



Financial assistance transactions: International standards, tax rules, and accounting and taxation arrangements

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Abstract. The study aimed to substantiate the conceptual principles of accounting and taxation of financial assistance transactions, integrating the requirements of international and national standards, tax rules, and best practices for disclosure. The methodological basis consisted of an analysis of the provisions of the Tax and Civil Codes of Ukraine, regulatory documents of national legislation, a comparative review of national accounting provisions (standards) and international standards (recognition, measurement, disclosure), content analysis of public reporting, and theoretical modelling of the stages of providing repayable and non-repayable assistance. Empirical materials included reports from the National Bank of Ukraine, the World Bank, and the Organisation for Economic Co-operation and Development. The results obtained made it possible to classify financial assistance (repayable/non-repayable; intra-group/external; market/preferential) as an economic unit, establish the sequence of initial recognition and subsequent measurement with the reflection of the time value of money, outline the requirements for notes (contract terms, discount rates, sensitivity of estimates, related party transactions) and demonstrate how temporary and permanent tax differences arise and were reconciled. The results achieved were summarised in a comprehensive applied framework: the classification of financial assistance according to the "return – remuneration" matrix has been systematised, the accounting approaches of accounting provisions (standards) and international financial reporting standards have been harmonised with tax regulations, and an algorithm has been developed from initiation to disclosure, including a list of primary documents. Using the example of the Joint-Stock Company "Ukrnafta", reproducible identification of transactions, reconciliation of the relationship "profit – taxes – dividends", and typical temporary and permanent differences have been demonstrated. The practical value lies in the list of control points for internal control (contractual terms, primary documents, marketability of intra-group instruments, cash flow tracking), as well as in the applied recommendations for transparent disclosure and neutralisation of tax risks, including hybrid mismatches and transfer pricings

Keywords: international norms; concessional loans; non-repayable aid; repayment and remuneration; dividends

Introduction

The organisation of accounting and taxation of financial assistance transactions determined the ability to convert financial flows into transparent and reproducible indicators, which increased the efficiency of resource use and reduced the cost of capital. Despite significant institutional potential, the national system faces challenges of inconsistent application of standards, fragmented documentation of aid conditions, as well as risks of

intra-group financing and hybrid mismatches. Therefore, the development and implementation of coordinated approaches to embedding accounting and tax solutions into corporate practice was crucial both for reducing fiscal risks and for strengthening the competitiveness of enterprises and the stability of the financial system. In Ukraine, there was still a gap between the declared focus on transparency and accountability in

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financial assistance accounting and actual practice, which was dominated by fragmented decisions and inconsistent application of international and national standards. At the same time, performance assessment was largely focused on process indicators and initial costs, while indicators reflecting the full accounting cycle, from recognition and presentation in financial statements to the formation of tax differences, were not integrated into a single monitoring model. The uncertainty of key performance indicators and the lack of an emphasis on changes in liquidity, cost of capital, and tax base sustainability hinder the transition to a consistent policy for accounting and taxation of financial assistance and made it impossible to verify the long-term effects of such programmes on business competitiveness and fiscal sustainability. The study by L. Chyzhevska & D. Osipchuk (2020) compared international and national approaches to the recognition of government assistance. The study proved that the determining factor was the terms and conditions of the provision and implementation of assistance. The study described in detail two acceptable methods of reflection: as income for the period or as a reduction in expenses or the initial cost of an asset. At the same time, S. Frolov *et al.* (2021) proposed strategic and tactical guidelines for restructuring the financial system, emphasising the coordination of institutions, support instruments and financing channels. The study showed that the effectiveness of state and donor interventions was determined not by individual programmes, but by the transparency of beneficiary selection criteria, the predictability of conditions and reporting requirements. The study highlighted the need to introduce a system of indicators that would record not only cash flows, but also the results achieved.

K. Romenska *et al.* (2020) examined the relationship between budget planning and the development of the budget process, with an emphasis on the transparency of rules, the consistency of procedures, and the quality of performance indicators. The study asserted that the effectiveness of support programmes depended not on the number of instruments, but on the predictability of conditions, the clarity of beneficiary selection, and proper control of targeted use. In contrast, V. Rysin & R. Pechenko (2024) described structural shifts in the financial services market during wartime, noting changes in user behaviour, sources of liquidity, and lending channels. The study showed that the redistribution of risks and the changed price of resources affect financing parameters, including preferential loans and other forms of support. At the same time, I. Sadovska & K. Nahirska (2023) emphasised accounting and taxation of targeted financing in terms of grant funds, distinguishing between assistance related to asset formation and assistance aimed at reimbursing expenses. The study revealed the conditions for recognition, methods of presentation in financial statements, and typical errors that led to distortions in financial results and the tax base. Documentation of

targeted use and the need for consistent accounting policies were emphasised: from the moment of reasonable assurance to the reflection of the consequences of non-compliance with the conditions.

Scientists S. Lehenchuk & N. Vyhovska (2024) critically re-evaluated the practice of accounting for government grants under the International Accounting Standard on Aid and Disclosure of Support. The study emphasised key issues, including ambiguity in the interpretation of recognition criteria and inconsistency in presentation methods. The experts highlighted the principle of substance over form and proposed practical guidelines for developing a consistent accounting policy that ensured the reproducibility of decisions and increased the confidence of users of financial statements. At the same time, D. Zakharov (2024) analysed the significance of introducing a two-tier tax solution in the international taxation system, emphasising the minimum global tax rate and the redistribution of tax rights between jurisdictions. The author outlined the changes in the tax environment for transnational groups, particularly in terms of intra-group financing. A. Kaminskyi *et al.* (2023) developed a dynamic model for forecasting the consumer credit market, which incorporated changes in demand, the cost of resources, and the risks of default. The study demonstrated that loan terms were influenced by many factors, such as household income and interest rates, and therefore a fair assessment of such instruments required correct discounting and consideration of expected credit losses. The proposed approach can be used to distinguish temporary price fluctuations from systemic changes in risk.

Existing studies on accounting and taxation of financial assistance transactions focused predominantly on individual instruments (grants, concessional loans, intra-group contributions), while a comprehensive model combining recognition and reporting rules, tax difference formation and disclosure requirements in a single reproducible cycle of management and tax accounting remained underdeveloped. Issues related to the reconciliation of the valuation of concessional loans with expected credit losses, the neutralisation of hybrid mismatches, the limitation of interest expenses, and the beneficial owner test in cross-border payments were not fully addressed in the studies. The study aimed to substantiate the conceptual basis for organising accounting and taxation of financial assistance transactions, considering the requirements of international and national standards, tax legislation, and the need for transparent disclosure of information. To achieve this goal, a set of tasks was defined: to identify the features and approaches to accounting and taxation of financial assistance transactions, including interest expenses and exchange rate differences; to outline mechanisms for neutralising the risks of hybrid mismatches in cross-border transactions; to propose a system of indicators for assessing the effectiveness of financial assistance at the enterprise level and its impact on the tax base.

Materials and Methods

The study was empirical in nature and covered the period from 2020 to 2025, during which financial assistance operations became a key tool for supporting liquidity and redistributing resources in the corporate sector. The study used a combination of conceptual and theoretical generalisation and structural and logical analysis to formulate definitions and distinguish financial assistance from loans and dividends. The classification scheme "return – reward" was constructed using the typology method with subsequent verification using examples of typical operations (repayable forms of financial assistance, non-repayable forms of support, transactions with deferred movement of funds and changes in value over time), where categories were used to distinguish between repayable (loans, guarantees, prepayments) and non-repayable forms of assistance (grants, capital contributions), which made it possible to classify each transaction according to the appropriate type of accounting and determine its impact on the financial result and tax differences. To describe the process models, theoretical modelling was used with the fixation of control points in document flow, and the risks of intra-group transactions were assessed using the scenario comparison method of the consequences of alternative classification (debt versus equity), with subsequent verification of sensitivity to key assumptions. Empirical materials included reports from the OECD (2015), National Bank of Ukraine (2024), the World Bank (International Bank for Reconstruction..., 2015; World Bank Group, 2024).

The legal component was developed using a regulatory and legal analysis method, comparing the provisions of the Civil Code of Ukraine (2003) and Law of Ukraine No. 1946-IX (2021) with accounting standards. For national and international standards, including Order of the Ministry of Finance of Ukraine No. 318 (1999), International Accounting Standards Board (2001), International Financial Reporting Standard 9 (IFRS 9) "Financial Instruments" (2012), a comparative analysis of the requirements for recognition, measurement and disclosure was applied, including tracing the "chain" from primary documents to notes. International Accounting Standard 24 (IAS 24) "Related Party Disclosures" (2012) was also considered. Anti-hybrid rules and approaches to related party transactions were assessed using a compliance review method: a list of evidence and disclosures required to prove the economic substance of a transaction was formalised, and their consistency across reporting forms was verified. The case study analysed the practical implications for accounting and taxation of specific financial assistance transactions.

