PUBLIC FINANCE

DOI: 10.15838/esc.2026.3.105.7
UDC 336.221, LBC 65.261.4

On the Impact of Personal Income Tax on Labor Migration

Anna V. TIKHONOVA
Financial University under the Government of the Russian Federation
Moscow, Russian Federation
e-mail: AVTihonova@fa.ru
ORCID: 0000-0001-8295-8113; ResearcherID: Q-5268-2017

Yulia V. MALKOVA
Financial University under the Government of the Russian Federation
Moscow, Russian Federation
e-mail: YuMalkova@fa.ru
ORCID: 0000-0002-6630-9065; ResearcherID: AFN-6567-2022

Abstract. The article proposes an original methodological approach to assessing the impact that changes in individual elements of the personal income tax have on migration flows. The subject of the study is personal income taxation instruments (PIT rates, tax residency criteria, the list of taxable incomes), as well as migration flows. The aim of the work is to substantiate directions for improving personal income taxation instruments in ways that give the Russian Federation a competitive edge in the competition for labor resources. The research methods employed include interval grouping, analytical grouping, cluster analysis (hierarchical and k-means), the cartographic method, and theoretical methods of juxtaposition and comparison. The resulting clusters made it possible to identify a relationship between migration processes and the competitiveness of individual income taxation, while a cross-country comparative analysis (covering data from 38 OECD countries) has substantiated the high competitiveness of Russia's

For citation: Tikhonova A.V., Malkova Yu.V. (2026). On the impact of personal income tax on labor migration. *Economic and Social Changes: Facts, Trends, Forecast*, 19(3), 123–143. DOI: 10.15838/esc.2026.3.105.7

PIT. As a result, the study finds that the changes introduced in personal income taxation (the adoption of a progressive scale, the change in the approach to taxing residents and non-residents) are unlikely to trigger negative consequences in the form of an outflow of labor resources abroad, yet at the same time they do not contribute to attracting the most valuable human capital. Recommendations are put forward for improving the taxation of highly qualified specialists. The methodological approach developed makes it possible to assess the potential migration-related consequences of changes to income taxes in countries around the world. The scientific novelty of the study lies in the original two-stage methodology for analyzing the influence of PIT elements on migration flows, as well as in formulating proposals for improving personal income taxation – specifically, adapting the tax scale and the approaches to applying tax deductions for highly skilled professionals to the demands of technological development. This would help attract the most valuable labor resources while also upholding the principles of tax equality.

Key words: income tax, labor flows, tax residency, tax rate, progressive taxation, tax competition, cluster analysis, highly skilled professionals.

Introduction

Since its inception, the personal income tax (PIT) scale in Russia has evolved from simple proportional rates to a complex multi-level model, which today serves not only as a mechanism for generating funds for the budget, but also as a crucial tool for social policy. Since January 1, 2025, the Russian Federation has implemented a new progressive tax rate (13–22%), which, according to some researchers, has brought Russia into the club of countries with "civilized" taxation (Balatsky et al., 2020) and should contribute to economic growth (Hatfield, 2015).

A progressive tax scale forms a balance between the fairness of the distribution of the tax burden and economic efficiency. However, in the context of dynamic socio-economic development, rising prices, changing consumer preferences, and demographic trends, the balance, competitiveness, and sustainability of personal income tax are being seriously analyzed in the scientific literature. It is noted that the use of social transfers as a tool of social policy is currently of significant importance (Novikova, 2024).

The realities of the modern economy reveal a number of problems that undermine both the balance and competitiveness of the national personal income tax. First, there is an imbalance between the personal income tax rate and the standard of living (Panskov, 2023). The rising cost of housing, healthcare, and education makes the 13% personal income tax rate significantly more burdensome for the middle class, even with the availability of deductions that do not cover the basic expenses of a family. Second, the existence of gaps between rates creates a ceiling effect, where people can artificially limit their income to avoid being classified in a higher tax category, which has been proven using instrumental economics methods (Pinskaya, Tikhonova, 2024; Pinskaya et al., 2025). This reduces economic flexibility and encourages informal practices. Such behavior undermines the very idea of progressivity (Balatsky, Ekimova, 2021). At the same time, most studies on the negative consequences of introducing a progressive tax rate focus on the risks of wages being "shadowed" (Smirnova, 2024; Boldenkov et al., 2025), which means that only one channel of "leakage" of the tax base is considered.

We focus on another channel: the migration outflow resulting from more favorable income tax conditions in competing countries. Research has repeatedly shown that lower individual income tax rates increase the inflow of foreign workers from other countries (Lyssiotou, Savva, 2021). However, the reverse effects of migration outflows are not clearly established. The focus on this type of migration is justified by the scientific community's attention to the exacerbated problem of the outflow of highly qualified specialists after 2022 (Fomkin, 2024). As a result, Russian researchers have observed a paradoxical trend in the last decade: the "brain drain" is being compensated by the "muscle drain" (Bezverbnyi, Mikryukov, 2019). We believe that, in this regard, the assessment of the personal income tax's competitiveness would be incomplete without analyzing the taxation conditions for individuals in the countries with the most active migration flows with Russia.

Based on the above, the aim of the research is to justify the directions for improving the taxation instruments for individuals, which will provide the Russian Federation with an advantage in the competition for labor resources. The hypothesis of the study is that the impact of the increase in the tax burden on individuals is limited and manifests itself mainly in relation to high-income and highly qualified groups of citizens who are interested in receiving personal and investment income in the country of income taxation. It is worth noting that in this article, we focus only on the taxation of active income (employment income, income from civil law contracts, etc.), as the new Russian progressive tax scale primarily affects this group of income (Panskov, 2025). We have concentrated our research on the following aspects of taxation: determining the taxpayer's status, the list of taxable active income based on the taxpayer's status, and the tax rate.

Methods and materials

The working method is based on two consecutive stages:

1) a quantitative study of the impact of income tax competitiveness on population migration processes;

2) theoretical analysis of the taxation conditions for individuals in countries that compete with the Russian Federation for labor resources.

Table 1 presents the research methodology in more detail.

Table 1. Research methodology

Stage	Characteristics of the stage research			
	Tool used	Method of analysis	Nature of the data used	Purpose of the stage
1. Quantitative study of the impact of income tax competitiveness on population migration processes				
1.1	Cluster analysis	Hierarchical analysis (dendrogram)	Standardized data: 1. Cost of outbound passenger transportation, million US dollars 2. Number of outbound trips for people who stayed overnight, thousands of trips 3. International Tax Competitiveness Index 4. Individual income tax rating 5. Income tax complexity rating 6. Capital gains/dividend tax rating	Determining the required number of groups (clusters) for subsequent division of the population using the more accurate k-means method
1.2	Cluster analysis	k-means method		Classification of countries in order to identify qualitatively homogeneous groups, due to the need to determine the number of clusters in advance, is carried out in stage 1.1
1.3	Statistical grouping	Typological grouping (country types are formed similarly to the groups in stage 1.2)	Data in natural units (indicators from stage 1.1 and 1.2)	To form qualitative conclusions, the data was grouped and the average characteristics were calculated in natural units, as the cluster analysis was performed on standardized data (stage 1.2).

End of Table 1

Stage	Characteristics of the stage research			
	Tool used	Method of analysis	Nature of the data used	Purpose of the stage
2. Theoretical analysis of the taxation conditions for individuals in countries that compete with the Russian Federation for labor resources				
2.1	Statistical grouping	Interval grouping	Data in natural units: the number of Russian citizens who traveled abroad for all purposes of the visit. The number of intervals (groups of countries) is defined as the root of their number, and the interval step is defined as the difference between the maximum and minimum values divided by the number of intervals	Selection of countries for characterizing the taxation conditions of individuals
Source: own compilation.				

In the context of taxation, the term "competitiveness" is used either in the context of territorial competition (Gromov, 2020), competition between tax systems (Pugachev et al., 2019), or international tax competition (Polezharova, 2025). The competitiveness of a tax is a property of a specific fiscal payment that is determined by its ability to minimize the negative impact on the economic activity of entities while maintaining stable and predictable revenues for the budget. Unlike the broader concept of "tax system competitiveness", which evaluates the overall effectiveness of a country's taxation model, tax competition focuses on individual taxes. The key difference lies in the scope of analysis: tax system competitiveness assesses the overall attractiveness of a country for investors, while tax competition focuses on how individual taxes influence business decisions, such as job location or income generation.

