut d'Economia de Barcelona (IEB)

- Personal website
  - dario.serrano@ub.edu @darioserranopue
- in serranopuente
- serranopuente

- Google Scholar
- ORCID
- IDEAS/RePEc
- P Publons
- SSRN SSRN

#### References I



- AGUILAR-HENDRICKSON, M. AND A. A. G. DE DURANA (2020): "Out of the wilderness? The coming back of the debate on minimum income in Spain and the Great Recession," Social Policy Administration, 54, 556–573, https://onlinelibrary.wiley.com/doi/full/10.1111/spol.12605.
- ALESINA, A. AND R. PEROTTI (1996): "Income distribution, political instability, and investment," European Economic Review, 40 (6), 1203–1228, https://doi.org/10.1016/0014-2921(95)00030-5.
- ALMUNIA, M. AND D. LOPEZ-RODRIGUEZ (2019): "The elasticity of taxable income in Spain: 1999-2014," SERIES, 10 (3-4), 281-320, https://link.springer.com/article/10.1007/s13209-019-00208-x.
- ALSTADSÆTER, A. AND M. JACOB (2016): "Dividend Taxes and Income Shifting," Scandinavian Journal of Economics, 118 (4), 693-717, https://onlinelibrary.wiley.com/doi/full/10.1111/sjoe.12148.
- AUERBACH, A., L. E. BURMAN, AND J. M. SIEGEL (1998): "Capital Gains Taxation and Tax Avoidance: New Evidence from Panel Data," National Bureau of Economic Research Working Papers, n. 6399, https://EconPapers.repec.org/RePEc:nbr:nberwo:6399.
- AYALA, L., J. M. ARRANZ, C. GARCÍA-SERRANO, AND L. MARTÍNEZ-VIRTO (2021): "The effectiveness of minimum income benefits in poverty reduction in Spain," *International Journal of Social Welfare*, 30, 152–169.
- BERGOLO, M., G. BURDIN, M. DE ROSA, M. GIACCOBASSO, M. LEITES, AND H. RUEDA (2022): "How do Top Earners Respond to Taxation? Evidence from a Tax Reform in Uruguay," SSRN Papers, https://dx.doi.org/10.2139/ssrn.4007698.
- BERJÓN, A. AND L. GORJÓN (2021): "Alleviating Poverty in Spain: Evidences from the Minimum Income Scheme," ISEAK Working Papers.
- CHETTY, R. (2009): "Sufficient Statistics for Welfare Analysis: A Bridge Between Structural and Reduced-Form Methods," Annual Review of Economics, 1, 451–488, https://doi.org/10.1146/annurev.economics.050708.142910.
- CHETTY, R. AND E. SAEZ (2005): "Dividend Taxes and Corporate Behavior: Evidence from the 2003 Dividend Tax Cut," The Quarterly Journal of Economics, 120 (3), 791-833, https://academic.oup.com/qje/article/120/3/791/1841479.
- COADY, D., S. JAHAN, B. SHANG, AND R. MATSUMOTO (2021): "Guaranteed Minimum Income Schemes in Europe: Landscape and Design," *IMF Discussion Papers*.
- CREPALDI, C., B. DA ROIT, C. CASTEGNARO, AND S. PASQUINELLI (2017): "Minimum income policies in EU Member states | Policy Commons," European Parliament Committee on Employment and Social Affairs.

#### References II



- CUMMINGS, J. L. AND D. DIPASQUALE (2010): "The Low-Income Housing Tax Credit An Analysis of the First Ten Years," Housing Policy Debate, 10, 251–307.
- CYMROT, D. J. (1980): "Private Pension Saving: The Effect of Tax Incentives on the Rate of Return," Southern Economic Journal, 47, 179.
- DOMÍNGUEZ BARRERO, F., J. L. LABORDA, AND F. R. SAUCO (2003): "Incidencia del IRPF y el Impuesto sobre Sociedades en la elección de la forma de empresa: dos aproximaciones empíricas," Universidad de Zaragoza, https://dialnet.unirioja.es/descarga/articulo/3134066.pdf.
- DOMÍNGUEZ BARRERO, F. AND J. L. A. LABORDA (1999): "Efectos de la reforma del IRPF sobre las decisiones de financiación e inversión societaria y sobre la elección de la forma de la empresa," *Universidad de Zaragoza*.
- GAMBAU-SUELVES, B. AND B.-P. NURIA (2020): "The New "Minimum Vital Income" in Spain: Distributional and Poverty Effects in the Presence and Absence of Regional Minimum Income Schemes," JRC - Institute for Social and Economic Research (ISER).
- GOEDEMÉ, T. AND J. JANSSENS (2020): "The Concept and Measurement of Non-Take-Up: An overview, with a focus on the non-take-up of social benefits," *InGRID*.
- GORDON, R. AND J. SLEMROD (1998): "Are "Real" Responses to Taxes Simply Income Shifting Between Corporate and Personal Tax Bases?" National Bureau of Economic Research Working Paper, n. 6576, https://www.nber.org/papers/w6576.
- GORDON, R. H. AND J. K. MACKIE-MASON (1994): "Tax distortions to the choice of organizational form," Journal of Public Economics, 55 (2), 279–306, https://doi.org/10.1016/0047-2727 (94) 90055-8.
- GRUBER, J. AND E. SAEZ (2002): "The Elasticity of Taxable Income: Evidence and Implications," Journal of Public Economics, 84 (1), 1–32, https://doi.org/10.1016/S0047-2727 (01) 00085-8.
- HARJU, J. AND T. MATIKKA (2016): "Business owners and income-shifting: evidence from Finland," Small Business Economics, 46, 115–136.
- HERNÁNDEZ, A., F. PICOS, AND S. RISCADO (2020): "Moving towards fairer regional minimum income schemes in Spain," JRC Working Papers.

