Applying the Theory of Planned Behavior to SME Tax Compliance: A Conceptual Literature Review and Firm-Level Framework

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DOI: https://dx.doi.org/10.47772/IJRISS.2025.910000203

Received: 07 October 2025; Accepted: 14 October 2025; Published: 07 November 2025

ABSTRACT

This conceptual review examines the applicability of the Theory of Planned Behavior (TPB) in understanding tax compliance behavior among small and medium enterprises (SMEs). While TPB has been widely applied to individual behavior, its extension to firm-level analysis remains limited. The study synthesizes existing literature to propose a firm-level framework that operationalizes TPB's three constructs, namely attitude, subjective norms, and perceived behavioral control, within organizational and legal contexts. It integrates Malaysia's statutory framework and emphasizes that firms express behavioral intentions through legally authorized representatives such as directors and managers. The findings indicate that TPB provides a coherent and adaptable framework for analyzing SME tax compliance when its constructs are interpreted through managerial attitudes, stakeholder expectations, and perceived resource control. The review highlights theoretical, practical, and methodological contributions by demonstrating TPB's adaptability beyond individual agency and by offering policymakers insights into enhancing compliance through behavioral and institutional interventions. The study concludes by proposing directions for future empirical research to validate the conceptual framework of firm-level tax compliance behavior.

Keywords: Theory of Planned Behavior; Tax Compliance Behavior; Small and Medium Enterprises; Firm-Level Compliance; Malaysia.

INTRODUCTION

Taxation is a foundational mechanism through which governments mobilize revenue, finance public expenditure, and sustain economic development. An effective tax system ensures fiscal stability and enables the delivery of essential public goods while promoting equity and embedding social responsibility among economic actors. However, the effectiveness of any tax system depends not only on its legal and administrative design but also on taxpayer compliance behavior (OECD, 2021).

Tax behavior refers to how individuals or entities perceive, evaluate, and act upon their tax obligations. Traditional economic models, which view taxpayers as rational agents weighing compliance costs against detection risks, have been criticized for oversimplifying real-world dynamics (Allingham & Sandmo, 1972). In response, researchers increasingly adopt behavioral perspectives, emphasizing intrinsic motivations, social norms, and trust in authorities as explanations of compliance (Alm, 2019).

Small and medium enterprises (SMEs) are particularly important in this regard. SMEs typically operate with modest capital and limited resources yet contribute substantially to GDP and employment. In Malaysia, SMEs represent more than 97 percent of business establishments, underscoring their economic significance (SME Corporation Malaysia, 2023). Nevertheless, they face challenges in meeting tax obligations due to limited resources, complex regulations, and gaps in knowledge. These challenges raise the risk of both intentional and unintentional noncompliance. Importantly, such challenges are not unique to Malaysia but are shared by SMEs in many jurisdictions, making the Malaysian case illustrative of broader global issues.

The Theory of Planned Behavior (TPB), formulated by Ajzen (1991), offers a robust framework for examining compliance choices. TPB posits that behavioral intention, shaped by attitudes, subjective norms, and perceived behavioral control, is the immediate antecedent of behavior. While its predictive power at the individual level is well established (Ajzen, 2020), its application to organizations has received limited attention. Within SMEs, TPB has the potential to explain how managerial attitudes toward taxation, normative pressures from stakeholders, and perceptions of control over compliance resources collectively shape organizational intentions and compliance behavior.

Accordingly, this conceptual review proposes a framework for applying the Theory of Planned Behavior (TPB), originally designed for individuals, to the firm level for understanding SME tax compliance behavior. Establishing this applicability requires conceptual clarification of how firms legally express intentions and behaviors. Since organizations act through natural persons empowered by law, it is necessary to clarify who represents the firm for the purpose of operationalizing TPB constructs. While this introduction establishes the conceptual basis for applying TPB to SME compliance, the next section identifies the limitations of prior research and clarifies the theoretical gaps that must be addressed before TPB can be meaningfully applied at the firm level.