When selecting countries for the analysis of the conditions for calculating income taxes, scientists are guided by various categories, such as the estimated volume of GDP (Boldenkov et al., 2025), the experience of applying a progressive scale (Dyatlov, 2024). In our opinion, this approach does not comply with the principle of comparability and can significantly distort the results obtained. In this regard, for the selection of countries, we used the unified migration statistics for 38 OECD countries, formed in 2024 and formed by UN Tourism, a specialized agency of the United Nations[1].

Despite the fact that the UN positions its statistics as tourism statistics, they can be used to characterize migration flows for a number of reasons related to the methodology of accounting for indicators, economic factors, and social dynamics. The key criterion for distinguishing between tourism and migration in UN Tourism is the time factor. According to the recommendations of UN Tourism[2], a tourist is a person who travels to a place outside their usual environment for a period of one day to one year (for any purpose other than work)[3]. If a person stays in another country for longer than this period, they formally cease to be considered a tourist and pass into the category of a migrant (or resident). However, in practice, this boundary is blurred: many people who arrive as tourists extend their stay, change their visa status, or simply do not return. As a result, data on tourist flows are overestimated, and migration statistics are underestimated. UN Tourism statistics also take into account seasonal and cyclical migrations, which are often disguised as tourism (for example, in countries with a developed resort sector). Such people are

[1] Available at: https://www.untourism.int/tourism-statistics/tourism-statistics-database (accessed: 22.01.2026).
[2] International Recommendations for Tourism Statistics 2008.
[3] Available at: https://www.untourism.int/glossary-tourism-terms#T (accessed: 23.06.2026).

recorded as tourists if their stay does not exceed a year, although this is essentially economic migration. Their movements form a stable demographic and labor pattern characteristic of migration processes. Moreover, tourism is often the first stage of migration selection. Many potential migrants first visit a country as tourists to assess living conditions, property prices, educational quality, or employment opportunities. Therefore, a surge in tourism activity from certain regions often precedes an increase in migration flows from the same regions. Additionally, in a globalized and digitalized world, the boundaries between "temporary" and "permanent" residence are blurring. Digital nomads who live in different countries for 6–11 months are formally classified as tourists in hotel and airport statistics, but their lifestyle and economic impact are similar to those of migrants. Their presence is not accounted for in traditional migration statistics, as they do not change their citizenship or permanent registration, but they have a significant impact on the demographic and economic landscape of host countries. Finally, methodological differences in data collection also create overlaps. Tourism statistics are often based on border control data, bank transactions, and reservations. Migration statistics rely on registration data, population censuses, and visa applications. However, many migrants, particularly illegal or temporary workers, are not included in migration registers, and their movements are recorded by tourism databases. Thus, tourism statistics serve as an indirect indicator of the actual extent of population mobility, including unrecorded migration processes.

The significant indicators (within the framework of the cluster analysis) were the average cost of outbound passenger transportation and the number of outbound trips for people staying overnight. The following variables turned out to be statistically insignificant: the outgoing balance of payments for passenger transportation, the capacity of hotels and similar institutions.

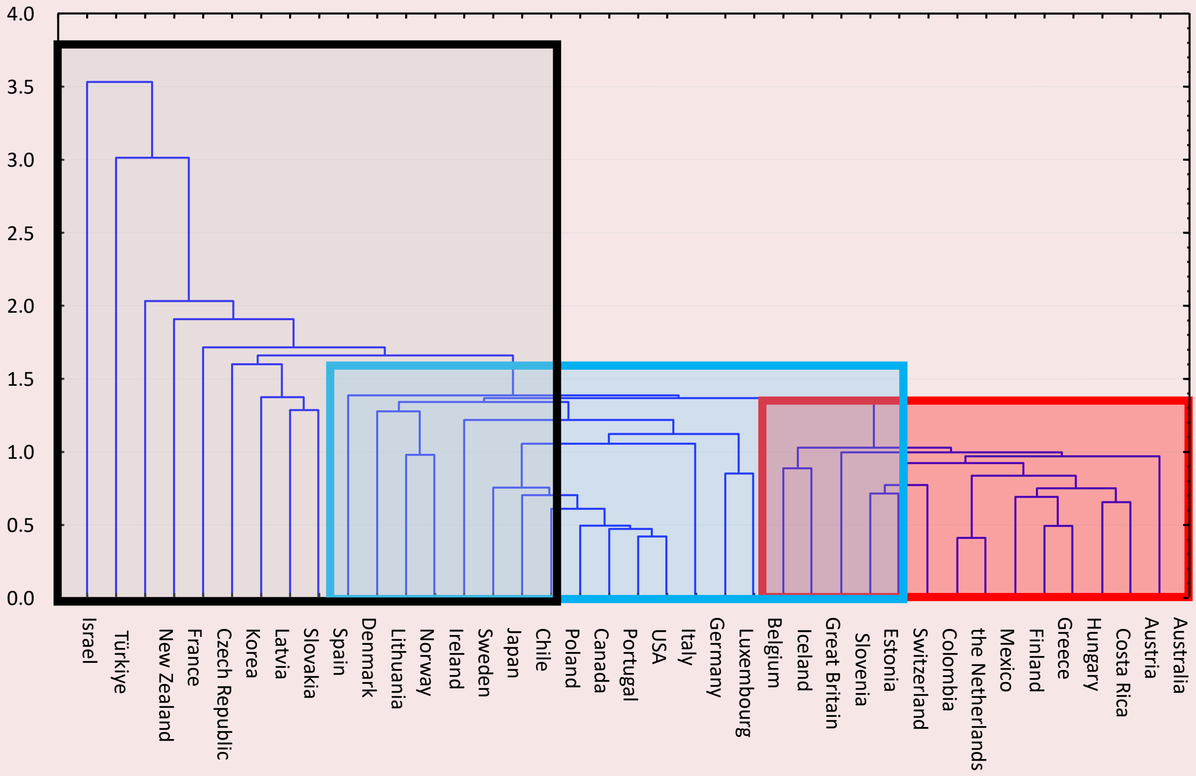
The assessment of the competitiveness of income taxation was carried out on the basis of the International Tax Competitiveness Index (ITCI). This index includes a country's ranking on individual income tax, which is determined by three subcategories: the rate and progressivity of wage taxation, the complexity of income tax, and the taxation of capital gains/dividends[4]. The choice of components is based on the fact that in most countries, individuals are taxed on income in two ways. First, countries tax income from employment through the regular income tax. Its structure can influence individuals' decisions about whether to work, take on additional part-time jobs, or whether the second parent in the family will work. Second, individuals are taxed on their savings through capital gains and dividend taxes. In most cases, these taxes can influence individuals' decisions about how much to save and invest. High taxes on capital gains and dividends can lead to a decrease in overall savings and investment in a country.

The methodological basis of the first stage was cluster analysis, implemented in the Statistica package, which allowed the OECD member countries to be grouped according to migration and tax competitiveness indicators. Since iterative cluster analysis (using the k-means method) improves the partitioning but requires the number of clusters to be known in advance, a hierarchical cluster analysis was performed first. The results of the latter are used exclusively to identify the number of groups, as the nature of the partitioning itself (often unbalanced) is heavily influenced by the chosen distance metric in this approach. Thus, in step 1.1, the number of clusters is determined as 3 (*Fig. 1*).

Subsequently, using the k-means method, the actual division of countries into three clusters was obtained (step 1.2), and the indicators under

[4] Available at: https://taxfoundation.org/research/all/global/2025-international-tax-competitiveness-index/ (accessed: 22.01.2026).

Figure 1. Classification tree of countries using hierarchical cluster analysis



According to: Tourism Statistics Database. Available at: https://www.untourism.int/tourism-statistics/tourism-statistics-database (accessed: 22.01.2026).

consideration were identified and characterized for each cluster (step 1.3).

