The American Journal of Political Science Law and Criminology
ISSN 2693-0803 Volume 08 - 2026

Tax Sovereignty, International Tax Treaties, and Corporate Tax Avoidance: An Integrative Framework for Developing Economies

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Received: 20th Oct 2025 | Received Revised Version: 28th Oct 2025 | Accepted: 26th Nov 2025 | Published: 01st Jan 2026

Volume 08 Issue 01 2026 |

Abstract

This research article examines the complex interplay between tax sovereignty, international tax treaties, and corporate tax avoidance within developing economies. The regulatory and institutional dynamics of taxation in developing countries have significant implications for state capacity, fiscal equity, and sustainable development. Taxation has long been recognized as both a technical and political endeavor, shaping societal structures and the distribution of power. In contemporary discourse, this is compounded by the proliferation of international tax treaties and global pressures, such as those exerted by the OECD and G20, which aim to harmonize tax practices but may also curtail national sovereignty (Christians, 2010). Drawing on theoretical and empirical literature across taxation, state-building, and international political economy, this study synthesizes diverse perspectives to formulate an integrative framework that explicates how domestic and international tax regimes interact with corporate behavior, particularly tax avoidance strategies. The analysis situates tax treaties as instruments that can both enable and constrain domestic tax bases, and tax avoidance as a multidimensional phenomenon influenced by governance, firm characteristics, and global institutional pressures (Brooks & Krever, 2015; Dagan, 2000; Hearson, 2016). The study argues that understanding the implications of tax sovereignty and tax treaties on corporate tax avoidance requires nuanced attention to institutional capacity, political legitimacy, and the structural drivers of economic behavior. This article proposes avenues for policy reforms aimed at enhancing tax fairness and compliance, bolstering state revenue mobilization, and addressing inequalities amplified by international fiscal frameworks. The findings contribute to ongoing scholarly debates on taxation in development contexts and inform policymakers seeking equitable and effective tax governance.

Keywords: Tax Sovereignty, International Tax Treaties, Corporate Tax Avoidance, Developing Economies, Tax Compliance, Fiscal Capacity, Global Tax Governance.

Cite This Article: Santoso, A. (2026). Tax Sovereignty, International Tax Treaties, and Corporate Tax Avoidance: An Integrative Framework for Developing Economies. The American Journal of Political Science Law and Criminology, 8(01), 01–07. Retrieved from https://theamericanjournals.com/index.php/tajpslc/article/view/7201.

1. Introduction

Taxation is widely acknowledged as a foundational pillar of modern governance, not only as a mechanism for revenue mobilization but also as a means of structuring social relations and legitimizing state authority. The scholarly discourse on taxation intersects multiple domains—economics, law, political science, and development studies—reflecting its multidimensional impact on state capacity, social equity, and economic behavior. This article seeks to explore the intricate relationship between tax sovereignty, international tax treaties, and corporate tax avoidance with a focus on developing economies. The need for such examination arises from profound shifts in global tax governance, international investment flows, and corporate practices that challenge traditional conceptions of national fiscal autonomy.

Tax sovereignty refers to the inherent right of a state to establish and enforce tax laws within its jurisdiction. It is predicated on the principles of political authority and territorial integrity, wherein the state exercises legitimate control over fiscal policy (Brauner & Stewart, 2013). However, evolving economic integration and global governance initiatives have increasingly subjected national tax systems to external influences, particularly through international tax treaties and multilateral frameworks. Such treaties, designed ostensibly to prevent double taxation and stimulate cross-border investment, carry implications that extend beyond technical tax relief to influence domestic policy choices and revenue outcomes (Irish, 1974; Brooks & Krever, 2015).

International tax treaties, historically rooted in bilateral negotiations aimed at mitigating disputes over taxation rights between sovereign states, embody compromises that reflect both legal norms and power asymmetries. Early treaties prioritized avoidance of double taxation to facilitate trade and investment, especially among developed economies. However, as global capital mobility intensified in the late 20th and early 21st centuries, the normative basis and practical effects of these treaties came under scrutiny. Critics argue that treaties often contain provisions—such as reduced withholding tax rates and expansive definitions of tax residence—that can be exploited by multinational corporations to minimize tax liabilities, thereby eroding domestic tax bases in developing countries with limited negotiating leverage (Dagan, 2000; Hearson, 2016).