Problem Statement

Although the Theory of Planned Behavior (TPB) has been widely validated for predicting individual behavior, its application to organizations remains underdeveloped. The theory was originally conceptualized to explain individual agency, which raises the important question of whether its constructs of attitudes, subjective norms, and perceived behavioral control can also be meaningfully applied to collective entities such as firms. Small and medium enterprises (SMEs) provide a particularly relevant setting to explore this question. SMEs are vital contributors to economic growth and employment, yet they face distinct compliance challenges resulting from limited resources, regulatory burdens, and knowledge gaps.

Existing research provides some evidence that TPB may be applied to SMEs, but the findings are fragmented and inconsistent. Studies confirm the influence of attitudes and perceived behavioral control, yet results for subjective norms remain mixed and inconclusive. Many of these studies also rely on self-reported data from managers without linking responses to observable compliance outcomes, which limits their explanatory strength. Furthermore, applications of TPB to organizations are often geographically narrow and rarely tailored specifically to SMEs, leaving important contextual realities unaddressed.

To address these shortcomings, this study proposes a conceptual framework that applies TPB at the firm level by anchoring its constructs in the organizational and legal context of SMEs. Attitudes are interpreted as managerial and corporate values toward taxation, subjective norms as institutional and stakeholder expectations, and perceived behavioral control as the firm's ability to comply based on resources, systems, and clarity of regulations. By operationalizing these constructs through legally recognized representatives such as directors and managers, the study tests whether TPB, originally designed for individuals, can be validly applied to firms to analyze tax compliance behavior.

Given these conceptual gaps, it is important to clarify the legal dimension of organizational behavior. Since firms do not act on their own but through representatives empowered by law, the next section outlines the legal foundations that define how companies express intentions and fulfill compliance obligations in Malaysia.

Legal Foundations of Firm-Level Compliance

Applying the Theory of Planned Behavior (TPB) to firms requires recognizing the distinct legal character of organizations. Unlike individuals, companies are artificial legal persons that possess rights and obligations but cannot act independently. Their intentions and actions must be expressed through natural persons authorized by law. For SMEs this distinction is essential, because the TPB constructs of attitudes, subjective norms, and perceived behavioral control can only be understood through the behavior and decisions of those who legally represent the firm.

In Malaysia, the Companies Act 2016 establishes the framework for such representation. The Act defines a company as a body corporate with a separate legal personality (section 20) and places responsibility for managing its business and affairs on directors (section 211). Each company must also appoint at least one company secretary to oversee statutory filings and compliance (section 236). Authority may be delegated further to directors, employees, or other persons (section 210). Additional provisions, such as the Powers of Attorney Act 1949 and the Contracts Act 1950, extend representation to third parties, making principals legally bound by the acts of their authorized agents.

Tax law reinforces these principles. Under the Income Tax Act 1967, directors, managers, or principal officers are held responsible for a company's tax obligations (section 75). Similarly, the Sales Tax Act 2018 requires registered manufacturers to account for tax and furnish returns (sections 2, 3, and 33), while the Service Tax Act 2018 imposes equivalent obligations on registered taxable persons (sections 2, 11, and 13).

Taken together, these provisions clarify the natural persons through whom firms act in matters of compliance. For the purposes of TPB, this legal framework provides the operational bridge from individual constructs to organizational behavior. Directors, managers, and other authorized officers embody the firm's attitudes toward taxation, respond to normative pressures from regulators and stakeholders, and perceive the resources and regulatory clarity that define its ability to comply. This legal grounding sets the stage for the literature review, which examines how TPB has been applied across disciplines and explores its potential extension to SME tax compliance.