The second stage involved a theoretical analysis of the taxation conditions of the main countries competing with the Russian Federation for labor resources. In the theoretical literature on tax competition, the optimal choice of tax rate for a mobile tax base is often characterized by a best response function that determines the optimal tax rate for a jurisdiction, taking into account the choices of other jurisdictions. This situation is typically referred to as a Nash equilibrium, a concept that describes a situation where no player can improve their position by changing their strategy alone, provided that the other players maintain their current actions. In this state, each player's strategy is an optimal response to the strategies chosen by other players, and the combination of these responses forms a system of mutually consistent decisions (Buettner, Poehnlein, 2024). Since the choice of tax rate by an individual government has a "fiscal" impact on other jurisdictions, it is intuitive that a Nash equilibrium is inefficient. In the case of tax competition, under certain assumptions, tax rates are a strategically important element of taxation (Zodrow, Mieszkowski, 1986). That is why the theoretical and legal analysis of the practice of taxation of individual income in our article is largely based on the study of the conditions for applying tax rates depending on the taxpayer's tax status.

To select countries for the analysis of foreign taxation experience, an interval analytical grouping was carried out on the departure of Russian citizens abroad for all purposes of the visit[5] (stage 2.1).

[5] The authors deliberately do not single out the purpose of the visit as "work", as many individuals do not indicate the true purpose of the move when leaving the territory of the Russian Federation.

The analysis of foreign experience was carried out on those countries that were included in the first and third groups in each year. The grouping allowed identifying seven countries that are priority destinations for work in 2022–2025: Türkiye, the UAE, Kazakhstan, Uzbekistan, Egypt, Armenia, and Georgia (*Tab. 2*). The number of citizens who have traveled to these countries is constantly increasing.

On the other hand, the possibility of migration can be a source of openness of the labor market within the framework of integration associations. It is no coincidence that some works consider the experience of "allied" states (Aliev, 2024). Since the EAEU has an open labor market and the countries that are part of the union can act as competitors for labor resources, using, among other things, tax conditions, two more EAEU members that were not included in the sample were added to the number of analyzed states: the Republic of Belarus (hereinafter – Belarus) and the Kyrgyz Republic (hereinafter – Kyrgyzstan).

Results

Quantitative study of the impact of income tax competitiveness on migration processes

To identify the impact of citizens' income taxation conditions on migration processes, a k-means cluster analysis was performed, which resulted in 38 countries being divided into three groups after two iterations based on six indicators (*Tab. 3*).

All classifiers were significant at the 5% level. As a result, three clusters of countries were formed (*Tab. 4*).

The first cluster includes economically developed countries with high levels of taxation. These countries have a balanced tax system, maintaining relatively high income tax rates (20–35% on average for the main income group) while providing extensive social security, well-developed infrastructure, and stable living conditions. Countries such as Germany, France, Norway, and Canada combine efficient tax systems with openness to migration.

Table 2. Results of cross-sectional interval grouping of countries by the number of departures (first three groups), 2022–2025

Interval group *	Year			
	2022	2023	2024	2025
Composition of country groups				
First	Türkiye, Kazakhstan, UAE	Türkiye, Kazakhstan	Türkiye, Kazakhstan	Türkiye, Kazakhstan
Second	Egypt, Georgia Finland, Armenia, Estonia	UAE, Egypt, Georgia Armenia, Thailand, China, Finland, Estonia	UAE, China, Egypt, Georgia, Thailand	China, UAE, Egypt, Georgia
Third	Ukraine Kyrgyzstan	Azerbaijan, Uzbekistan, Kyrgyzstan, South Ossetia, Tajikistan, Lithuania, Mongolia	Armenia, Azerbaijan, Uzbekistan, Estonia	Thailand, Armenia, Uzbekistan, Azerbaijan
Number of people leaving by country group, in thousands				
First	8728	8557	9081	9598
Second	4215	8436	8042	8351
Third	918	2632	2793	3721
Total left	13861	13625	19916	21670

* In order of decreasing number of departures.
Source: EMISS. Departure of Russian citizens. Available at: https://www.fedstat.ru/indicator/38480 (accessed: 15.01.2026).

Table 3. Significance of model parameters for clustering 38 OECD countries using the k-means method

Indicator	Analysis of Variance (Spreadsheet5)					
	Between SS	df	Within SS	Df	F-test	signif. p
1. Cost of outbound passenger transportation, million U.S. dollars (nominal values)	7.48	2	29.52	35	5.41	0.05
2. Number of overnight stays for people who stayed overnight, in thousands	8.49	2	28.51	35	6.05	0.04
3. International tax competitiveness index	27.61	2	9.39	35	51.44	0.00
4. Individual income tax rating	14.74	2	22.26	35	11.59	0.00
5. Income tax difficulty rating	31.88	2	5.12	35	108.86	0.00
6. Capital gains/dividend taxation rating	25.12	2	11.88	35	37.02	0.00
According to: Tourism Statistics Database (indicators 1 and 2). Available at: https://www.untourism.int/tourism-statistics/tourism-statistics-database; International Tax Competitiveness Index 2025 (indicators 3–6). Available at: https://taxfoundation.org/research/all/global/2025-international-tax-competitiveness-index/ (accessed: 22.01.2026).						

Table 4. Composition of the formed clusters of 38 OECD countries based on migration indicators and the competitiveness of income taxation

Cluster	Number of countries	Cluster composition
First cluster	18	Australia, Austria, Belgium, Canada, Chile, Finland, France, Italy, Norway, Portugal, Spain, Sweden, United Kingdom, Israel, United States, Netherlands, Denmark, Germany
Second cluster	8	Japan, Poland, Korea, Luxembourg, Costa Rica, Mexico, Ireland, Iceland
Third cluster	12	Czech Republic, Hungary, Latvia, Lithuania, Slovakia, Slovenia, Estonia, New Zealand, Switzerland, Türkiye, Greece, Colombia
According to: Tourism Statistics Database (indicators 1 and 2 of Table 3). Available at: https://www.untourism.int/tourism-statistics/tourism-statistics-database; International Tax Competitiveness Index 2025 (indicators 3–6 of Table 3). Available at: https://taxfoundation.org/research/all/global/2025-international-tax-competitiveness-index/ (accessed: 22.01.2026).		

The second cluster is formed by economies with a moderate level of tax burden and sustainable mechanisms for attracting foreign capital and labor. This cluster is dominated by countries with liberal tax policies. Ireland and Luxembourg stand out, with low personal income tax rates that attract labor and expats. Japan and South Korea, despite their stricter regulations, actively promote programs to attract skilled workers from outside the country. Poland, Mexico, and Costa Rica are examples of countries that use favorable taxation as part of their strategy to enhance competitiveness in the regional context.

The third cluster is represented by countries with diverse approaches to taxation and migration policies. These countries have a wide range of tax rates, from high tax burdens in Greece and Türkiye to relatively low rates in the Czech Republic, Estonia, and Slovakia. Despite these differences, all of these countries are interested in modernizing their tax regimes and implementing measures to attract highly skilled workers and temporary migrants. The countries of Central and Eastern Europe are actively developing as alternative centers of attraction for European specialists, while New Zealand and Switzerland remain attractive for long-term migration due to their flexible immigration programs and high quality of life. In general, given the current political situation, the countries of the third cluster can be characterized by a high level of attractiveness for international migrants and a moderately low tax burden on personal income. A map (*Fig. 2*) is provided to visualize the results of the cluster analysis.