The phenomenon of corporate tax avoidance has emerged as a central concern within international tax policy debates. Distinguished from tax evasion, which comprises illegal acts, tax avoidance refers to the strategic use of legal means to reduce taxable income and liabilities. The line between avoidance and aggressive planning is often contested, involving complex legal interpretations and ethical assessments. Corporate tax avoidance has been linked to mechanisms such as transfer pricing manipulation, profit shifting to low-tax jurisdictions, and utilization of treaty benefits to circumvent domestic tax rules (Reineke & Weiskirchner-Merten, 2020). These strategies have profound implications for developing economies where corporate taxation constitutes a significant portion of public revenue and where institutional capacity to regulate sophisticated cross-border transactions may be limited.

The scholarly literature underscores the multifaceted drivers of tax avoidance, including firm-level characteristics such as profitability, ownership structure, and governance practices. Empirical evidence suggests that larger firms or those with complex organizational structures may have greater incentives and capabilities to engage in tax avoidance, facilitated by informational asymmetries and gaps in regulatory enforcement (Ouyang et al., 2020). Furthermore, concerns about fairness and compliance highlight normative dimensions that influence taxpayer behavior. Perceived inequities in the tax system, including how tax rules accommodate multinational enterprises compared to small and medium enterprises or individual taxpayers, can undermine voluntary compliance and trust in government (Oladipo et al., 2022).

The interplay between tax sovereignty and international tax frameworks is particularly salient in the context of emerging multilateral initiatives. Notable among these is the OECD/G20 Inclusive Framework on Base Erosion and Profit Shifting (BEPS), which seeks to modernize international tax rules and address aggressive tax avoidance through coordinated action. Advocates emphasize potential improvements in global tax fairness and cooperation, while critics caution against the potential dilution of national policy space and the risks of standardized approaches that may not reflect the developmental priorities of diverse economies (Christians, 2010; Motala, 2021). This tension between global coordination and sovereign discretion encapsulates broader questions about the role of states in an increasingly interconnected economic order.

In developing economies, the stakes of these dynamics are elevated. Tax revenue mobilization is essential for financing public goods and services, reducing dependence on volatile external financing, and promoting inclusive growth. Yet, many developing countries grapple with limited administrative capacity, high informality, and structural inequalities that constrain their ability to harness tax systems effectively (Brautigam et al., 2008; Fuest & Zodrow, 2013). The introduction of international tax treaties can offer technical frameworks for integration into the global economy but may also introduce complexities that disproportionately benefit multinational enterprises with sophisticated tax planning mechanisms.

The literature reveals divergent viewpoints on the net impact of international tax treaties on developing countries. Some researchers argue that treaties can enhance investment by reducing tax risks and clarifying fiscal obligations, contributing to predictable and stable investment climates. Others contend that the actual bargaining outcomes often favor capital-exporting countries and their multinational firms, resulting in treaty provisions that limit source-country taxation rights and erode the tax base (Hearson, 2016). This debate intersects broader concerns about equity, power, and the normative foundations of international economic law.

Despite extensive research on individual aspects of taxation and tax behavior, there exists a gap in integrative frameworks that systematically connect tax sovereignty, treaty dynamics, and the micro-level behaviors of corporate taxpayers within the specific institutional landscapes of developing economies. This article aims to address this gap by synthesizing theoretical insights and empirical findings to produce a comprehensive understanding of how international tax regimes interface with domestic fiscal governance and corporate conduct. By integrating perspectives from international law, political economy, and firm-level analyses, the study seeks to illuminate the mechanisms through which external tax agreements shape internal tax outcomes and to identify pathways for policy reforms that strengthen national tax sovereignty while promoting equitable and effective tax governance.

2. Methodology

This study employs a qualitative, interpretive research design grounded in extensive literature synthesis, comparative analysis, and conceptual modeling. The methodological approach is structured to integrate multiple layers of inquiry: the legal and institutional frameworks of taxation, the macro-level implications of international tax treaties, and the micro-level behaviors of corporate actors engaging in tax avoidance. The rationale for a qualitative approach is premised on the need to deeply understand complex institutional, normative, and behavioral phenomena that cannot be fully captured through quantitative metrics alone. Taxation, particularly in developing countries, operates at the intersection of law, politics, and economics, requiring nuanced theoretical and contextual analysis to identify causal mechanisms, constraints, and interactions (Brauner & Stewart, 2013; Fuest & Zodrow, 2013).