Based on content analysis, an empirical study of public cases was conducted, focusing on the Joint-Stock Company (JSC) "Ukrnafta" as a representative example of a large company with a full cycle of disclosures (audits, reports, official announcements) and key financial agreements (Dividend payments complete..., 2024;

Ukrnafta, 2025a; Ukrnafta, 2025c). The analysis included data for 2020 on the settlement of tax arrears through a related package of agreements with the National Joint Stock Company "Naftogaz of Ukraine" (Ukrnafta, 2020), as well as financial results for 2023-2024, which showed stabilisation of profitability, tax payment dynamics and dividend policy. In particular, the study analysed the classification of instruments (repayable and non-repayable aid, market and non-market remuneration), the economic content of prepayments and intra-group financial agreements. The choice of research case was based on the availability of complete and consistent sources of information (audit reports, public announcements, production indicators), formal signs of compliance with contractual terms, and the ability to trace the entire "chain" from the contract to the notes in the financial statements. Profitability, net income, tax and dividend movements for 2023-2024, and operating parameters (oil and gas production) were analysed as a basis for verifying the validity of accounting judgements regarding a significant component of financing, credit risk assessment, and the accuracy of disclosures in the notes. The statistical data was processed using the method of theoretical generalisation and structural-analytical comparison of dynamic indicators, which was used to track trends in profitability, tax revenues and the distribution of the company's financial resources.

The tax implications were examined using a comparative method, and based on the provisions of the Tax Code of Ukraine (2010), permanent and temporary differences were identified for repayable, non-repayable and preferential financial assistance (State Tax Service of Ukraine in Odesa region, 2023). Permanent differences arose in relation to non-repayable assistance, while temporary differences arose in relation to repayable and preferential assistance, where the difference in the recognition of interest and discount caused differences between accounting and tax accounting. To verify the impact of such differences, tax calculations were reconstructed based on corporate income tax return data. The risks of hybrid mismatches were assessed using the approach of neutralising the effects of "double deduction" or "deduction without inclusion" based on the requirements of Council Directive (EU) No. 2016/1164 (2016), and data from Ministry of Finance of Ukraine (2016), European Commission (2017). For intra-group transactions, an economic analysis of market conditions was conducted based on criteria such as interest rate, term, collateral and subsidisation.

Results

Economic essence and classification of financial assistance operations

The economic essence of financial assistance lies in the targeted redistribution of monetary resources outside the logic of ordinary commodity exchange: one party provides the other with funds or other financial resources

with (or without) defined repayment terms. In the system of financial relations, it was a tool that mitigates cyclical fluctuations and supports the viability of enterprises, when sources of liquidity were insufficient or access to market financing was limited (Lagovska & Loskorikh, 2023). Experience with public support programmes around the world showed that a combination of subsidies, concessional loans, guarantees and other forms of assistance can reduce market gaps and support investment activity, but only if the design was transparent and there were clear rules for reporting, supervision and disclosure (World Bank Group, 2024). Such approaches were structured in the World Bank's principles for credit guarantee schemes, which emphasised requirements for mandate, pricing, partial risk coverage, independent oversight and regular auditing (International Bank for Reconstruction and Development..., 2015). This defined the place of financial assistance in the financial ecosystem as a tool that transformed public or corporate incentives into measurable results, while minimising the risk of distortion of competition.

The difference between aid and traditional loans and dividends lies in the purpose and distribution of risk. A loan granted on market terms involved an equivalent exchange and price compensation for risk, while aid may contain a wholly or partly gratuitous component that deliberately redistributed benefits in favour of the recipient (Kollruss, 2023). Dividends were a distribution of already generated profits among owners and do not serve as a mechanism for supporting solvency in periods of instability. Grants, preferential loans and guarantees, on the other hand, act as a financial "shock absorber": it reduced the cost of capital, expanded access to loans and reduced the likelihood of a sharp decline in investment (National Bank of Ukraine, 2024). The European Commission's regulatory practice reflected this difference and explicitly lists forms of state support: grants, tax incentives, state-supported loans, guarantees, and the provision of resources on preferential terms, with an emphasis on the need to control the impact on competition and the transparency of conditions (Council Directive (EU) No. 2016/1164, 2016).

Classification approaches to financial assistance should be structured along two interrelated vectors: repayment and remuneration (International Bank for Reconstruction and Development..., 2015). In terms of repayment, a distinction was made between repayable assistance (loans on market or preferential terms, including those with a state guarantee component) and non-repayable assistance (grants, subsidies, transfers). In terms of remuneration, there was a distinction between market and non-market, depending on whether the price of the instrument compensates for the actual risk and the time value of money (Hess & Mills, 2025). This distinction was not purely theoretical: it determined the moment of recognition in reporting, the basis for assessment and the method of presenting results. For

non-repayable transfers, it was necessary to correlate the recognition of income with the expenses that were compensated or with the formation of assets if the aid was intended for investment; for loans on preferential terms, it was necessary to calculate the present value of the liability and systematically reflect the interest effect over time. When aid was provided in the form of a refund on terms that deviated from market conditions, the difference between the nominal amount and the present value of the obligations forms a separate economic effect, which must be transparently explained in the notes. For programmes where part of the risk was assumed by the state through a guarantee, international approaches explicitly required documentation of the scope of coverage, the price of the guarantee, the procedure for settling claims and control over additionality, i.e. whether the instrument provided access to finance (Committee of Sponsoring Organizations of the Treadway Commission, 2023).

Intragroup forms of support, such as interest-free or preferential loans between related parties, capital contributions, guarantees, and combined schemes, required separate identification, as this was, where hybrid mismatches most often arise. When the same payment was treated differently in different jurisdictions, there was a risk of double deduction of expenses or deduction without corresponding taxation of income (Kahlenberg & Kopec, 2016). The OECD (2015) described typical scenarios of such mismatches and propose mechanisms for their neutralisation in internal law in order to restore symmetry in tax consequences. For corporate practice, this meant the obligation to unambiguously classify instruments according to the "return – reward" matrix, verify the presence of related party characteristics, and align accounting logic with tax classification in the relevant countries. All critical assumptions, from the justification of interest-free status to the method of reflecting the difference between the nominal amount and the present value, must be disclosed directly in the notes.

Process models for assisting begin with setting business objectives and verifying market conditions, and end with transparent monitoring of the fulfilment of obligations. At the operational level, this equated to a sequence of actions from initiation to closure: determining the type of assistance and verifying the grounds, formalising the terms and conditions in contracts and primary documents, classifying and evaluating based on the time value of money, disclosing material assumptions and monitoring the targeted use. At the internal control level, it was advisable to use recognised components of the control system: environment, risk assessment, control measures, information and communication, and monitoring to provide an evidence base for audit and reproducibility of decisions. Where aid involved public funds or state guarantees, the European Commission's regulatory practice additionally required transparency of objectives, proportionality of instruments and

accountability of results, making proper disclosure and quality documentation an integral part of the process (Council Directive (EU) No. 2016/1164, 2016). It was worth noting the requirement to test the sensitivity of key assumptions, primarily the discount rate, as well as to disclose the consequences of non-compliance with the conditions, as these two elements were most often the subject of comments by reviewers and supervisory authorities. As a result, it was possible to build a comprehensive framework: from defining the place of financial assistance in financial relations and distinguishing it from loans and dividends to classification based on repayment and remuneration criteria, identification of intra-group risks, and description of process steps and control points.

Regulatory framework for accounting and taxation of financial assistance transactions

The system for regulating financial assistance transactions can be viewed as three interrelated areas: private law (contracts and primary documents), taxation (classification of income/expenses and tax differences) and standards (national and international financial reporting standards). In the private law plane, key definitions were stipulated in the Civil Code of Ukraine (2003), according to which a loan was the provision of money or other material things with an obligation to return them, while a gift was free of charge and does not require any reciprocal action on the part of the recipient. This dichotomy of "repayment" and "gratuitousness" immediately affected the accounting classification and tax consequences. In practice, this required clear formulation of the terms and conditions in the contract, recording of the business purpose and a complete set of primary documents (contract, schedules, acts, internal approvals).