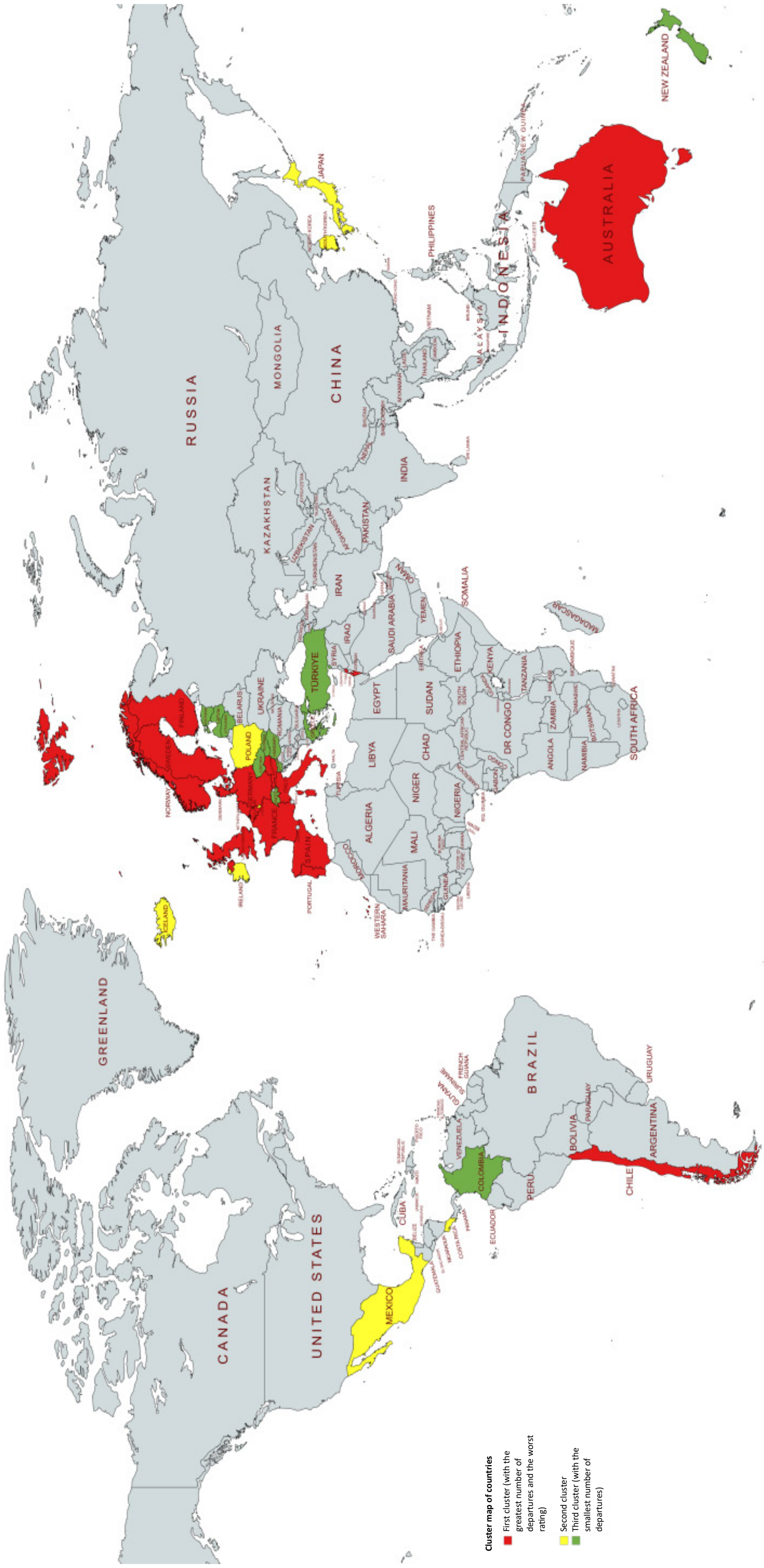


Figure 2. Cluster map of countries using the k-means method

According to: Tourism Statistics Database. Available at: https://www.untourism.int/tourism-statistics/tourism-statistics-database (accessed: 22.01.2026).

The relationship between tax and migration indicators was assessed using an analytical grouping of countries, where the composition of the groups is identical to the three clusters formed. Since all the indicators of the cluster analysis were significant for dividing the countries into groups, no further verification of the determination coefficient and the empirical correlation ratio was performed. *Table 5* presents the results of the grouping.

The increase in the number of citizens' departures (from 6,483 departures in the third cluster to 35,535 departures in the first cluster) stands out against the backdrop of a decrease in international tax competitiveness indicators (87 in the third cluster and 59 in the first cluster), as well as a decline in individual income tax assessments (73 in the third cluster and 52 in the first cluster) and capital gains and dividend tax assessments (82 in the third cluster and 48 in the first cluster). The methodology for constructing ratings is such that the more favorable the taxation system, the lower the tax burden, the higher the final rating of the country. Taken together, the results of the analytical grouping indicate that a high tax burden, especially on personal and investment income, becomes one of the significant incentives for emigration.

The direct relationship between migration flows and the complexity of the income tax system has not been confirmed. This means that the complexity of administrative procedures, the multi-level and complex scale of rates, and the need to apply various benefits do not have a clear effect on citizens' decisions to leave the country. Migration is determined by a combination of factors, including the quality of life, access to healthcare and educational infrastructure, security, unemployment rates, and, most importantly, the actual tax burden. Therefore, while the complexity of tax laws may influence individual behavior, it is not a key driver of migration. The main issue is not the form of the tax, but its size and distribution by type and group of income. It is no coincidence that countries with the highest outflow of population have the lowest income tax ratings. This is due, in particular, to the prevalence of progressive tax systems, where high rates apply even at relatively moderate incomes.

High income tax rates increase labor costs, which can lead to reduced effective working hours and lower production activity. The economy loses flexibility, and entrepreneurs and workers may seek more favorable employment conditions abroad, especially with the widespread adoption of remote work. As a result, countries with high personal income tax rates tend to receive lower scores in tax competitiveness indices compared to those with lower rates. It is especially important to determine the income level at which a progressive tax rate begins to apply: if it is achieved at relatively low income levels, the system is perceived as less attractive for mobile professionals and investors.

Table 5. Results of analytical grouping of 38 OECD countries based on migration indicators and the competitiveness of income taxation

Cluster	Average cost of outbound passenger transportation, million U.S. dollars	Number of overnight stays for people who stayed overnight, in thousands	International tax competitiveness index	Individual income tax rating	Income tax difficulty rating	Capital gains/ dividend taxation rating
First	48,970	35,535	59	52	97	48
Second	12,667	20,069	55	57	59	65
Third	6,380	6,843	87	73	99	82
Source: own compilation.						

In general, the first stage of the analysis confirmed the existence of a relationship between migration processes and the competitiveness of individual income taxation, which justifies further theoretical analysis of the taxation systems of countries that are potential competitors of the Russian Federation for labor resources.

Theoretical analysis of the taxation conditions for individuals in countries that compete with the Russian Federation for labor resources

To test the hypothesis about the relationship between the tax conditions in these countries and their attractiveness as destinations for Russian citizens' labor migration, we will analyze the income taxation of individuals in two ways: 1) residency criteria; 2) income tax rates for residents and non-residents.

Focusing on the first direction, we note that in all the countries included in the sample, as well as in Russia, the main criterion for determining residency is a period of stay in the country exceeding 183 days (6 months) within a 12-month period. The approaches to defining this period may vary (in some jurisdictions, it is the current calendar year, while in others, it is any 12 consecutive months). The criterion of an individual's stay in a state for the purpose of determining residency is based on the OECD Model Convention on Income and Capital Taxes, so it is logical for countries to use it in their national legislation. However, in many of the countries under consideration, this criterion is supplemented by other criteria (staying in the country for 90 days or more, having a place of permanent residence), which are usually accompanied by additional conditions for their application (special procedures for obtaining status, citizenship, employment, etc.). Consequently, in some countries, an individual can obtain residency status before the 183-day period expires, provided that they meet the additional conditions. *Table 6* presents additional criteria for classifying individuals as residents (Uzbekistan, where the 183-day criterion is the only one, is not included in the table).

Table 6. Additional criteria for determining residency in the countries in question

Country	Additional criteria for determining residency
Türkiye	A resident is a person who has a place of residence (ikametgüh) in Türkiye. The following persons are not recognized as residents (even if they have been in Türkiye for more than 6 months): – businesspeople, scientists, experts, government officials, journalists and radio journalists and others with similar conditions of activity, as well as those who come to Türkiye for the purpose of education, medical treatment, recreation or travel; – those who were detained or were in Türkiye for reasons beyond their control, such as detention, criminal record or illness[1].
UAE	A resident is an individual: 1) staying in the country for 90 days or more during 12 consecutive months, provided that the person is a citizen of the UAE (has a valid UAE residence visa) or a member country of the Gulf Cooperation Council, and at least one of the two additional conditions is met:1) having a permanent place of residence in the UAE; 2) conducting employment (valid employment contract) or business in the UAE; 2) having a primary place of residence and a center of financial and personal interests in the UAE[2]).
Kazakhstan	An individual is recognized as a resident in the following cases: 1) stay in the Republic of Kazakhstan for at least 90 calendar days (including arrival and departure days) for an investment resident of the Astana International Financial Center; 2) the existence of a center of vital interests in the country. The Center of Vital Interests is located in the Republic of Kazakhstan, subject to the following conditions: 1) an individual has citizenship or a residence permit or a residence permit; 2) the spouse and/or close relatives of an individual reside in the country; 3) the presence in the country of immovable property owned by right of ownership or on other grounds by an individual and (or) a spouse and (or) his (her) close relatives, accessible at any time for their residence[3]).