#### References III



- INSITUTO DE ESTUDIOS FISCALES (IEF) (2022): "Panel de declarantes del Impuesto sobre la Renta de las Personas Fisicas 1999-2016," https://www.ief.es/Investigacion/Est\_paneles.vbhtml.
- JACOB, M. (2016): "Cross-base tax elasticity of capital gains," Applied Economics, 48 (28), 2611–2624, https://doi.org/10.1080/00036846.2015.1125438.
- --- (2018): "Tax Regimes and Capital Gains Realizations," European Accounting Review, 27 (1), 1–21, https://doi.org/10.1080/09638180.2016.1203811.
- JAPPELLI, T. AND L. PISTAFERRI (2007): "Do people respond to tax incentives? An analysis of the Italian reform of the deductibility of home mortgage interests," European Economic Review, 51, 247–271.
- KARI, S., H. KARIKALLIO, AND J. PIRTTILÄ (2008): "Anticipating Tax Changes: Evidence from the Finnish Corporate Income Tax Reform of 2005\*," Fiscal Studies, 29 (2), 167–196, https://doi.org/10.1111/J.1475-5890.2008.00072.X.
- LABORDA, J. L., J. VALLÉS GIMÉNEZ, AND A. Z. MARCO (2014): "IRPF dual y transformación de rentas generales en rentas del ahorro," Fedea - Estudios sobre la Economía Española, 14, https://ideas.repec.org/p/fda/fdaeee/eee2014-11.html.
- LE MAIRE, D. AND B. SCHJERNING (2013): "Tax bunching, income shifting and self-employment," Journal of Public Economics, 107, 1–18, https://doi.org/10.1016/J.JPUBECO.2013.08.002.
- LÓPEZ-LABORDA, J., J. VALLÉS-GIMÉNEZ, AND A. ZÁRATE-MARCO (2018): "Income Shifting in the Spanish Dual Income Tax," Fiscal Studies, 39 (1), 95–120, https://doi.org/10.1111/j.1475-5890.2017.12147.
- LUCAS, B., J. M. BONVIN, AND O. HÜMBELIN (2021): "The non-take-up of health and social benefits: What implications for social citizenship?" Swiss Journal of Sociology, 47, 161–180.
- MARX, I. AND K. NELSON (2013): "A New Dawn for Minimum Income Protection?" Minimum Income Protection in Flux, 1–27.
- McClure, K. (2018): "What Should Be the Future of the Low-Income Housing Tax Credit Program?" Housing Policy Debate, 29, 65–81.
- NATILI, M. (2017): "Explaining different trajectories of minimum income schemes: Groups, parties and political exchange in Italy and Spain:," Journal of European Social Policy, 28, 116–129.
- --- (2019): "Minimum Income Protection in Italy and Spain," The Politics of Minimum Income, 65-129.

## References IV



- NELSON, K. (2008): "Minimum income protection and European integration: Trends and levels of minimum benefits in comparative perspective, 1990-2005," *International Journal of Health Services*, 38, 103–124.
- --- (2010): "Social assistance and minimum income benefits in old and new EU democracies," *International Journal of Social Welfare*, 19, 367–378.
- Noguera, J. A. (2019): "The Political Debate on Basic Income and Welfare Reform in Spain," Social Policy and Society, 18, 289–299
- PIRTTILÄ, J. AND H. SELIN (2011): "Income Shifting within a Dual Income Tax System: Evidence from the Finnish Tax Reform of 1993," Scandinavian Journal of Economics, 113 (1), 120–144, https://doi.org/10.1111/J.1467-9442.2010.01635.X.
- PÁSTOR, L. AND P. VERONESI (2021): "Inequality Aversion, Populism, and the Backlash against Globalization," Journal of Finance, 76 (6), 2857–2906, https://doi.org/10.1111/jofi.13081.
- PÉREZ LÓPEZ, C., J. VILLANUEVA GARCÍA, AND I. MOLINERO MUÑOZ (2019): "Panel de declarantes de IRPF 1999-2015: metodología, estructura y variables," Documentos de Trabajo Instituto de Estudios Fiscales (IEF), https://www.ief.es/docs/destacados/publicaciones/documentos trabajo/2019 14. pdf.
- REIJNDERS, M. (2020): "Non-take-up of social support and the implications for social policies," Universiteit Leiden Scholarly Publications.
- Roca, J. (2010): "Evaluation of the Effectiveness and Efficiency of Tax Benefits," Inter-American Development Bank.
- SABOIA, J. AND S. ROCHA (2002): "An Evaluation Methodology for Minimum Income Programmes in Brazil", iSBN 92-2-113310-9.
- SAEZ, E., J. SLEMROD, AND S. H. GIERTZ (2012): "The Elasticity of Taxable Income with Respect to Marginal Tax Rates: A Critical Review," Journal of Economic Literature, 50 (1), 3-50, https://doi.org/10.1257/je1.50.1.3.
- SLEMROD, J. (2001): "A General Model of the Behavioral Response to Taxation," International Tax and Public Finance, 8, 119–128, https://doi.org/10.1023/A:1011204301325.
- SPADARO, A. (2005): "Micro-simulation and Normative Policy Evaluation: An Application to Some EU Tax Benefits Systems," Journal of Public Economic Theory, 7, 593–622.