LITERATURE REVIEW

The Theory of Planned Behavior (TPB), developed by Icek Ajzen in 1985, is a psychological framework that predicts human behavior through three core constructs: attitudes, subjective norms, and perceived behavioral control (PBC), which collectively influence behavioral intentions (Bellová & Špírková, 2021). TPB has demonstrated broad applicability across diverse health and behavioral domains, including hypertension prevention (Sukohar & Suharmanto, 2021), personalized nutrition adoption (King et al., 2024), rheumatoid arthritis self-management (Al-Shamali et al., 2023), and green energy behavior (Kumar & Nayak, 2022). Meta-analyses reveal attitude as the strongest predictor of behavioral intention, followed by subjective norms and PBC (Kumar & Nayak, 2022). Furthermore, research indicates TPB-based interventions are effective for chronic disease management, particularly in low-resource settings (Paul et al., 2022). In some contexts, scholars have argued that predictive accuracy can be improved by enhancing the original TPB model with additional factors such as past behavior, particularly in energy-saving applications (Andini & Low, 2022).

While TPB provides a structured lens for understanding human behavior, broader behavioral research also encompasses diverse theoretical and methodological approaches. The Human Behaviour Ontology defines "individual human behaviour" as "a bodily process of a human that involves co-ordinated contraction of striated muscles controlled by the brain," offering a comprehensive framework that organizes 230 behavioral classes across experiences, expression, and social interactions (Schenk et al., 2024). Other perspectives focus on Activities of Daily Living, analyzing macro-level tasks and body movement sequences to explain complex behavior (Thakur & Han, 2020). Character Computing approaches behavior through the Character-Behavior-Situation triad, integrating personality traits, cognitive states, and social contexts (Herbert, 2020). Modern technologies further enhance behavioral research through real-time monitoring enabled by sensors and computational models (Dávila-Montero et al., 2021), while machine learning techniques analyze unstructured textual data to detect behavioral indicators and predict patterns (Davahli et al., 2020). Collectively, these interdisciplinary approaches address societal challenges, while scholars emphasize the importance of ecological validity and inclusivity in behavioral studies (Box-Steffensmeier et al., 2022).

Tax compliance represents one important domain of behavior. It is broadly defined as taxpayers' adherence to obligations and regulations, involving awareness and compliance with tax laws established by governments and tax authorities (Javad Dejlani et al., 2024). From a practitioner's perspective, compliance extends beyond taxpayers to include tax authorities, judges, and consultants, encompassing law abidance and risk mitigation (Syamsudin et al., 2023). Tax compliance plays a crucial role in ensuring sustainable government revenue for infrastructure and public services (Esmael Abdu & Mohammd Adem, 2023). However, persistent challenges such as tax system complexity, insufficient awareness, and institutional weaknesses continue to undermine compliance (Esmael Abdu & Mohammd Adem, 2023). Research highlights that tax fairness and isomorphic forces positively influence compliance behavior (Edward Nartey, 2023). At the same time, technology creates mixed effects, potentially reducing traditional evasion opportunities while also introducing new risks (J. Alm et al., 2020). Notably, tax compliance research has grown significantly across countries and disciplines, reflecting the global importance of this issue (Fauzan Fauzan et al., 2022).

In this broader context, small and medium-sized enterprises (SMEs) hold a particularly significant position. Research reveals that SME representation occurs through multiple channels and actors. In emerging markets, SME managers often act as firm representatives by engaging in Interactive Network Branding, where interpersonal interactions shape corporate identity and network positions (Koporcic, 2020). Formal representation in chambers of commerce varies by organizational models, with sectoral approaches offering the most potential for balanced representation (Marciniak, 2024). Policy development for SMEs similarly involves diverse stakeholders, including financial authorities, government agencies, and SME representatives themselves (Permatasari & Gunawan, 2023). At the international level, collaborative platforms such as the OECD bring together financial institutions, policymakers, and SME actors to advance sustainable finance initiatives (Peck et al., 2022). Additionally, institutions such as the SME Ombudsman provide specialized protection for entrepreneurs' rights (Łukawska, 2021). SMEs are also required to maintain proper licensing and legality to ensure effective operations (Maulana et al., 2021). Their significant contribution to national economies underscores the importance of accurate and representative data for policymaking and analysis (Kalemli-Özcan et al., 2024).