End of Table 6

Country	Additional criteria for determining residency
Egypt	An individual is recognized as a resident in the event of a permanent place of residence in Egypt or in the event of citizenship and receipt of income from the treasury of the state (civil servants). Permanent residence: when an individual is in the country for more than six months in housing that they own (rent or use on another legal basis) or when they own a business object (office, shop, etc.)[4]).
Armenia	Residents are considered to be: 1) individuals whose center of vital interests is located in the country (home or other place of residence, family, main place of professional or other activity); 2) individuals who are temporarily working outside the country and are in the public service[5]).
Georgia	There are special mechanisms for granting resident status: 1) for wealthy individuals (High Net Worth Individual, in accordance with Georgian securities market legislation). The procedure and conditions for recognition are established by the Ministry of Finance and the Ministry of Justice of Georgia; 2) for individuals whose residency cannot be established in relation to any country. Resident status can be granted upon the individual's application, following the procedure established by the Ministry of Finance of Georgia[6]).

[1]) Articles 3–5 of Law 193 on Income Tax in Türkiye. Available at: https://www.lexpera.com.tr/resmi-gazete/metin/gelir-vergisi-kanunu-10700-193 (accessed: 10.01.2026).
[2]) Ministerial Decision No. 27 of 2023 on Implementation of Certain Provisions of Cabinet Decision No. 85 of 2022 on Determination of Tax Residency. Available at: https://tax.gov.ae/DataFolder/Files/Legislation/Corporate%20Tax/Ministerial%20Decision%20No.%2027%20of%202023%20-%20For%20publishing.pdf (accessed: 10.01.2026).
[3]) Article 222 of the Tax Code of the Republic of Kazakhstan 214 VIII, dated 18.07.2025. Available at: https://adilet.zan.kz/rus/docs/K2500000214#z11007 (accessed: 10.01.2026).
[4]) Income Tax Law (promulgated by Law No. 91 of 2005), Egypt. Available at: https://www.wipo.int/wipolex/en/legislation/details/19870 (accessed: 10.01.2026).
[5]) Article 25 of the Tax Code of the Republic of Armenia. Available at: https://www.arlis.am/hy/acts/216365 (accessed: 10.01.2026).
[6]) Article 34 of the Tax Code of Georgia. Available at: https://matsne.gov.ge/en/document/view/1043717?publication=145 (accessed: 10.01.2026).
Source: own compilation.

The resident status in all countries affects the amount of tax liability (residents pay tax on all income received both from sources in the country and abroad; non-residents pay tax only on income received in the source country). It is worth noting that all countries follow the approach that active income is subject to income taxation, which includes total payments to an employee related to their employment (direct wages, contract/agreement payments, bonuses, premiums, and other similar payments) both in cash and in kind. The tax is mostly withheld by the tax agent (employer), but in some cases, a tax return may be required. In almost all countries where personal income tax is imposed (which is not the case in the UAE), the rates applied to the taxation of labor income for residents and non-residents are identical. The only exception is Egypt, where a single tax rate (10%) is applied to the income of non-residents, along with a progressive rate for residents at the main employer. This is a competitive advantage of foreign jurisdictions, as the main personal income tax rate for non-residents in Russia is quite high at 30%. The differences are most often found in the order of the tax base formation – the application of tax deductions is not available for non-residents. *Table 7* presents the rates applied in the taxation of labor income of individuals by country. For ease of perception, all scales are recalculated into rubles at the exchange rate of national currencies to the ruble on December 31, 2025.

Uzbekistan, Georgia, Armenia, and Kyrgyzstan have flat income tax rates for individuals, and Kyrgyzstan and Georgia offer reduced rates for those employed in priority sectors. The remaining

Table 7. Rates for income in the form of salaries and contract fees

Country	Rates
Türkiye	Progressive rates are applied: – up to 346,560 rubles – 15%; – 346,560 – 729,600 rubles – 51,984 rubles + 20% of the excess; – 729,600 – 2,736,000 rubles – 128,592 rubles + 27% of the excess; – 2,736,000 – 9,667,200 rubles – 670,320 rubles + 35% of the excess; – over 9,667,200 rubles – 3,096,240 rubles + 40% of the excess[1)]. No tax is deducted from income up to 7,759.9 rubles per month (the minimum gross salary minus the insurance premium). If the salary exceeds the non-taxable amount, the tax amount calculated from the non-taxable amount at the minimum rate[2)] is deducted from the tax.
UAE	There is no personal income tax.
Kazakhstan	The rate is progressive: – up to 5,698,187.5 rubles – the rate is 10%; – over 5,698,187.5 rubles – 569,818.75 rubles + 15% of the excess amount[3)]. The boundaries of the progression are tied to the MCI (monthly calculation index), which is set for each year[4)].
Egypt	Progressive tax rates: – for income up to 65,640 rubles – 0%; – over 65,640 to 90,255 rubles – 10%; – over 90,255 to 114,870 rubles – 15%; – over 114,870 to 328,200 rubles – 20% – over 328,200 to 656,400 rubles – 22.5%; – over 656,400 to 1,969,200 rubles – 25%; – over 1,969,200 rubles – 27.5%[5)]. Income received by an employee from a non-primary employer is taxed separately at a rate of 10%, without deductions or a 0% threshold. A similar approach applies to income earned by individuals who are not recognized as tax residents of Egypt.
Uzbekistan	The tax rate on “other” income, which includes income from employment, is 12%[6)].
Armenia	The rate is 20%[7)].
Georgia	The general rate of income in the form of wages is 20%, and a special reduced rate of 10% is applied to the earnings of certain specialists in the field of high technology and R&D[8)].
Belarus	Income in the form of wages is taxed at a rate of 13%. However, there are a number of special conditions: 1) the 25% rate is applied to incomes over 9,432,500 rubles[9)], but not more than 16,170,000 rubles; 2) the 26% rate is applied in some cases to incomes that are obtained as a result of illegal actions or in case of incorrect declaration of income (paragraph 7 of Article 214 of the Tax Code of the Republic of Belarus); 3) a 30% rate is applied to income exceeding 16,170,000 rubles. At special (increased) rates, the taxpayer pays tax according to the tax notification[10)].
Kyrgyzstan	The basic rate is 10%; for employers who are residents of the High-Tech Park or the Creative Industries Park, and for employers who have national, state, or investment significance, the reduced rate is 5%[11)]. There is a minimum calculated income rule: if an employee’s monthly salary is below the minimum calculated income, the base for calculating and withholding income tax is set equal to the minimum calculated income, and the employer pays the remaining amount of tax from their own funds[12)].

[1)] General Income Tax Communiqué 322. Available at: https://www.lexpera.com.tr/resmi-gazete/metin/gelir-vergisi-genel-tebligi-seri-no-332-33124-5 (accessed: 10.01.2026). At the Turkish lira exchange rate set by the Central Bank of the Russian Federation as of December 31, 2025, 10TRY = 18.24 rubles.

[2)] General Income Tax Communiqué 319. Available at: https://www.lexpera.com.tr/resmi-gazete/metin/gelir-vergisi-genel-tebligi-31732-seri-no-319 (accessed: 10.01.2026).

[3)] Article 363 (for residents) and Article 682 (for non-residents) NK RK 214 VIII, dated 18.07.2025. Available at: https://adilet.zan.kz/rus/docs/K2500000214#z11007 (accessed: 10.01.2026). According to the exchange rate of the Kazakh tenge set by the Central Bank of the Russian Federation as of December 31, 2025, 100 KZT = 15.5 rubles.

[4)] Law of the Republic of Kazakhstan, dated December 8, 2025, 239 VIII –On the Republican Budget for 2026–2028”. Available at: https://adilet.zan.kz/rus/docs/Z2500000239 (accessed: 10.01.2026).