In contrast, the Tax Code of Ukraine (2010), in particular Article 14, unified terminology and sets a framework for determining the tax base (Law of Ukraine No. 1946-IX, 2021). This regulatory document used the categories of "repayable financial assistance" (funds provided without interest or other fees for use, but subject to repayment) and "non-repayable financial assistance" (amounts provided without a reciprocal obligation under gift agreements or similar agreements, or without an agreement). The classification of a transaction into one category or another determined the procedure for inclusion in income or expenses and the occurrence of tax differences at the end of the reporting period, especially regarding unrecovered amounts from non-taxpayers or beneficiaries of tax privileges. To ensure the legitimacy of their approaches, auditors require not only a contract, but also correspondence, internal decisions and an explanation of the economic substance of the transaction. In the standard plane, Ukrainian accounting provisions (standards), P(S)BO, establish the basic logic: financial instruments were recognised at fair value upon initial recognition, including transaction costs

(Order of the Ministry of Finance of Ukraine No. 318, 1999). At the same time, liabilities were classified and measured in accordance with the terms of the contract, and income was recognised on an accrual and matching basis. For financial assistance, this meant that repayable amounts were liabilities of the borrower (financial assets of the lender); non-repayable amounts remained on the recipient's side, and income or targeted receipts (depending on the terms and purpose) remained on the provider's side. The notes to the financial statements required disclosure of the types of instruments, terms, risks and elements of accounting policy for recognition and measurement.

International Financial Reporting Standards (IFRS) and International Accounting Standards (IAS) detailed special cases that most often arise in practice: preferential/interest-free intra-group loans, government grants and aid, as well as transactions with related parties (Tawiah & Soobaroyen, 2022). For example, International Financial Reporting Standard 9 (IFRS 9) "Financial instruments" (2012) required financial assets or liabilities to be initially measured at fair value; if a loan was issued or received on terms below market conditions, the difference between fair value and nominal value was recognised on the date of recognition and subsequently "disclosed" through amortised cost and effective interest rate. In addition, the standard established an expected credit loss approach: a provision was formed from day one and adjusted to reflect changes in credit risk over the life of the instrument. The approach also applied to liabilities for financial guarantees provided and undrawn credit facilities. The 2024 post-implementation review confirmed that the model works as intended, although it required more accurate disclosures and improved explanations regarding modifications, write-offs and amortised cost, which was crucial for the transparent presentation of preferential loans and group guarantees (IFRS, n.d.).

International Accounting Standards Board (2001) outlined the rules for grants and broader "government assistance". According to the standard, recognition was possible only if there was reasonable assurance that the conditions will be met and the grant will actually be received; grants related to expenses were recognised in profit systematically against the corresponding expenses, and grants related to assets were recognised either through income over time or by reducing the carrying amount of the asset. Separately, International Accounting Standard 20 (IAS 20) clarified that loans and benefits from loans at below market rates were forms of government support where the "preferential" component was measured as the difference between the initial carrying amount under IFRS 9 and the funds received. Disclosures of accounting policies, the nature and extent of support, and unfulfilled conditions were critical for reporting purposes. Another standard applies, where financial assistance was related to intra-group transactions. This concerned the disclosure of transactions with

related parties under International Accounting Standard 24 (IAS 24) "Related Party Disclosures" (2012). According to this standard, it was necessary to identify control/joint control relationships, disclose the nature of transactions, balances and key terms (including interest-free loans, guarantees, collateral), as well as remuneration of key management personnel. This reduced the risk of "hidden" transfers of value and helped explain to investors the economic substance of preferential loans, guarantees or capital contributions within the group.

According to International Financial Reporting Standard 9 (IFRS 9) "Financial Instruments" (2012), a preferential or interest-free loan between related parties was recognised at fair value on the date the funds are received. If, for example, a parent company provided a subsidiary with an interest-free loan with a nominal value of UAH 10 million for three years, and the market rate was 15%, the loan was recorded at a present value of approximately UAH 6.6 million, and the difference of UAH 3.4 million was recognised as a capital contribution as a form of support. Subsequently, the discount was "unwound" through the accrual of interest expense at the effective rate, which ensured a transparent reflection of the economic benefit of the concession. For a financial asset on the provider's side, an expected credit loss provision was formed from the first day (Stage 1), with subsequent review depending on changes in credit risk. Following International Accounting Standards Board (2001), government grants were recognised only when there was reasonable assurance that all conditions will be met. For example, a grant of UAH 2 million for the purchase of equipment worth UAH 10 million can be presented in two ways: as deferred income, recognised gradually over the depreciation period of the asset, or by reducing its carrying amount. If the support was provided in the form of a preferential government loan, the difference between the fair value of the loan (determined in accordance with IFRS 9) and the funds actually received was treated as government assistance and recognised in accordance with IAS 20.

In the case of a financial guarantee between related parties (IFRS 9, International Accounting Standard 24 (IAS 24)), the guarantor recognised an estimated liability at fair value and subsequently reviews it based on

expected credit losses. For the beneficiary, the effect of the guarantee was usually reflected in a lower contractual interest rate on the loan (which affected the subsequent calculation of the effective interest rate and amortised cost); no separate asset from the guarantee was recognised unless a fee has been paid for it. In the notes to the financial statements, both parties must disclose the nature of the relationship, the terms of the guarantee, the collateral and the risk assessment methodology. These examples demonstrated how the principles of IFRS 9, IAS 20 and IAS 24 were translated into specific accounting procedures and disclosures, ensuring consistency between financial and tax logic in reporting. The European and international regulatory framework warned against hybrid mismatches, where the same payment was treated as an expense in one jurisdiction and not included in income in another. Council Directive (EU) No. 2016/1164 (2016) in the European Union and the Recommendations for the implementation of the BEPS Action Plan (base erosion and profit shifting) described neutralising mechanisms designed to restore tax symmetry (Ministry of Finance of Ukraine, 2016; European Commission, 2017). From a practical point of view, this meant that policies and notes should explicitly explain the basis for classifying instruments (debt or equity), remuneration terms and the existence of guarantees/collateral to minimise tax risks in cross-border schemes. Requirements for internal control and documentation were addressed separately. Based on the five components of the control environment (environment, risk assessment, control activities, information and communication, monitoring), the reproducibility of decisions on classification, discounting, impairment tests and the fulfilment of grant conditions was ensured (Committee of Sponsoring Organizations of the Treadway Commission, 2023). Managers and supervisory bodies should be able to trace the document's "path" from the initiation and verification of market conditions to its reflection in accounting and disclosures that track key assumptions (primarily the discount rate) and the consequences of non-compliance. To summarise the rules into a single applied framework, a brief comparison of the accounting and tax implications for typical forms of financial assistance can be made (Table 1).

Table 1. Comparison of accounting and tax implications for typical forms of financial assistance

Form of transaction	Initial recognition (IFRS/P(S)BO)	Further valuation/profit or loss	Mandatory items to be disclosed in the notes
Revolving assistance on market terms (loan)	The enterprise recognises the liability at fair value on the date of receipt of funds; at the same time, the provider recognises a financial asset for the same amount. This means that the movement of funds is accompanied by the emergence of debt with a defined repayment schedule and interest remuneration	Subsequently, the amount of debt is recorded at amortised cost with interest accrued on an effective interest rate basis; the lender recognises interest income accordingly, and the asset is tested for expected credit losses. Interest expense/income is recognised in the income statement, and the balance of the liability/asset at the end of the period is recognised in the statement of financial position	The parties must disclose the key terms of the agreement, including the interest rate and terms; the risks of non-payment, valuation methods and changes in the carrying amount during the period should be explained, and if there is a relationship, the nature of the relationship and its impact on the terms of the agreement should be described

Table 1, Continued

Form of transaction	Initial recognition (IFRS/P(S)BO)	Further valuation/profit or loss	Mandatory items to be disclosed in the notes
Revolving assistance on preferential or interest-free terms	The entity recognises the liability at fair value, which is usually lower than the nominal amount; the difference between the nominal amount and fair value is immediately identified as a separate economic effect (e.g., income from support or contribution to capital within the group). This means that the "preferential component" is not hidden in the body of the debt, but is transparently reflected from the outset	Subsequently, the liability is accounted for at amortised cost with the discount being unwound to the nominal value through the recognition of interest expense; the lender symmetrically recognises interest income and a provision for expected losses on the asset. The effect of initial discounting, interest movement during the term and the balance of debt at the end of the reporting date are shown in the financial statements	The notes should justify the choice of discount rate, describe the nature of the benefit and its amount at the date of initial recognition, indicate the impact on equity or income, and explain why the terms of the transaction are considered non-marketable; for intra-group transactions, the relationship between the parties and the pricing logic should be disclosed separately
Non-repayable assistance (grant or subsidy)	The recipient recognises the support only when there is reasonable assurance that all conditions will be met and the funds will actually be received; this means that a formal decision to grant support is not yet sufficient grounds for recognising income without verifying the conditions	If the assistance compensates for expenses, income is recognised systematically in the periods in which the corresponding expenses are incurred; if the assistance is related to an asset, it is shown either through gradual recognition in income together with depreciation or through a reduction in the carrying amount of the asset. The financial statements should show the timing of income in relation to expenses or depreciation of the asset	It is necessary to disclose the accounting policy regarding the method of presentation (through income or through a reduction in the value of the asset), describe the conditions and restrictions on the use of funds, indicate existing unfulfilled obligations and risks of return, and quantitatively show the balance of undisputed amounts at the end of the period
Intragroup interest-free loans and guarantees	The recipient entity recognises the liability at fair value and, in the case of support from the parent company, may attribute the difference from the nominal value to equity as a contribution from the owner; the provider recognises a financial asset or liability under the guarantee. This means that the economic substance of the support is reflected separately from the debt component	Subsequent accounting is based on amortised cost with recognition of "implicit" interest; an estimated liability is formed for the financial guarantee, which is reviewed based on expected payments. Interest effects, changes in the valuation of guarantees and intragroup balances are reflected in the financial statements	The nature and level of control between the parties, financing terms, collateral and guarantees, approach to determining fair value and discount rates should be disclosed, and an explanation should be provided of how the company prevents tax risks, in particular hybrid mismatch risks in cross-border structures