The research draws on three primary methodological components. First, an extensive review of legal and policy literature concerning tax sovereignty and international tax treaties forms the backbone of the study. Key sources include scholarly monographs, law journal articles, government publications, and institutional reports from entities such as the OECD, G20, and International Centre for Tax and Development. This component provides a historical and normative foundation, tracing the evolution of bilateral tax agreements, the rationale for treaty provisions, and the implications for state revenue and policy autonomy (Dagan, 2000; Brooks & Krever, 2015). Special attention is paid to debates surrounding treaty negotiation outcomes, the asymmetric bargaining power between developed and developing countries, and the role of multilateral initiatives such as the BEPS framework (Hearson, 2016; Motala, 2021).

Second, firm-level empirical studies are synthesized to capture patterns of corporate tax avoidance. This involves an analysis of peer-reviewed accounting and management research that investigates determinants of tax avoidance behavior, including firm size, profitability, ownership concentration, related-party transactions, and compliance culture (Oktaviani et al., 2023; Ouyang et al., 2020; Shabika et al., 2023). Particular emphasis is placed on studies from developing economies, such as Indonesia, Nigeria, and China, to elucidate context-specific dynamics. The synthesis includes discussion of methodological approaches employed in these studies, including regression analyses, surveys, and tax compliance audits, highlighting the interplay between structural incentives and regulatory constraints. The analysis further examines the ethical, perceptual, and reputational dimensions that influence corporate decision-making regarding tax avoidance (Pratama, 2017; Rudyanto & Pirzada, 2020).

Third, the study adopts a conceptual integrative approach to model the interaction between international tax regimes and domestic fiscal outcomes. This involves mapping theoretical constructs such as tax sovereignty, treaty obligations, administrative capacity, and corporate behavior into a coherent analytical framework. The approach draws on insights from political economy, institutional theory, and behavioral accounting to understand how formal rules and informal norms shape compliance outcomes and fiscal performance (Brautigam et al., 2008; Fuest & Zodrow, 2013). By situating firm-level strategies within macro-level institutional and legal contexts, the framework allows for a nuanced assessment of the conditions under which international tax treaties either enhance or undermine domestic tax bases.

In operationalizing this methodology, the study engages in comparative textual and thematic analysis. Treaty texts, legal commentaries, and case law are examined to identify recurring provisions and interpretive patterns relevant to tax avoidance opportunities and constraints. Tax policy documents from developing countries are analyzed to determine how international agreements influence domestic legislation, enforcement practices, and administrative priorities. Similarly, empirical studies of corporate tax behavior are coded thematically to identify patterns in determinants, strategies, and outcomes of tax avoidance. Through triangulation of these data sources, the study seeks to ensure analytical rigor and mitigate potential biases inherent in relying on a single source of evidence.

The study is bounded by several methodological limitations. First, the reliance on secondary sources constrains the ability to obtain real-time, firm-specific data on tax payments and avoidance strategies, which are often confidential and sensitive. While peer-reviewed studies provide robust insights, the heterogeneity of measurement approaches and definitions of tax avoidance may introduce variability in interpretation (Neuman et al., 2020; Reineke & Weiskirchner-Merten, 2020). Second, the interpretive nature of the analysis implies that findings are contingent upon the theoretical framing and literature selection. Efforts were made to ensure comprehensiveness by including sources spanning multiple jurisdictions, disciplines, and perspectives, but gaps in data coverage and regional specificity remain possible. Third, while the conceptual framework offers explanatory power, it is not empirically validated through primary data collection; rather, it is intended to provide a heuristic model for understanding complex interactions between tax treaties, corporate behavior, and state capacity.

Despite these limitations, the methodology provides significant analytical advantages. By integrating legal, institutional, and behavioral perspectives, the approach captures the multidimensional nature of taxation in developing economies. It allows for critical engagement with scholarly debates, identification of systemic patterns, and generation of policy-relevant insights that transcend the limitations of narrowly quantitative or single-country studies. Furthermore, the approach accommodates the dynamic and evolving nature of international tax governance, offering a framework capable of incorporating emerging initiatives, such as the global minimum tax and digital services taxation, and their implications for developing countries (Motala, 2021; Christians, 2010).

Finally, the methodological framework emphasizes transparency, reflexivity, and analytical rigor. Each stage of the analysis explicitly links evidence to claims, situates findings within existing theoretical discourse, and considers counter-arguments and alternative explanations. This enhances the credibility of conclusions and ensures that policy recommendations are grounded in a robust understanding of both the structural and agent-level determinants of tax outcomes. By combining historical analysis, empirical synthesis, and conceptual modeling, the methodology provides a comprehensive basis for interpreting the complex relationship between tax sovereignty, international tax treaties, and corporate tax avoidance.