End of Table 7

[5] Income Tax Law (promulgated by Law 91 of 2005), Egypt. Available at: https://www.wipo.int/wipolex/en/legislation/details/19870 (accessed: 10.01.2026); Law 7 "On Amendments to the Income Tax Law", 2024. Available at: https://www.eta.gov.eg/sites/default/files/2024-03/law_no.7-2024.pdf (accessed: 10.01.2026). According to the Egyptian pound exchange rate set by the Central Bank of the Russian Federation as of December 31, 2025, 10EGP = 16.41 rubles. [6] Article 381–382 of the Tax Code of the Republic of Uzbekistan. Available at: https://lex.uz/docs/4674902#4675685 (accessed: 10.01.2026). [7] Article 150 of the Tax Code of the Republic of Armenia. Available at: https://www.arlis.am/hy/acts/216365(accessed: 10.01.2026). [8] Article 81 of the Tax Code of Georgia. Available at: https://matsne.gov.ge/en/document/view/1043717?publication=145 (accessed: 10.01.2026). [9] According to the exchange rate of the Belarusian ruble set by the Central Bank of the Russian Federation as of December 31, 2025, 1BYN = 26.95 rubles. [10] Article 214 of the Tax Code of the Republic of Belarus. Available at: https://pravo.by/document/?guid=3871&p0=hk0900071 (accessed: 10.01.2026); Law of the Republic of Belarus 127-Z, dated December 30, 2025, "On Amendments to Laws on Tax Relations". Available at: https://enp.by/nalogovyj-kodeks/%D0%98%D0%B7%D0%BC%D0%B5%D0%BD%D0%B5%D0%BD%D0%B8%D1%8F%20%D0%B2%20%D0%9D%D0%B0%D0%BB%D0%BE%D0%B3%D0%BE%D0%B2%D1%8B%D0%B9%20%D0%BA%D0%BE%D0%B4%D0%B5%D0%BA%D1%81%202026.pdf?ysclid=mk5g6grgpm762776219 (accessed: 10.01.2026). [11] Article 197 of the Tax Code of the Kyrgyz Republic. Available at: https://www.alta.ru/tamdoc/22kg0003/ (accessed: 10.01.2026). [12] Article 200 of the Tax Code of the Kyrgyz Republic. Available at: https://www.alta.ru/tamdoc/22kg0003/ (accessed: 10.01.2026). Source: own compilation.

countries have progressive income tax rates, and Türkiye and Egypt have an exemption threshold (Egypt only for residents).

The conditions for labor income taxation can be also significantly influenced (if any) by agreements for the avoidance of double taxation treaty (DTT) concluded between countries. Russia has concluded the DTT with all the countries under consideration, with the exception of Georgia. It is worth noting that when applying the DTT with the UAE, Kazakhstan, Egypt, and Armenia, it is also necessary to take into account the provisions of the Multilateral Convention on Base Erosion and Profit Shifting (Clause 9 of Letter SHU-4-13/2691 dated March 9, 2023), as these countries (as well as Russia) have ratified it[6].

All agreements contain an article on the taxation of employment income, which has a similar structure. Almost all agreements[7] include a condition according to which, if an employee: 1) spends less than 183 days in the country during a 12-month period; 2) receives income from an employer who does not have a representative office in the country, and 3) the expenses do not reduce the tax base of the representative office in the country, then the tax on such payments to the employee is not withheld in the country, but is withheld in the employer's country. Special attention should also be paid to the definition of a 12-month period, as there are differences from one pair of countries to another in national legislation. There are also exceptional rules in the agreements, such as those often provided for crews of ships, rivers, and aircraft carrying out international transportation, as well as for civil servants.

In the scientific literature, the visa regime is highlighted as one of the most important aspects of migration related to taxation (Shrestha et al., 2026). Regarding the need for work permits and work visas (also an important factor in migration

[6] Signatories and parties to the multilateral convention to implement tax treaty related measures to prevent base erosion and profit shifting. Available at: https://www.oecd.org/content/dam/oecd/en/topics/policy-sub-issues/beps-mli/beps-mli-signatories-and-parties.pdf (accessed: 10.01.2026).

[7] The DTT with Belarus does not contain only one condition concerning 183 days.

related to taxation rules), it is important noted that for the EAEU member states (Armenia, Belarus, Kazakhstan, and Kyrgyzstan), there is a concept of a "common labor market" (Article 97 of the Treaty on the Eurasian Economic Union), so Russian citizens do not need special permits to work in these countries. Russia has a visa-free entry regime with these countries. However, this does not exempt Russian citizens from mandatory registration. In Armenia and Kyrgyzstan, registration with the relevant authorities is required after 30 days of stay, while in Belarus and Kazakhstan, it is required after 90 days[8]. *Table 8* presents the conditions for entry into other countries, as well as the necessary documentation for employment.

Table 8. Conditions of entry and employment by country

Country	Entering the country for tourism purposes[1)]	Entry into the country for work
Türkiye	Visa-free travel for up to 60 days	A "work visa" and a work permit from the Turkish Ministry of Labor are required[2)]: primary permit – up to 1 year, extensions: up to two years (first) and up to three years (subsequent)
UAE	The total permitted stay should not exceed 90 days during each 180-day period	A visa and a work permit issued by the employer are required[3)]; the period is up to two years with an extension
Georgia	Visa-free regime; the permitted period of stay in the country is up to 1 year, after which a Russian citizen must leave the country or obtain a temporary or permanent residence permit	A separate visa is not required, a temporary residence permit for work is issued for a period of 6 months to a year with the possibility of prolongation[4)]
Uzbekistan	Visa-free regime, but if you stay in the country for more than 15 days, you must register at your place of residence no later than the 15th day of one's stay.	A "confirmation of the right to work" is required; the term is 1 year, for highly qualified and qualified specialists – up to three years with an extension[5)]
Egypt	An entry visa is required, valid for 1 month and can be extended for an additional 2 months at the local migration authorities for free	A work permit is required, on the basis of which a visa is issued for a period of 1 year with an extension[6)]

[1)] Consular Information Portal. Country-specific data. Available at: https://www.kdmid.ru/docs/ (accessed: 25.01.2026).
[2)] Types of work permits. Available at: https://www.csgb.gov.tr/uigm/en/calisma-izni/calisma-izni-turleri/ (accessed: 25.01.2026).
[3)] Визы и Emirates ID. Available at: https://u.ae/en/information-and-services (accessed: 25.01.2026).
[4)] Law of Georgia on the Legal Status of Foreigners and Stateless Persons. Available at: https://www.matsne.gov.ge/en/document/view/2278806?publication=18&(accessed: 25.01.2026).
[5)] Obtaining confirmation of the right to work for foreign citizens in Uzbekistan. Available at: https://gov.uz/ru/advice/NaN/document/364 (accessed: 25.01.2026).
[6)] How to get a work permit in Egypt? Available at: https://www.mondaq.com/employee-rights-labour-relations/1247956/how-to-obtain-a-work-permit-in-egypt (accessed: 25.01.2026).
Source: own compilation.

[8] Consular information portal. Country data. Available at: https://www.kdmid.ru/docs/ (accessed: 25.01.2026).

Comparing the conditions of the visa regime, it is worth noting that the procedure for entry into Russia for the purpose of employment is comparable to the practice of the countries under consideration. An ordinary work visa is issued for the duration of an employment contract, but not more than one year, and a visa for highly qualified specialists is issued for up to three years with subsequent extension[9].

To summarize, we can note that the personal income tax rates for active income vary significantly by country (where it is present). For example, in Türkiye, Egypt, Armenia and Georgia (subject to the non-application of a preferential rate), the tax burden on this category of income will be higher than in Russia. In Kazakhstan, Uzbekistan, and Kyrgyzstan, it is lower; in Belarus, it is comparable (in terms of the base rate) with the tax burden in Russia. However, returning to the analysis of the number of citizens traveling abroad, we note that there is no obvious correlation between the most popular destination countries for leaving Russia and the personal income tax rates in these countries, so we can conclude that Russian personal income tax rates are competitive compared to other countries in terms of expected employment migration, which is influenced by other factors. In this context, it seems advisable to strengthen those aspects of tax regulation that contribute not only to the preservation, but also to attracting highly qualified labor to the country. In the competition for labor resources, it is necessary to use additional tools, among which the tax should be given a significant place.