Source: Ministry of Finance of Ukraine (2016), European Commission (2017), Committee of Sponsoring Organizations of the Treadway Commission (2023), National Bank of Ukraine (2024), M. Fan et al. (2025), P.V. Thyayib (2025)

Thus, the regulatory framework established a specific sequence of actions. At the contract level, clearly defined the nature of the transaction (repayment/gratuitousness, marketability, guarantees), established the terms and conditions, and supported them with primary documents. At the accounting level, classify and measure at fair value upon initial recognition, with subsequent measurement at amortised cost, considering the effective rate and provision for expected losses for assets; for grants, systematically match income and expenses or adjust the value of the asset. At the disclosure level, explained accounting policies, significant assumptions (primarily the discount rate), related parties and unfulfilled conditions. At the tax level, applied the definitions of the Tax Code of Ukraine (2010) to the content of the transaction, track temporary and permanent differences, and check cross-border transactions for hybrid mismatches. This procedure synchronised civil law

grounds, accounting logic and tax consequences, reducing the risks of misclassification and claimed by regulatory authorities.

Organisation of accounting for financial assistance transactions at the enterprise level

The organisation of financial assistance transactions starts with a well-defined policy that established the sequence of actions from initiation to closure of the transaction and identified those responsible for finance, legal support, accounting and internal audit. At the initiation stage, the business objective and type of assistance (repayable or non-repayable; market or preferential) were formulated, after which the initial assumptions for the assessment were agreed: discount rate, payment schedules, collateral, early repayment terms, and control of the intended use. The agreement and the related package of primary documents (internal decisions, cash flow

schedules, confirmation of use) must directly reflected these conditions, as it was the actual content of the transaction that determined its accounting classification and subsequent disclosure. The internal control system was based on the five components of the Committee of Sponsoring Organizations of the Treadway Commission (2023) framework (control environment, risk assessment, control activities, information and communication, monitoring), which ensured the reproducibility of decisions regarding classification, discounting, contract performance and compliance with grant conditions; ultimately, this reduced the risk of errors and enhanced the confidence of users of financial statements.

In the cash flow statement, receipts and repayments of repayable assistance were classified as cash flows from financing activities. At the same time, interest payments and interest income were reflected in accordance with the rules specified in the latest amendments (updated link to operating profit and clarified requirements for interest classification), which improved comparability between companies (IFRS, 2025a). To ensure transparency, the classification of cash flows should be linked to contractual terms and accounting policies in the notes so that users can trace the entire "chain" from contract to reporting. On the date of receipt of funds, repayable assistance was recognised as a financial liability at fair value, including transaction costs. For market loans, this amount was close to the nominal value, and for preferential or interest-free loans, it was the present value of future payments calculated at the borrower's market rate. Subsequently, the liability was accounted for at amortised cost using the effective interest method, which "unwinds" the initial discount to par value through the uniform recognition of interest expense over time, while modifications of terms, write-offs or derecognition were reflected in accordance with the criteria of the standard (International Financial Reporting Standard 9 (IFRS 9)..., 2012).

Revolving financial assistance (loan, credit, advance with mandatory repayment) was recognised as a liability in the balance sheet (under "long-term bank loans" or "other current liabilities") with subsequent recognition of interest expense in the statement of financial performance. If the deferral exceeded 12 months, under IFRS 9, such assistance was recognised as a financial instrument, and the difference between the nominal and present value was discounted and accounted for as an element of interest expense, reflecting the effective interest rate in accordance with the amortised cost method (International Financial Reporting Standard 9 (IFRS 9)..., 2012). Non-repayable financial assistance, on the other hand, was recognised as other operating income in the period, in which the funds were received (under "other income" in the income statement). If the source of assistance was a related party or parent company, the amount may be reclassified as additional capital (as a contribution from owners without increasing

the authorised capital) in accordance with International Accounting Standard 1 (IAS 1) "Presentation of Financial Statements" (2012) and International Accounting Standard 32 (IAS 32) "Financial Instruments: Presentation" (2012). Where financial assistance was provided in the form of a guarantee, compensation or cost coverage, its classification depended on whether it created a legal obligation or deferred income. For example, a guarantee received without payment was recognised as deferred income with gradual recognition of income over the term of the guarantee, and compensation for expenses was recognised as other income simultaneously with the recognition of the expenses being compensated. For income tax reporting, these differences were critical: repayable assistance created a temporary difference through the recognition of interest and discount, non-repayable assistance created a permanent difference as income that does not result in a tax adjustment to the financial result, and contingent assistance was a potential subject for review for hybrid mismatch.

If assistance was provided within a group on non-market terms, the difference between the nominal and fair (discounted) value at the recipient may be reflected in equity as a contribution from the owner, when the economic substance of the transaction was capital support (Hoor, 2023). On the provider's side, this difference was classified as an investment in a subsidiary or a corresponding element of capital. This approach was consistent with the logic of initial measurement and subsequent accounting for financial instruments and required transparent disclosure of assumptions about the discount rate and terms (International Financial Reporting Standard 9 (IFRS 9)..., 2012.). At the same time, the entity must disclose the risks and valuation methods for instruments, including a table of reserve movements and a qualitative description of the credit risk management process. The requirements for such disclosures were contained in a separate standard on financial instruments (IFRS, 2025b). It was essential for users of financial statements that typical business transactions (interest accrual, principal repayment, exchange rate differences) were consistent with the schedules and terms of contracts, and that the tax implications of the interest portion and possible exchange rate differences were explained in the section on tax differences.

Irrevocable support was recognised only, when there was reasonable assurance that the conditions will be met and the resources will actually be received. If the assistance compensated for expenses, the income was recognised systematically in the periods, in which the corresponding expenses were incurred; if it was related to an asset, two approaches were permitted: through deferred income with gradual transfer to profit together with depreciation of the asset, or through a reduction in its initial value, which will result in lower depreciation charges in the future. Breach of the terms and conditions results in the recognition of a repayable liability and

corresponding adjustments in the financial statements. The following notes were essential for users: the nature and extent of the support, unfulfilled conditions, the method of presentation (through income or reduction in the value of the asset) and the timing of recognition. From a cash flow perspective, non-repayable receipts were reported in the section that corresponds to the nature of the cash flows being financed (operating or investing activities), ensuring consistency between the form of assistance and its economic purpose (IFRS, 2025a).

Interest-free loans, guarantees, capital contributions and combined schemes within a group required increased classification and disclosure discipline (Pappas *et al.*, 2024). If a parent company provided a subsidiary with an interest-free long-term loan, the subsidiary initially recognised a liability at fair value (through discounting), and the difference from the nominal value was attributed to capital as an owner's contribution; the amount was then "unwound" through the accrual of internal interest. This approach followed from the requirements for initial measurement and amortised cost. At the same time, full disclosure of related parties was crucial for users: the nature of control relationships, terms, collateral, rates, outstanding balances and signs of subsidisation (International Financial Reporting Standard 9 (IFRS 9)..., 2012). For financial guarantees, the guarantor recognised an estimated liability with subsequent revision depending on expected payments, and the beneficiary reflected

the corresponding effect and interconnection with the loan instrument. The risk of misclassification was most common: a transaction was presented as a loan, but in essence it functions as a capital contribution (or vice versa). To avoid such situations, it was advisable to explicitly establish a "return on reward" matrix in the policy as a test for distinguishing debt from equity, as well as to require disclosures that can be used to assess the marketability of the terms and conditions and the impact on the financial result and capital structure. At the same time, accounting judgements should be consistent with risk disclosures and financial instrument valuation methods (IFRS, 2025a).