3. Results

The analysis reveals multifaceted insights into how tax sovereignty and international tax treaties shape corporate tax avoidance behaviors and domestic fiscal outcomes in developing economies. First, examination of treaty provisions demonstrates that bilateral agreements often prioritize avoidance of double taxation and investor protection. Provisions such as reduced withholding tax rates, preferential treatment of dividends and royalties, and flexible definitions of permanent establishment create avenues that can be strategically exploited by multinational corporations (Irish, 1974; Brooks & Krever, 2015). Empirical studies highlight that firms with extensive cross-border operations systematically utilize these provisions to shift profits to lower-tax jurisdictions, thereby reducing overall tax liability while remaining technically compliant with the law (Reineke & Weiskirchner-Merten, 2020; Oktaviani et al., 2023).

Second, firm-level characteristics significantly influence tax avoidance strategies. Larger firms, particularly those with multiple large shareholders or multinational ownership structures, are more likely to engage in sophisticated tax planning practices (Ouyang et al., 2020). Evidence suggests that firms in the hospitality, tourism, and manufacturing sectors demonstrate differential avoidance behaviors, shaped by both profitability and regulatory exposure (Maulita & Nailufaroh, 2022; Oktaviani et al., 2023). Smaller or domestically oriented firms exhibit limited capacity to exploit treaty benefits, highlighting the intersection of firm size, resource endowment, and institutional navigation.

Third, perceptions of tax fairness and trust in government are critical determinants of voluntary compliance. Studies in Nigeria and Indonesia reveal that taxpayers' perceptions of equitable treatment, procedural transparency, and accountability significantly influence compliance behaviors (Oladipo et al., 2022; Pengaruh, 2020). Firms that perceive the tax system as biased or prone to preferential treatment for multinationals may engage in avoidance or aggressive planning as rational responses to structural inequities. These findings underscore the interplay between normative and instrumental motivations in shaping corporate behavior, reflecting a blend of ethical, strategic, and institutional considerations (Pratama, 2017; Rudyanto & Pirzada, 2020).

Fourth, multilateral initiatives, such as the OECD/G20 BEPS project and proposed global minimum tax, introduce both constraints and opportunities for developing economies. On one hand, such frameworks can standardize reporting requirements, enhance transparency, and reduce profit-shifting opportunities, potentially bolstering domestic revenue mobilization (Motala, 2021). On the other hand, these initiatives may constrain national policy space, limit discretion in designing tax incentives, and favor jurisdictions with greater administrative capacity, thereby perpetuating structural imbalances between developed and developing countries (Christians, 2010).

Finally, the cumulative evidence indicates that international tax treaties and corporate behavior are embedded within broader political and institutional contexts. Developing countries with limited administrative capacity, high informality, and constrained negotiation leverage face systemic risks of revenue erosion. Conversely, countries that invest in institutional strengthening, capacity building, and treaty renegotiation demonstrate enhanced ability to align international agreements with domestic fiscal objectives (Brautigam et al., 2008; Fuest & Zodrow, 2013). The results highlight the necessity of viewing tax outcomes through a lens that integrates legal, economic, and political dimensions, acknowledging the dynamic interplay between structure and agency in shaping both firm behavior and state revenue performance.

4. Discussion

The findings underscore the intricate nexus between tax sovereignty, international tax treaties, and corporate tax avoidance, revealing several theoretical, practical, and policy-relevant implications. Conceptually, the analysis affirms that taxation operates not merely as a fiscal instrument but as a political and social tool for shaping power relations, resource distribution, and institutional legitimacy. Tax sovereignty, while ostensibly a fundamental prerogative of the state, is continuously mediated by international norms, treaties, and investor pressures (Brauner & Stewart, 2013; Motala, 2021). The persistent tension between global coordination and domestic discretion exemplifies broader challenges in reconciling national autonomy with integrated economic governance frameworks.

From a legal perspective, international tax treaties occupy a dual role as both facilitators and constraints. On one hand, treaties reduce the risk of double taxation, enhance predictability, and attract foreign investment, theoretically contributing to economic development and fiscal stability (Irish, 1974). On the other hand, treaty provisions may be exploited for aggressive tax planning, particularly by multinational firms capable of navigating complex cross-border regulatory landscapes (Dagan, 2000; Reineke & Weiskirchner-Merten, 2020). This duality highlights the importance of evaluating treaties not solely on their technical design but also on their practical implementation and distributive consequences for domestic revenue collection.