From this point of view, the experience of Georgia and Kyrgyzstan is interesting, where reduced income tax rates are applied to the incomes of highly skilled specialists (HSS). This approach makes an additional contribution to attracting specialists to the country that the economy needs. In Russia, reduced personal income tax rates are also applied for the income of highly qualified specialists (paragraph 4, paragraph 3, art. 224 of the Tax Code of the Russian Federation), however, this reduces the tax burden only for non-residents and works more as a technical norm, allowing the tax to be calculated at general rates (progression of 13–22%) from the moment of entry into the country until obtaining resident status. Therefore, we believe that lower income tax rates can be applied as a tax measure to attract highly qualified specialists from areas where there is a shortage of personnel, regardless of their residence. For such specialists, it is possible to apply a truncated progression (13–15%), which will reduce their tax burden and increase the attractiveness of Russia as a place of residence and performance of work duties. The proposed measure is relevant due to the rather low threshold of progression (2.4 million rubles) with relatively high incomes of the category of highly qualified specialists[10].

It is important to note that today the reduced tax rate in Russia applies exclusively to the labor income of highly skilled specialists, however, other income, such as financial assistance, gifts, reimbursement of housing costs, etc., is subject to personal income tax at a rate of 30% if highly skilled specialists are not tax residents of the Russian Federation (Letters of the Ministry of Finance of Russia, dated August 5, 2014 No. 03-04-06/38542, dated June 30, 2014 No. 03-04-06/31385, dated June 21, 2013 No. 03-04-06/23539). This situation is very common when highly skilled specialists can reside in two countries, and if it is necessary to have a physical presence

[9] Federal Law 114-FZ, dated August 15, 1996 “On the Procedure for Leaving the Russian Federation and Entering the Russian Federation”.

[10] Available at: https://www.rbc.ru/economics/05/01/2025/676aafa49a7947ab96fbe7d9 (accessed: 31.01.2026).

in Russia, they are compensated for the associated costs by the employer. Taking into account the above, it seems advisable to apply a reduced personal income tax rate of 13 and 15% for any income of highly skilled specialists, including passive income (today, not all passive income of non-residents falls under this rate), regardless of its status. This will help attract capital from this category of employees to the Russian economy. To comply with the principle of tax equality, it is possible to establish a grace period for the application of reduced rates (up to three years), after which highly skilled specialists either switch to the terms of taxation of residents' income upon obtaining the status (applying the rate of 13–22% for labor income and 13 and 15% for other income), or their income not related to labor will be subject to the conditions applicable to non-residents.

In addition, today highly qualified specialists (as well as other categories of non-resident citizens, for whom the rate of 13–15% is applied) are deprived of the opportunity to receive tax deductions (Letter of the Ministry of Finance of Russia, dated June 15, 2018 No. 03-04-05/40970). It is advisable to grant the right to receive tax deductions for highly qualified specialists from the first day of their employment in the Russian Federation, this will allow for full consideration of the social factors affecting the migration of this category of citizens. For example, property tax deductions are a significant economic incentive to purchase real estate, which will allow "consolidating" the physical location of highly skilled specialists in Russia.

Discussion

First, in substantiating the relationship between income tax competitiveness and migration, we use aggregated data without taking into account the purpose of traveling abroad. It is worth noting that this approach is often used in scientific research (Huo et al., 2016), as it allows assessing the general trend. However, due to the lack of a breakdown by the purpose of departure, it is impossible to determine exactly which component of migration is due to the tax factor, which determines the prospects for further development of the proposed topic. Second, the analytical grouping based on data on tax competitiveness imposes restrictions on the interpretation of the results, since this method does not disclose which elements of the tax system – for example, rates, accrual thresholds, availability of benefits or the mechanism of tax administration – have the greatest impact on citizens' decisions to leave the country.

In the study, we did not take into account non-financial factors that can play a significant role in migration under the current conditions: political stability, the level of legal protection, the degree of corruption, the quality of public administration, access to education and healthcare, as well as cultural and linguistic proximity to a new country of residence (McKenzie, 2023). A special role among non-financial factors is played by trust in the state, the economy, and the business environment (Frolova, Tyurikov, 2024). At the same time, it is worth noting that the set of factors of labor migration differs for different countries (Odinaev, 2020), therefore, the study of the contribution of non-economic factors to the migration process of the Russian Federation requires independent research. Moreover, when analyzing the legislation of the participating countries, an attempt was made to reduce the impact of non-tax determinants of migration by including only states belonging to the EAEU Single Economic Zone in the sample. Participation in this agreement presupposes the harmonization of key norms in the field of trade, the free movement of goods, services and people, as well as the harmonization of some tax and regulatory practices. The EAEU forms a zone of liberal open trade, and numerous studies have shown that the country's integration into world trade changes the demand for labor in foreign markets and leads to increased migration flows (Autor et al., 2013; Lee, 2020). In such circumstances, political instability and gaps in the legal framework are much weaker, which makes it possible to more clearly identify the role of tax factors.

In general, our results correlate with the results of other scientists' research. We noted the high competitiveness of personal income tax, while highlighting the high tax rate for non-residents, proving the hypothesis put forward. However, this element negatively affects, first of all, the passive income of individuals from investments in Russian assets (for example, income from renting property) (Milogolov, 2017). Tax rates on labor income in many developed countries are significantly higher than in Russia for non-residents, which makes the tax burden for this category of taxpayers a less stressful factor.

The expediency of developing special taxation rules for highly qualified specialists corresponds to the results obtained earlier (Bierbrauer et al., 2013). (Morelli et al., 2012) proved that the least skilled workers prefer a unitary state to receive higher subsidies, while the most skilled workers prefer tax competition to reduce their tax payments. Research on best practices from abroad also corresponds to our ideas on additional income incentives for highly qualified foreign specialists (Aniskina, Starostin, 2014). The most radical studies have advanced further in this topic, justifying the expediency of canceling the increased personal income tax rate for non-residents. The stay of a specialist for the purpose of employment in Russia usually assumes a duration of more than a year. In such circumstances, the use of an increased personal income tax rate in the first months or at the end of the working period looks contradictory, as this creates a discriminatory effect (Milogolov, 2017).

Conclusion

Against the background of global comparisons, Russia demonstrates a stable position in the category of tax competitiveness in terms of taxation of individuals in a number of key indicators (including the basic income tax rate, the structure of progressive rates, as well as the presence or absence of additional taxes and fees). Thus, the introduced progressive personal income tax scale is unlikely to act as a real incentive to leave the country.

At the same time, given the shortage of specialists (especially highly skilled ones) in certain areas, it seems advisable to develop this area of taxation. To enhance Russia's attractiveness as a place for employment and permanent residence, it is necessary to focus on taxation of key groups of citizens whose activities directly affect the technological development, innovation potential and sustainable economic growth of the country. These groups primarily include highly qualified specialists. They are the basis for creating a new type of competitive economy. The modern taxation system in Russia, focused primarily on the mass consumer and standard incomes, is insufficiently adapted to the needs of this group. High income taxes, the lack of flexible tax incentives for foreigners, as well as difficulties in determining the status of a taxpayer create barriers to attracting highly skilled specialists.

To this end, the study suggests the temporary establishment of a two-stage personal income tax scale (13 and 15%) for any income of visiting highly skilled specialists and the application of tax deductions from the first day of income generation. This approach makes it possible to attract talent without violating the principles of tax equality for local citizens. It reduces the financial burden on specialists during the adaptation period, when moving, finding housing, and organizing everyday life require significant costs. At the same time, this creates a signal of the state's willingness to invest in human capital, which in the long term will generate new technologies, jobs and GDP growth.

The scientific novelty of the research consists in the development of our own two-stage methodology for analyzing the impact of personal income tax elements on migration flows, as well as in forming proposals for improving taxation of individuals in terms of adapting to the requirements of technological development of the taxation scale and approaches to applying tax deductions of highly qualified specialists, which ensures the attraction of the most valuable labor resources, as well as compliance with the principles of tax equality.