Therefore, accounting techniques can be reduced to verifiable steps: policy and document flow recorded the economic substance of transactions, measurement and recognition ensured accurate reflection of value over time, and disclosure and internal control provided the user with a complete picture of the impact on liquidity, capital and risks. All statements and approaches here were based on modern requirements for accounting for financial instruments, grants, disclosures and cash flow statements, as well as on generally accepted principles for building an internal control system. An applied study of the application of accounting and taxation rules to real transactions was conducted at JSC "Ukrnafta". The dynamics of the company's profits, taxes paid and dividends for 2023-2024 were shown in Figure 1.

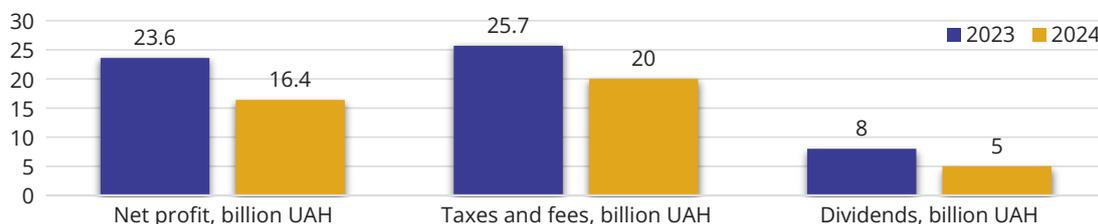


Figure 1. Dynamics of profits, taxes paid, and dividends of JSC "Ukrnafta" in 2023-2024

Source: Ukrnafta (2024a), Ukrnafta (2024b), Ukrnafta (2025b)

According to the results of 2023, JSC "Ukrnafta" confirmed a net profit of UAH 23.6 billion based on the results of an independent audit. In 2024, net profit amounted to UAH 16.38 billion, which can be used for a comparison of profit distribution policy and tax liabilities within 2023 and 2024. According to corporate report Ukrnafta (2024b), JSC "Ukrnafta" transferred UAH 25.7 billion in taxes and fees for 2023 (UAH 20 billion in 2024) and paid dividends totalling over UAH 8

billion according to schedule; in February 2024, the first tranche of UAH 3.9 billion was transferred to the state budget. According to the results of 2024, dividends to the state budget amounted to UAH 5 billion. In terms of this enterprise, the key event for accounting and tax logic was the settlement in December 2020 of existing tax arrears through a related package of agreements with Naftogaz of Ukraine. Figure 2 showed the oil and gas production figures for JSC "Ukrnafta" in 2024.

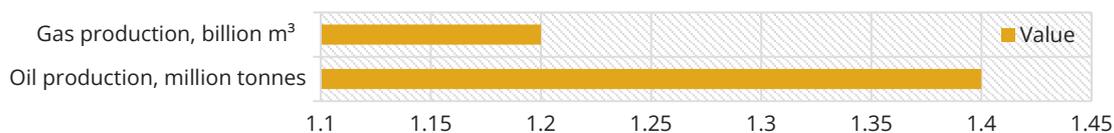


Figure 2. Oil and gas production volumes of JSC "Ukrnafta" in 2024

Source: Ukrnafta (2025a)

JSC “Ukrnafta” transferred UAH 28.9 billion to a special fund of the state budget to cover tax debt, while JSC “Naftogaz” paid UAH 15.1 billion for 2.061 billion m³ of gas produced in 2006 and provided an advance payment of UAH 23.5 billion for future gas production; at the same time, JSC “Ukrnafta” repaid UAH 2.5 billion of a short-term loan and paid UAH 3.9 billion of current value-added tax (VAT) and UAH 3.3 billion of advance income tax (Ukrnafta, 2020). For accounting purposes, this was a package of different types of instruments: a short-term loan (financial instrument), commercial payment for gas supplied and prepayment for future period products (contractual settlements with the customer), as well as targeted budget payments (tax settlements). It was necessary to emphasise the correct classification: the prepayment of UAH 23.5 billion was a contractual obligation under IFRS 15 (the obligation to supply gas in future periods), and if there was a significant financing component, the transaction price was adjusted with the recognition of the interest component over the term of the obligation. This was not a financial liability within the meaning of IFRS 9, so the discount was amortised within the IFRS 15 revenue model. The second dimension was the reconciliation of accounting judgements with the “physical” dynamics of the business. In 2024, JSC “Ukrnafta” increased oil production to 1.418 million tonnes (+0.6% compared to 2023) and gas production to 1.17 billion m³ (+6.5% compared to 2023), despite prolonged power outages that limited mechanised production (Ukrnafta, 2025a). This production stability supported the assumption that contractual obligations under the prepayment agreement can be met, justified the rates used to estimate the significant financing component in revenues, and reduced the risk of modifications to the terms that could require a revaluation of liabilities or adjustments in the notes.

From the point of view of tax consequences and disclosures, the “profit, taxes, dividends” block served as an indicator of proper classification and completeness of notes. For 2023, UAH 25.7 billion in taxes and over UAH 8 billion in dividends; for 2024, dividends of UAH 5 billion with a profit of UAH 16.38 billion. The following were expected in the notes to the financial statements: a description of the accounting policy for classifying the interest component by significant financing component in IFRS 15; detailed of key contracts with related parties (rates, terms, collateral, outstanding balances) under IAS 24; reconciliations between accounting and tax accounting for temporary and permanent differences (Dividend payments complete..., 2024). Another example of systematic cash flows to the budget was the payment of 1.074 billion UAH from the profits of the Private Joint-Stock Company “Ukrnaftoburinnya” for 2024, which was managed by JSC “Ukrnafta” (Ukrnafta, 2025b). For consolidated reporting, this was a separate distribution channel, which must be reflected in disclosures about related parties and the movement of

profit/dividend shares. In summary, it was worth noting that in 2023-2024, JSC “Ukrnafta” demonstrated an exemplary, verified case model for accounting and taxation of financial assistance transactions.

Taxation of financial assistance and neutralisation of hybrid mismatches

Taxation of repayable and non-repayable financial assistance in Ukrainian practice was based primarily on the definition in the Tax Code of Ukraine (2010): financial assistance may be provided on a non-repayable or repayable basis; non-repayable assistance includes funds under gift agreements, reimbursement of bad debts after their cancellation, as well as debts not collected after the expiry of the limitation period (Main Department of the State Tax Service in Vinnytsia region, 2024). This distinction determined the tax consequences: non-repayable assistance to the recipient generally constituted income, while repayable assistance created a debt obligation with subsequent consideration of interest expenses or the effect of a significant financing component in the case of deferred payments. Repayable assistance, formalised as a loan, affects the income tax base through the rules on interest differences and the debt-to-equity ratio.

Accounting for and taxing non-repayable assistance required special attention to the contractual nature and source of funds. If funds were received from related parties or within a group, transfer pricing rules may apply, as well as verification of the business purpose of the transaction. Cross-border intra-group payments interest, guarantee fees, support compensation, and impose an additional layer of compliance through international standards for neutralising hybrid mismatches. The OECD’s recommendations under Action 2 of the BEPS Plan required jurisdictions to neutralise the effects of schemes that result in double deduction of expenses or “deduction without inclusion in income” due to differences in the classification of instruments or entities. These approaches have formed the basis for European Union rules, in particular Council Directive (EU) No. 2017/952 (2017), which established the obligation to deny a deduction in the payer’s country or to include the amount in the recipient’s income depending on the type of mismatch, and also contained a special rule for “reverse hybrids” and dual residency situations (OECD, 2015). For the taxpayer, the practical requirement was simple: document that the payment did not result in a hybrid mismatch in the chain of transactions and, if necessary, adjusted the accounting based on the primary jurisdiction of “denial/inclusion”. Lastly, intra-group financial transactions must comply with the arm’s length principle not only in terms of interest rates but also in terms of the appropriateness of the instrument itself (Rathke, 2023). The OECD (2015) guidelines on financial transactions described in detail how to justify the marketability of intercompany loans, guarantees, letters of support and intra-group cash pools. For

Ukrainian taxpayers, this meant the need to compile a complete dossier: the borrower's creditworthiness, comparable transactions, adjustments for collateral and subsidisation, as well as an explanation of why financial assistance, rather than a capital contribution or advance payment, corresponded to the economic substance of the transaction. In transfer pricing documentation, this should appear as a logical chain: financing purpose – choice of instrument – valuation method – numerical result – tax implications.