#### References V



- STEPHENS, M. AND J. WARD-BATTS (2004): "The impact of separate taxation on the intra-household allocation of assets: evidence from the UK," Journal of Public Economics, 88 (9-10), 1989–2007, https://doi.org/10.1016/S0047-2727(03)00067-7.
- STIGLITZ, J. E. (2012): "The price of inequality", published by W. W. Norton & Company, New York.
- SYLVIA, S., X. MA, Y. SHI, AND S. ROZELLE (2022): "Ordeal mechanisms, information, and the cost-effectiveness of strategies to provide subsidized eyeglasses," *Journal of Health Economics*, 82, 102594.
- THORESEN, T. O. AND A. ALSTADSæTER (2010): "Shifts in Organizational Form under a Dual Income Tax System," FinanzArchiv / Public Finance Analysis, 66 (4), 384–418, https://www.jstor.org/stable/20839200.
- VARGA, G. (2018): "Tax Benefits of Open Individual Private Pension Plans," Latin American Business Review, 19, 55-75.
- WANG, J. AND O. VAN VLIET (2016): "Social Assistance and Minimum Income Benefits: Benefit Levels, Replacement Rates and Policies across 26 Oecd Countries, 1990–2009:," European Journal of Social Security, 18, 333–355.
- WHITEHOUSE, E. (1999): "The tax treatment of funded pensions Munich Personal," World Bank Working Papers.
- WILLIAMSON, A. R. (2011): "Can They Afford the Rent? Resident Cost Burden in Low Income Housing Tax Credit Developments:," Urban Affairs Review, 47, 775–799.



## [Undisclosed data. Only some main features are provided]<sup>2</sup>

#### Base data

- Panel de declarantes del Impuesto sobre la Renta de las Personas Fisicas 1999-2016, Insituto de Estudios Fiscales (IEF) (2022).
   From AEAT & INE.<sup>3</sup>
- Longitudinal sample of individual PIT returns (4% of total returns) 

   amount and source of income, personal characteristics (e.g., age and gender), fiscal residence, etc. 
   15 of 17 Spanish autonomous communities (+ Ceuta & Melilla).<sup>4</sup>

## New Data (Now under construction (AEAT & INE) and not yet disclosed publicly)

 Updated up to 2019 Richer income information not only PIT fillers, but whole population new rich data on wealth and other socioeconomic characteristics.



<sup>&</sup>lt;sup>2</sup> Data will be public and accessible to the whole research community once my papers will be close to public circulation. Due to ethical and legal reasons, data cannot be shared with any third person. Datasets used in this PhD research are properly stored following the corresponding security procedures. Data are anonymized by the providing institutions and no results are computed with less than 20 obs.

<sup>&</sup>lt;sup>3</sup>A detailed description of the already published and open-access dataset is provided in Pérez López et al. (2019).

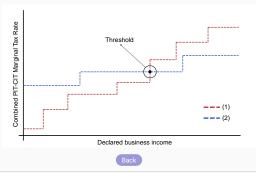
<sup>&</sup>lt;sup>4</sup>Only data for regions in the Common Fiscal Regime. Regional governments of Basque Country and Navarre do not disclose data.

## A2 Computation of individual specific threshold



At this point, an entrepreneur would be **indifferent** between:

- 1. Declaring all income as self-employed in the general PIT base.
- Transferring income into a company, paying CIT on its profits, and then attributing dividends (entering the savings PIT base) and convenient salaries (entering the general PIT base) from the company to the person.<sup>5</sup>



<sup>&</sup>lt;sup>5</sup>It is also considered that creating a company has certain expenses and requires at the same time greater documentary and formal obligations than self-employment. It also takes into account whether or not the company provides greater legal coverage, mainly for the person's private assets. The threshold provided can also considerably vary depending on the personal characteristics of each individual or company.