References

Aliev O.M. (2024). Progressive personal income tax scale as a reflection of fairness. *Vestnik Dagestanskogo gosudarstvennogo universiteta. Seriya 3: Obshchestvennye nauki*, 39(4), 39–56. DOI: 10.21779/2500-1930-2024-39-4-39-56 (in Russian).

Aniskina N.V., Starostin S.A. (2014). Taxation of non-resident individuals in the Russian Federation and the Federal Republic of Germany: Comparative legal analysis. *Voprosy sovremennoi yurisprudentsii*, 42, 70–76 (in Russian).

Autor D.H., Dorn D., Hanson G.H. (2013). The China syndrome: Local labor market effects of import competition in the United States. *Am. Econ. Rev.*, 103(6), 2121–2168. DOI: 10.1257/aer.103.6.2121

Balatsky E.V., Ekimova N.A. (2021). Fiscal and social effectiveness assessment of the personal income tax reform in Russia. *Journal of Applied Economic Research*, 20(2), 175–193. DOI: 10.15826/vestnik.2021.20.2.008 (in Russian).

Balatsky E.V., Ekimova N.A., Yurevich M.A. (2020). Macro assessment of the effect of the introduction of a progressive personal income tax scale. *Munitsipal'naya akademiya*, 3, 80–88 (in Russian).

Bezverbnyi V.A., Mikryukov N.Yu. (2019). The scale of emigration of highly qualified specialists from Russia: Statistical and sociological measurement. *Nauchnoe obozrenie. Seriya 1. Ekonomika i pravo*, 6, 19–31. DOI: 10.26653/2076-4650-2019-6-02 (in Russian).

Bierbrauer F., Brett C., Weymark J.A. (2013). Strategic nonlinear income tax competition with perfect labor mobility. *Games and Economic Behavior*, 82, 292–311. DOI: 10.1016/j.geb.2013.08.001

Boldenkov A.V., Lisutin O.A., Trusevich E.V., Romanyuk E.V. (2025). Progressive scale of personal income tax in Russia – realities and prospects. *Problemy sotsial'no-ekonomicheskogo razvitiya Sibiri=Issues of Social-Economic Development of Siberia*, 1(59), 9–16. DOI: 10.18324/2224-1833-2025-1-9-16 (in Russian).

Buettner T., Poehnlein M. (2024). Tax competition effects of a minimum tax rate: Empirical evidence from German municipalities. *Journal of Public Economics*, 236. DOI: 10.1016/j.jpubeco.2024.105148

Dyatlov O.I. (2024). Progressive personal income tax scale: Comparative legal approach (experience of the USA, Germany and China). *Vestnik prava=Bulletin of Law*, 1(5), 21–25 (in Russian).

Fomkin F.S. (2024). The problem of the "brain drain" from Russian science and the policy of overcoming it: Comparison with the experience of Israel and China. *Voprosy politologii=Political Science Issues*, 14, 11(111), 4115–4127. DOI: 10.35775/PSI.2024.111.11.036 (in Russian).

Frolova E.V., Tyurikov A.G. (2024). Mechanisms for forming trust in the economy: Specifics and assessment of the functional state. Narodonaselenie=Population, 27(2), 14–25. DOI: 10.24412/1561-7785-2024-2-14-25 (in Russian).

Gromov V.V. (2020). Regional tax competition at different phases of tax system evolution in Russia. *Finansovyi zhurnal=Financial Journal*, 12(1), 41–57. DOI: 10.31107/2075-1990-2020-1-41-57 (in Russian).

Hatfield J.W. (2015). Federalism, taxation, and economic growth. *Journal of Urban Economics*, 87, 114–125. DOI: 10.1016/j.jue.2015.01.003

Huo J., Wang X., Zhao N., Hao R. (2016). Statistical characteristics of dynamics for population migration driven by the economic interests. *Physica A: Statistical Mechanics and its Applications*, 451, 123–134. DOI: 10.1016/j.physa.2016.01.054

Lee E. (2020). Trade, inequality, and the endogenous sorting of heterogeneous workers. *J. Int. Econ.,* 125. DOI: 10.1016/j.jinteco.2020.103310

Lyssiotou P., Savva E. (2021). Labor supply responses to income tax free and bracket expansions. *Journal of Economic Studies*, 49(7), 1225–1239. DOI: 10.1108/JES-03-2021-0128

McKenzie D. (2023). Fears and tears: Should more people be moving within and from developing countries, and what stops this movement? *World Bank Res. Obs.*, 39(1), 75–96.

Milogolov N.S. (2017). An increased tax rate for non-residents in the context of tax competition. *Nalogoved*, 8, 56–61 (in Russian).

Morelli M., Yang H., Ye L. (2012). Competitive nonlinear taxation and constitutional choice. *Amer. Econ. J.*: Microecon., 4, 142–175.

Novikova T.S. (2024). To the question of the introduction of a progressive scale of personal income tax in Russia. *Vestnik Instituta ekonomiki Rossiiskoi akademii nauk*, 5, 58–86. DOI: 10.52180/2073-6487_2024_5_58_86 (in Russian).

Odinaev K.S. (2020). Research of socio-economic factors and causes of labor migration of the population of the Republic of Tajikistan. *Vestnik Tadzhikskogo gosudarstvennogo universiteta kommertsii*, 2(31), 125–131 (in Russian).

Panskov V.G. (2023). Changing priorities in the distribution of the tax burden as a condition for ensuring the transition to advanced development. *Ekonomika. Nalogi. Pravo=Economics, Taxes & Law*, 16(1), 140–151. DOI: 10.26794/1999-849X-2023-16-1-140-151 (in Russian).

Panskov V.G. (2025). Tax reform – 2025: To be continued. *Ekonomika. Nalogi. Pravo=Economics, Taxes & Law*, 18(1), 18–31. DOI: 10.26794/1999-849X-2025-18-1-18-31 (in Russian).

Pinskaya M.R., Tikhonova A.V. (2024). Methods of analysis the motives for legal tax behavior. *Finansy: teoriya i praktika=Finance: Theory and Practice*, 28(2), 60–70. DOI: 10.26794/2587-5671-2024-28-2-60-70 (in Russian).

Pinskaya M.R., Tikhonova A.V., Gerasimova A.E. (2025). Implementation of a laboratory experiment in a student environment to study the behavior of taxpayers in Russia. *Journal of Applied Economic Research*, 24(1), 91–124. DOI: 10.15826/vestnik.2025.24.1.004 (in Russian).

Polezharova L.V. (2025). On the issue of introducing a “minimum tax” in Russia in the context of international tax reform. *Ekonomika. Nalogi. Pravo=Economics, Taxes & Law*, 18(1), 138–146. DOI: 10.26794/1999-849X-2025-18-1-138-146 (in Russian).

Pugachev A.A., Parfyenova L.B., Podvezko A. (2019). Assessment of tax competition influence on national tax system competitiveness. *Ekonomika. Nalogi. Pravo=Economics, Taxes & Law*, 12(4), 143–155. DOI: 10.26794/1999-849X-2019-12-4-143-155 (in Russian).

Shrestha M., Kaila H., Cha’ngom N., Adhikari S. (2026). Do bilateral labor agreements increase migration? Global evidence from 1960 to 2020. *Journal of Development Economics*, 179. DOI: 10.1016/j.jdeveco.2025.103673

Smirnova E.E. (2024). Assessment of tax risks arising from personal income tax agents. *Finansy: teoriya i praktika=Finance: Theory and Practice*, 28(1), 64–74. DOI: 10.26794/2587-5671-2024-28-1-64-74 (in Russian).

Zodrow G.R., Mieszkowski P. (1986). Pigou, tiebout, property taxation, and the underprovision of local public goods. *J. Urban Econ.*, 19(3), 356–370.

Information about the Authors

Anna V. Tikhonova – Doctor of Sciences (Economics), Associate Professor, professor of department, Financial University under the Government of the Russian Federation (49, Leningradsky Avenue, Moscow, 125167, Russian Federation; e-mail: AVTihonova@fa.ru)

Yulia V. Malkova – Candidate of Sciences (Economics), Associate Professor, associate professor of department, Financial University under the Government of the Russian Federation (49, Leningradsky Avenue, Moscow, 125167, Russian Federation; e-mail: YuMalkova@fa.ru)

Received February 9, 2026.