Additional compliance requirements apply to payments abroad: reduced tax rates on non-resident income may only be applied if the status of beneficial owner was confirmed and there was no abuse of the advantages of conventions. Ukrainian court rulings and explanations from tax authorities emphasised that the beneficiary must be the actual recipient of the income, not a transit link, and verification was conducted incorporating the general anti-abuse approaches of the BEPS Plan (the "principal purpose test"). For financial assistance transactions, therefore, the formal existence of a contract was not sufficient; economic logic and transparent disclosure of the ultimate beneficiary were required (State Tax Service of Ukraine in Odesa region, 2023). In reporting, this involved detailing two levels of disclosure: identifying tax differences arising between accounting and tax accounting (in particular, regarding accrued but unpaid interest, discounts, and non-refundable receipts), and an explanation of the methodology for their adjustment in Appendix RI to the corporate income tax return. For repayable financial assistance, the adjustment was made by increasing the financial result by the amount of excess interest above the limit specified by the thin capitalisation rules, or by reducing it by the amount of recognised income at the effective interest rate. For non-repayable assistance, on the contrary, if it was not recognised as income in accounting, the financial result shall be increased by the corresponding amount. In conclusion, it should be emphasised that the tax treatment of financial assistance was based on the correct initial classification (non-refundable/refundable; contractual obligation or financial instrument) to control interest rate differences and market conformity, and in a cross-border context, to prove the absence of hybrid mismatches and beneficial ownership status.

Discussion

In the national economy, the effectiveness of financial assistance was determined not only by its volume, but all by the quality of the accounting and tax architecture. Correct classification of repayable and non-repayable forms, differentiation between commercial subscriptions and financial instruments, reflection of the time value of money for deferred payments, reconciliation of accounting judgements with tax differences, and transparency of transactions with related parties transform aid into a manageable investment resource. In this

context, the results of the study showed that it was the discipline of contracts and primary documents, the established contours of internal control, consistent disclosure of conditions and sensitivity of estimates in the notes, as well as compliance with transfer pricing requirements and neutralisation of hybrid mismatches form a bridge between financial support and the real strengthening of liquidity, capital and tax stability of enterprises. The study by P. Kubera (2021) demonstrated the state aid instruments used during the crisis period: direct grants, tax deferrals, state guarantees, preferential loans, and equity participation. Notably, each instrument created a separate chain of accounting events, affects the recognition of income and expenses in different ways, and generated different tax consequences. The author concluded that a matrix of characteristics was needed to compare economic substance and legal form. This was consistent with the study, which used a matrix approach of "return – reward" and proposed process models from initial recognition to disclosure in the notes.

In contrast, T. Jafarli (2022) systematised European approaches to state aid during the pandemic, focusing on temporary legal frameworks, eligibility criteria, transparency and principles for phasing out support once the market stabilises. Considering various forms of aid, the study demonstrated how legal conditions and public commitments become part of companies' accounting policies and affect the recognition of income, expenses, and liabilities. These conclusions were confirmed by research on the importance of contractual terms, the distinction between non-repayable and repayable support, and the need to align tax treatment with disclosures on restrictions and intended use. A. Hozzman *et al.* (2023) traced how approaches to state aid for airlines changed during the coronavirus pandemic in the EU: from direct grants and guarantees to instruments with strict transparency conditions, restrictions on dividends and management remuneration, and requirements for reporting on the targeted use of funds. The study emphasised that the nature of the aid (repayable or non-repayable), the availability of payment deferrals and the conditions for exiting the programmes have different implications for accounting and taxation and require careful documentation. These conclusions correlated with the study in terms of the priority of correct classification, the requirement for completeness of notes and the recording of contingent restrictions that affected tax differences and profit distribution policy.

At the same time, B. Engelmann & H. Pham (2020) demonstrated that the transition from loss assessment to the expected credit loss model under international financial reporting standards and the American expected loss model changes the income and expense profile of banks due to a different trajectory of provisioning and different risk sensitivity. For financial assistance operations, this meant the need to record the level of credit risk at the time of initial recognition, document

assumptions about the recipient's solvency, construct an effective interest rate for deferred payments, and disclose the sensitivity of estimates in the notes. A comparison with the study showed complete consistency in approaches: the classification of repayable assistance, discounting and separation of the interest effect from risk adjustments were implemented in a similar methodological manner. E. Gschossmann *et al.* (2025) revealed the essence of the issue related to how European initiatives to equalise the tax treatment of debt and equity and introduce a global minimum tax rate change the effective rates and incentive structure for corporate groups. Following the authors, the reduction in the tax advantage of debt financing shifts the optimal mix between loans and capital contributions, increasing the requirements for justifying the marketability of intra-group loans and for transparency of disclosures. This was confirmed by the findings of the study: recommendations on choosing the form of aid based on economic substance, the priority of full disclosures on rates, terms and collateral, and warnings about tax differences were consistent with the practical conclusions of the study.

At the same time, S. Hansen *et al.* (2023) emphasised how the rules for expected credit losses under international financial reporting standards affected the cyclicity of provisions: early recognition of losses mitigated peaks in provisioning during crisis periods, but increased the requirements for the quality of macroeconomic assumptions and procedures for their revision. For financial assistance in the form of loans or guarantees, this directly implied continuous monitoring of credit risk throughout the term of the agreement, a clear distinction between interest income and changes in provisions, and detailed explanations in the notes. The authors' proposed organisation of accounting, internal control and documentation of assumptions was consistent with the logic demonstrated in the study and reinforced the conclusions about the transparency of tax consequences. A study conducted by G. López-Espinosa & F. Penalva (2023) using the Spanish banking system as an example demonstrated the impact of the introduction of international financial reporting standards and the crisis period on lending and regulatory capital. The authors showed that early recognition of expected credit losses changes the dynamics of reserves and interaction with capital buffers, and thus affected the cost of financing and the structure of loan terms. The study's emphasis was consistent with the research conducted in terms of the need for continuous credit risk assessment for preferential and interest-free forms of support, correct discounting and explanation of the sensitivity of estimates in the notes.

In contrast, B. Peeters & L. Vanneste (2020) examined hybrid financial instruments in the context of the OECD's (2015) action plan. The study demonstrated how different tax treatments of the same instrument in different jurisdictions lead to inconsistencies that must

be neutralised by refusing to deduct or include it in income. This analysis fully correlated with the study conducted, where for intra-group loans, guarantees and capital contributions, marketability checks, absence of hybrid effects and completeness of disclosures were proposed in order to minimise tax risks and ensure compliance. O.R. Hoor (2020) highlighted the reverse hybrid mismatch rule as a mechanism for neutralising schemes, where differences in the classification of instruments or entities result in the non-inclusion of income or double deduction of expenses. The study consistently demonstrated that proper structuring of intra-group financial instruments and full disclosure made artificial tax advantages impossible and reduce the risk of adjustments. These conclusions confirmed a direct correlation with the study: the requirement to avoid hybrid effects, describe in detail the rate, term, collateral and links between the parties, and verify the business purpose of transactions, was reflected in practical recommendations and corresponded to the approach proposed by the author.

In the research on the beneficial owner of dividend income, B. Kuźniacki (2025) revealed how the determination of the actual recipient affected the application of international conventions on the avoidance of double taxation and access to reduced tax rates, when paying income abroad. The study emphasised that formal intermediation without economic control does not entitle one to benefits, and proving beneficiary ownership status required comprehensive evidence. The conclusions correlated with the study on intra-group financial transactions, which emphasised transparent documentation of relationships, conditions and business purposes to avoid tax adjustments and ensure predictability of payments. In conclusion, it was worth noting that the effectiveness of financial assistance operations was determined not by their volume, but by the quality of accounting and tax organisation. When assistance was correctly classified (repayable or non-repayable), deferred payments were reflected, incorporating the time value of money, credit risk was assessed continuously, and noted to the financial statements disclose the terms, rates, maturities and sensitivity of estimates, the enterprise obtained transparent financial results without artificial fluctuations. Compliance with requirements for related party transactions, marketability of intra-group instruments, transfer pricing and neutralisation of hybrid mismatches minimised fiscal risks and aligned practices with European rules. Within this framework, financial assistance became a manageable tool for supporting liquidity and capital and strengthens the long-term sustainability of the business without conflicts between accounting and tax dimensions.

Conclusions

The study provided a comprehensive overview of the organisation of accounting and taxation of financial

assistance and proved that the effectiveness of transactions depended on the quality of the accounting and tax architecture. Correct classification of aid, differentiation between prepayments and financial instruments, reflection of the time value of money, and consistent documentation ensured transparent recognition and assessment. The significance of process organisation had been empirically confirmed: effective document flow, clear responsibility, and control of flows reconcile financial and tax data. For repayable aid, discounting and credit risk assessment were key, while for non-repayable aid, correct allocation to income or targeted financing was key. Systemic consequences for taxation manifested themselves in the timely formation of temporary and permanent tax differences resulting from discounting, provisioning and classification of payments. The study determined that intra-group instruments such as interest-free loans, guarantees and capital contributions required justification of marketability, a transparent description of rates, terms, collateral and interrelationships between the parties, as well as verification of the absence of hybrid mismatches. Together, this ensured the predictability of fiscal consequences, consistency of the tax base and reduced the risk of additional charges.