Behavioral insights provide additional nuance to understanding corporate tax avoidance. Firms do not operate in a vacuum; their strategies are shaped by institutional incentives, perceived fairness, ethical considerations, and reputational concerns (Pratama, 2017; Rudyanto & Pirzada, 2020). The empirical evidence indicates that profit maximization motives intersect with normative factors, suggesting that policy interventions addressing tax avoidance must combine legal enforcement with initiatives to enhance trust, transparency, and compliance culture (Oladipo et al., 2022; Pengaruh, 2020).

Institutional and capacity-related factors emerge as critical determinants of the effectiveness of tax governance in developing economies. Countries with robust administrative systems, sophisticated auditing capacities, and clear legal frameworks are better positioned to mitigate the revenue erosive effects of profit shifting and treaty exploitation (Brautigam et al., 2008; Fuest & Zodrow, 2013). Conversely, jurisdictions with limited capacity face structural disadvantages that amplify the asymmetries embedded in international tax arrangements. The literature suggests that strategic investment in institutional strengthening, capacity building, and treaty renegotiation can enhance fiscal autonomy and reduce reliance on external prescriptions (Hearson, 2016).

The results also illuminate the broader normative and ethical dimensions of international taxation. While multinational firms benefit from global capital mobility and treaty protections, their actions often generate inequities in tax burdens, exacerbating disparities between capital-exporting and capital-importing countries (Brooks & Krever, 2015). Policy debates must therefore balance efficiency considerations with equity objectives, recognizing that unbridled tax avoidance undermines social legitimacy, public trust, and developmental outcomes. Integrative policy measures—encompassing transparency initiatives, anti-abuse rules, and progressive taxation frameworks—can mitigate these challenges while preserving incentives for legitimate investment (Fuest & Zodrow, 2013; Motala, 2021).

The study identifies significant gaps and opportunities for future research. First, empirical studies linking treaty design to firm-level tax outcomes remain sparse, particularly in developing country contexts. Longitudinal analyses tracking the effects of treaty renegotiations, BEPS implementation, and global minimum tax adoption on domestic revenue collection would provide valuable insights. Second, more research is needed on the ethical and perceptual dimensions of tax compliance, exploring how taxpayer trust, social norms, and corporate governance interact with legal and institutional incentives. Third, comparative studies across diverse developing economies can illuminate contextual factors that moderate the effectiveness of international tax arrangements, offering guidance for adaptive policy frameworks.

In sum, the discussion reinforces the notion that taxation in developing economies is inherently multidimensional, intersecting legal, economic, political, and behavioral domains. Effective tax governance requires an integrative understanding that reconciles international obligations with domestic imperatives, aligns firm behavior with societal expectations, and leverages institutional capacity to protect and enhance revenue mobilization. The insights gained from this analysis contribute to ongoing scholarly debates, inform evidence-based policymaking, and provide a foundation for future explorations of tax sovereignty, treaty dynamics, and corporate fiscal conduct.

5. Conclusion

This article has explored the intricate relationships between tax sovereignty, international tax treaties, and corporate tax avoidance in developing economies. By synthesizing theoretical insights and empirical evidence, the study demonstrates that taxation functions not only as a fiscal tool but also as a mechanism of governance, equity, and legitimacy. International tax treaties, while facilitating cross-border investment and reducing double taxation, present both opportunities and challenges for domestic revenue mobilization. Corporate tax avoidance, shaped by firm characteristics, institutional capacity, and perceptions of fairness, interacts dynamically with these treaty arrangements to influence fiscal outcomes.

The research highlights the importance of enhancing administrative capacity, strengthening legal frameworks, and fostering trust and transparency to mitigate the adverse effects of profit shifting and treaty exploitation. Policymakers in developing economies must navigate the dual imperatives of maintaining tax sovereignty and integrating into global tax governance structures, balancing efficiency and equity considerations. The conceptual framework developed in this study provides a foundation for understanding the multidimensional drivers of tax outcomes and informs strategies for equitable and effective tax administration. Future research should focus on longitudinal, comparative, and empirically grounded investigations to deepen understanding of how international and domestic tax dynamics interact to shape development trajectories.

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