The case study of JSC "Ukrnafta" demonstrated that preferential or interest-free advances, counter-settlement packages and large budget payments can be reliably tracked in financial statements provided that it was correctly classified and fully disclosed. A comparison of the dynamics of profit, taxes and dividends, as well as

operating indicators with accounting decisions, confirmed that high-quality notes (on the nature of instruments, discount rates, sensitivity of estimates and related party transactions) were key to user confidence and the stability of results over time. The conceptual and process model described links the choice of form of assistance to the principles and approaches to recognition, measurement, disclosure and taxation, supplemented by a list of control points for internal audit: from identifying the nature of the instrument to reconciling the income statement, cash flow statement and tax disclosures. The limitations of the study were related to the availability of detailed disclosures in public sources and the diversity of national practices in the interpretation of individual instruments. Further research should focus on validating approaches across a wider range of industries, comparing alternative disclosure policies for preferential loans and grants, modelling the long-term impact on the tax base and equity, and developing standard compliance checklists for intra-group financial transactions in a cross-border context.

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Conflict of Interest

None.

References

- [1] Chyzhevska, L., & Osipchuk, D. (2020). Statutory regulation of state aid accounting: International (IFRS) and national approach. *Problems of Theory and Methodology of Accounting, Control and Analysis*, 2, 61-69. doi: 10.26642/pbo-2020-2(46)-61-69.
- [2] Civil Code of Ukraine. (2003, January). Retrieved from <https://zakon.rada.gov.ua/laws/show/435-15/#Text>.
- [3] Committee of Sponsoring Organizations of the Treadway Commission. (2023). *Achieving effective internal control over sustainability reporting (ICSR): Building trust and confidence through the COSO internal control-integrated framework*. Retrieved from https://www.coso.org/_files/ugd/3059fc_a3a66be7a48c47e1a285cef0b1f64c92.pdf.
- [4] Council Directive (EU) No. 2016/1164 "Laying Down Rules Against Tax Avoidance Practices that Directly Affect the Functioning of the Internal Market". (2016, July). Retrieved from <https://surl.li/yyuwow>.
- [5] Council Directive (EU) No. 2017/952 "Amending Directive (EU) 2016/1164 as Regards Hybrid Mismatches with Third Countries". (2017, May). Retrieved from <https://eur-lex.europa.eu/eli/dir/2017/952/oj/eng>.
- [6] Engelmann, B., & Pham, H. (2020). Measuring the performance of bank loans under Basel II/III and IFRS 9/CECL. *Risks*, 8(3), article number 93. doi: 10.3390/risks8030093.
- [7] European Commission. (2017). *Fair taxation: Commission welcomes new rules to prevent tax avoidance through non-EU countries*. Retrieved from <https://ec.europa.eu/newsroom/ecfin/items/55245/en>.
- [8] Fan, M., Chen, D., & Lei, Y. (2025). How government accounting supervision affects corporate financialization? Evidence from random inspections by China's ministry of finance. *International Review of Economics & Finance*, 103, article number 104462. doi: 10.1016/j.iref.2025.104462.
- [9] Frolov, S., Orlov, V., Lozynska, O., & Shukairi, F. (2021). Strategic and tactical benchmarks for restructuring the financial system of Ukraine. *Economics of Development*, 20(1), 11-22. doi: 10.21511/ed.20(1).2021.02.
- [10] Gschossmann, E., Heckemeyer, J.H., Müller, J.M., Spengel, C., Spix, J., & Wickel, S. (2025). The EU's new era of "fair company taxation": The impact of DEBRA and Pillar Two on the EU Member States' effective tax rates. *International Tax and Public Finance*. doi: 10.1007/s10797-025-09886-9.
- [11] Hansen, S., Charifzadeh, M., & Herberger, T.A. (2023). The impact of IFRS 9 on the cyclicity of loan loss provisions. *The Journal of Corporate Accounting & Finance*, 35(2), 37-49. doi: 10.1002/jcaf.22669.

- [12] Hess, R.V., & Mills, L.F. (2025). Government assistance: A growing, underdisclosed financing source. *Accounting Horizons*, 39(1), 87-111. doi: 10.2308/HORIZONS-2020-098.
- [13] Hoor, O.R. (2020). The reverse hybrid mismatch rule in Luxembourg. *Tax Law Review*, 7(2), 1-8. doi: 10.3917/rdf.007.0001.
- [14] Hoor, O.R. (2023). The reverse hybrid mismatch rule: Considerations regarding alternative investment funds in Luxembourg. *European Investment Fund Review*, 3(1), 61-74. doi: 10.3917/eifr.003.0061.
- [15] Hoszman, A., Marciszewska, E., & Pasztaleniec, M. (2023). State aid for airlines in the EU: Policy changes during the COVID-19 pandemic. *Journal of Management and Financial Sciences*, 46, 77-88. doi: 10.33119/JMFS.2022.46.6.
- [16] IFRS. (2025a). *IAS 7 statement of cash flows*. Retrieved from <https://www.ifrs.org/issued-standards/list-of-standards/ias-7-statement-of-cash-flows.html/>.
- [17] IFRS. (2025b). *IFRS 7 financial instruments: Disclosures*. Retrieved from <https://www.ifrs.org/issued-standards/list-of-standards/ifrs-7-financial-instruments-disclosures/>.
- [18] IFRS. (n.d.). *Post-implementation review of IFRS 9 – impairment*. Retrieved from <https://www.ifrs.org/projects/completed-projects/2024/post-implementation-review-of-ifrs-9-impairment/>.
- [19] International Accounting Standard 1 (IAS 1) "Presentation of Financial Statements". (2012, January). Retrieved from https://zakon.rada.gov.ua/laws/show/929_013#Text.
- [20] International Accounting Standard 24 (IAS 24) "Related Party Disclosures". (2012, December). Retrieved from https://zakon.rada.gov.ua/laws/show/929_043#Text.
- [21] International Accounting Standard 32 (IAS 32) "Financial Instruments: Presentation". (2012, January). Retrieved from https://zakon.rada.gov.ua/laws/show/929_029#Text.
- [22] International Accounting Standards Board. (2001). *IAS 20: Accounting for government grants and disclosure of government assistance*. London: IFRS Foundation.
- [23] International Bank for Reconstruction and Development/The World Bank and FIRST Initiative. (2015). *Principles for public credit guarantee schemes for SMEs*. Washington, D.C.: World Bank Group.
- [24] International Financial Reporting Standard 9 (IFRS 9) "Financial Instruments". (2012, December). Retrieved from https://zakon.rada.gov.ua/laws/show/929_016#Text.
- [25] Jafarli, T. (2022). European state aid during COVID-19. *European Studies*, 9(2), 265-282. doi: 10.2478/eustu-2022-0024.
- [26] Kahlenberg, C., & Kopec, A. (2016). Hybrid mismatch arrangements – a myth or a problem that still exists? *World Tax Journal*, 8(1). doi: 10.59403/nt8e4x.
- [27] Kamynskiy, A., Versal, N., Petrovskiy, O., & Prykaziuk, N. (2023). Dynamic framework for strategic forecasting of the bank consumer loan market: Evidence from Ukraine. *Banks and Bank Systems*, 18(3), 87-100. doi: 10.21511/bbs.18(3).2023.08.
- [28] Kollruss, T. (2023). A hybrid entity structure for tax optimization of foreign direct investment in the U.S. *The Journal of Corporate Accounting & Finance*, 35(2), 147-156. doi: 10.1002/jcaf.22675.
- [29] Kubera, P. (2021). The state aid instruments in response to the COVID-19 crisis. *Journal of Organizational Management Studies*, 2021, article number 930488. doi: 10.5171/2021.930488.
- [30] Kuźniacki, B. (2025). Determining the beneficial owner of dividend income compared to other items of income in international taxation: Nihil sub sōle novum1. *Nordic Tax Journal*, 2024(1), 44-71. doi: 10.2478/ntaxj-2024-0004.
- [31] Lagovska, O., & Loskorikh, G. (2023). Accounting of state grants according to international financial reporting standards. *New Challenges in Accounting and Finance*, 10, 14-23. doi: 10.32038/NCAF.2023.10.02.
- [32] Law of Ukraine No. 1946-IX "On Amendments to the Tax Code of Ukraine and Other Laws of Ukraine On Stimulating the Development of the Digital Economy in Ukraine". (2021, December). Retrieved from <https://zakon.rada.gov.ua/laws/show/1946-20#Text>.
- [33] Lehenchuk, S., & Vyhovska, N. (2024). Accounting for government grants according to IAS 20: The problems and directions for improvement. *Accounting and Finance*, 1, 14-21. doi: 10.33146/2307-9878-2024-1(103)-14-21.
- [34] López-Espinosa, G., & Penalva, F. (2023). Evidence from the adoption of IFRS 9 and the impact of COVID-19 on lending and regulatory capital on Spanish banks. *Journal of Accounting and Public Policy*, 42(4), article number 107097. doi: 10.1016/j.jaccpubpol.2023.107097.
- [35] Main Department of the State Tax Service in Vinnytsia region. (2024). *Briefly about non-repayable or repayable financial assistance*. Retrieved from <https://vin.tax.gov.ua/media-ark/news-ark/798298.html>.
- [36] Ministry of Finance of Ukraine. (2016). *Recommendations for the implementation of the BEPS Action Plan (minimum standards)*. Retrieved from [https://mof.gov.ua/storage/files/2017_Roadmap_BEPS_UKRAINE_ua\(1\).pdf](https://mof.gov.ua/storage/files/2017_Roadmap_BEPS_UKRAINE_ua(1).pdf).
- [37] National Bank of Ukraine. (2024). *Financial stability report*. Retrieved from https://bank.gov.ua/admin_uploads/article/FSR_2024-H1_eng.pdf?v=14.
- [38] OECD. (2015). *Neutralising the effects of hybrid mismatch arrangements, action 2 – 2015 final report*. Paris: OECD Publishing. doi: 10.1787/9789264241138-en.

- [39] Order of the Ministry of Finance of Ukraine No. 318 "On Approval of the Accounting Regulation (Standard)". (1999, December). Retrieved from <https://zakon.rada.gov.ua/laws/show/z0027-00/ed19991231#Text>.
- [40] Pappas, K., Walker, M., Xu, A.L., & Zeng, C. (2024). Government subsidies and income smoothing. *Contemporary Accounting Research*, 41(3), 1477-1512. doi: 10.1111/1911-3846.12947.
- [41] Peeters, B., & Vanneste, L. (2020). The hybrid financial instruments: The effects of the OECD BEPS Action 2 report and the ATAD. *Intertax*, 48(1), 14-45. doi: 10.54648/taxi2020003.
- [42] Rathke, A.A.T. (2023). Profit shifting under the arm's length principle. *arXiv*. doi: 10.48550/arXiv.2309.13449.
- [43] Romenska, K., Chentsov, V., Rozhko, O., & Uspalenko, V. (2020). Budget planning with the development of the budget process in Ukraine. *Problems and Perspectives in Management*, 18(2), 246-260. doi: 10.21511/ppm.18(2).2020.21.
- [44] Rysin, V., & Pechenko, R. (2024). Structural changes in the financial services market in Ukraine: Impact of war. *Journal of Lviv Polytechnic National University. Series of Economics and Management Issues*, 8(1), 22-33. doi: 10.23939/semi2024.01.022.
- [45] Sadovska, I., & Nahirska, K. (2023). Features of accounting and taxation of targeted financing as part of grant funds. *Economy and Society*, 58. doi: 10.32782/2524-0072/2023-58-74.
- [46] State Tax Service of Ukraine in Odesa region. (2023). *Regarding the definition of the concept of beneficial owner of income*. Retrieved from <https://od.tax.gov.ua/media-ark/news-ark/print-667314.html>.
- [47] Tawiah, V., & Soobaroyen, T. (2022). The relationship between the adoption of international public sector accounting standards and sources of government financing: Evidence from developing countries. *Accounting Forum*, 48(2), 307-330. doi: 10.1080/01559982.2022.2151073.
- [48] Tax Code of Ukraine. (2010, December). Retrieved from <https://zakon.rada.gov.ua/laws/show/2755-17#Text>.
- [49] Thayyib, P.V. (2025). Tax avoidance strategies under radar: Policy considerations on U.S. multinational corporations operating in emerging markets. *Cogent Business & Management*, 12(1), article number 2507236. doi: 10.1080/23311975.2025.2507236.
- [50] Ukrnafta. (2020). *Ukrnafta has fully repaid its tax debt to the state*. Retrieved from <https://www.ukrnafta.com/en/ukrnafta-has-fully-repaid-its-tax-debt-to-the-state>.
- [51] Ukrnafta. (2024a). *Dividend payments complete for 2023*. Retrieved from <https://www.ukrnafta.com/en/dividend-payments-complete-for-2023>.
- [52] Ukrnafta. (2024b). *Ukrnafta's 2023 net profit reaches UAH 23.6 billion following international audit*. Retrieved from <https://www.ukrnafta.com/en/ukrnafta%E2%80%99s-2023-net-profit-reaches-uah-23.6-billion-following-international-audit>.
- [53] Ukrnafta. (2025a). *"Ukrnafta" increases oil and gas production for the second consecutive year, by 0.6% and 6.5%, respectively*. Retrieved from <https://www.ukrnafta.com/en/ukrnafta-increases-oil-and-gas-production-for-the-second-consecutive-year-by-0.6-and-6.5-respectively>.
- [54] Ukrnafta. (2025b). *The Ukrnafta transferred UAH 1.074 billion from the Ukrnaftoburinnya profit for 2024 to the budget*. Retrieved from <https://www.ukrnafta.com/en/the-ukrnafta-transferred-uah-1.074-billion-from-the-ukrnaftoburinnya-profit-for-2024-to-the-budget>.
- [55] Ukrnafta. (2025c). *Ukrnafta has paid dividends to the state budget: UAH 5 billion based on the results of 2024*. Retrieved from <https://www.ukrnafta.com/en/ukrnafta-has-paid-dividends-to-the-state-budget-uah-5-billion-based-on-the-results-of-2024>.
- [56] World Bank Group. (2024). *World Bank Group prepares major overhaul to guarantee business*. Retrieved from <https://www.worldbank.org/en/news/press-release/2024/02/27/world-bank-group-prepares-major-overhaul-to-guarantee-business>.
- [57] Zakharov, D. (2024). Implementation of the "Two-Pillar Solution" prospects in the international taxation system. *Problems of Theory and Methodology of Accounting, Control and Analysis*, 1, 20-24. doi: 10.26642/pbo-2024-1(57)-20-24.

Операції з фінансовою допомогою: міжнародні стандарти, податкові правила та організація обліку й оподаткування

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Анотація. Метою роботи було обґрунтування концептуальних принципів побудови обліку й оподаткування операцій фінансової допомоги з інтеграцією вимог міжнародних і національних стандартів, податкових правил та належних практик розкриття інформації. Методологічну основу становили аналіз норм Податкового та Цивільного кодексів України, нормативних документів національного законодавства, порівняльний огляд національних положень (стандартів) бухгалтерського обліку і міжнародних стандартів (визнання, оцінка, розкриття), контент-аналіз публічної звітності, теоретичне моделювання етапів надання поворотної і безповоротної допомоги. Емпіричні матеріали включали в себе звіти Національного банку України, Всесвітнього банку, Організації економічного співробітництва та розвитку. Отримані результати дозволили класифікувати фінансову допомогу (поворотна/безповоротна; внутрішньогрупова/зовнішня; ринкова/пільгова) як економічну одиницю, встановити послідовність первісного визнання та подальшої оцінки із відображенням вартості грошей у часі, окреслити вимоги до приміток (умови договорів, ставки дисконту, чутливість оцінок, операції з пов'язаними сторонами) і продемонструвати, як виникають та узгоджуються тимчасові й постійні податкові різниці. Досягнуті результати зведено у цілісну прикладну рамку: систематизовано класифікацію фінансової допомоги за матрицею «повернення – винагорода», узгоджено облікові підходи положень (стандартів) бухгалтерського обліку, міжнародних стандартів фінансової звітності із податковими нормами та сформовано алгоритм від ініціації до розкриття, включно з переліком первинних документів. На прикладі Акціонерного товариства «Укрнафта» продемонстровано відтворювану ідентифікацію операцій, узгодження зв'язку «прибуток – податки – дивіденди», типові тимчасові та постійні різниці. Практична цінність дослідження полягає у сформованому переліку контрольних точок для внутрішнього контролю (договірні умови, первинні документи, ринковість внутрішньогрупових інструментів, відстеження руху грошових коштів), а також у прикладних рекомендаціях щодо прозорого розкриття та нейтралізації податкових ризиків, включно з гібридними невідповідностями і трансфертним ціноутворенням

Ключові слова: міжнародні норми; пільгові позики; безповоротна допомога; повернення та винагорода; дивіденди