The roles of SME representatives are therefore multifaceted. Owners and managers bear responsibility for risk management, requiring foresight and mitigation strategies, though limited resources often restrict their capacity (Havierniková & Betakova, 2020). Representative competencies have a direct influence on financial outcomes, with managerial skills strongly linked to accounts receivable management and performance (Lee, 2021). In the domain of cybersecurity, SME leaders must establish roles and awareness frameworks despite resource constraints (Lejaka et al., 2023). Their responsibilities extend into corporate social responsibility (CSR), where representatives act as adopters, brokers, generators, and transmitters within supply chains (Stekelorum, 2020). Through these activities, representatives not only shape corporate identity and reputation but also strengthen customer loyalty and performance outcomes (Koporcic, 2020).

Decision-making within SMEs further reflects the critical influence of representatives and contextual factors. Social media analytics is shown to enhance innovation and adaptability, strengthening strategic decision-making (Dimas Nugroho & Putri Angela, 2024). Industry and market conditions affect the adoption of Business Intelligence solutions, though market influences remain consistent across sectors (Mirasbek Nurseit & Andrea Tick, 2022). Entrepreneurs' decision-making styles impact SME financial performance, mediated by culture, education, and networks (S. Weerasekara & Ramudu Bhanugopan, 2022). Personal information access also strongly shapes entrepreneurial choices (Mohammad Fotouhi Ardakani & Razieh Khojasteh Avorgani, 2021). Moreover, emotional states influence financial decisions through cognitive heuristics (Nurazleena Ismail et al., 2022). The evidence suggests that informed decision-makers develop proportionate compliance programs, while uninformed ones risk inadequate responses to regulatory pressures (Christian Hauser, 2021). The role of financial information is equally critical, as accounting reports and accounting information systems significantly improve decision-making effectiveness (Hamood Mohammed Al-Hattami, 2022).

SME-level behavior also extends to interactions between representatives, employees, and environmental contexts. Representative brokers, for instance, help moderate the effects of environmental uncertainty on networking, especially under low uncertainty conditions (Srivastava, 2020). Employee behavior is significantly affected by person-organization fit, with innovative behavior mediating performance outcomes (Pudjiarti & Hutomo, 2020). Training perceptions also contribute positively to innovation, mediated by commitment types (Jalil et al., 2021). Strategic orientations such as locus of control and financial attitudes can influence unethical behavior and outcomes (Syariati, 2022). Meanwhile, knowledge sharing facilitates innovative work behavior by strengthening functional flexibility and empowerment (Yasir et al., 2021). Such innovative behavior directly supports business performance through competitive advantage (Firdaus & Sakinah, 2023), while leadership styles, such as transformational leadership, influence justice perceptions and innovation outcomes (Knezović & Drkić, 2020).

ISSN No. 2454-6186 | DOI: 10.47772/IJRISS | Volume IX Issue X October 2025

The specific domain of SME tax compliance has been investigated across multiple dimensions. Studies consistently emphasize tax knowledge as a critical determinant, positively associated with compliance behavior (Timothy & Abbas, 2021) Tax morale is also central, with Timothy & Abbas (2021) identifying morality as the primary driver of compliance among Indonesian SMEs. Enforcement mechanisms such as penalties and sanctions significantly shape compliance, though their effects vary with severity (Ali, 2020). Tax sanctions may also moderate the relationships between knowledge, training, and compliance (Mansur et al., 2021). Service quality from tax representatives plays a notable role (Fadhilatunisa, 2020), while internal accounting practices emerge as the most influential factor for SMEs in Vietnam (Le et al., 2020). Other determinants include modernization of tax systems, financial stability, taxpayer awareness, and transparency (Supriyono et al., 2021).

The application of TPB to SME tax compliance provides valuable insights into these behavioral dynamics. Attitudes toward compliance have been shown to positively influence behavior (Suryanti, 2021), while tax knowledge remains a strong predictor (Timothy & Abbas, 2021). Trust in government and moral obligations further reinforce compliance intentions (Gunawan Alvien et al., 2023). However, subjective norms yield mixed results, with some evidence suggesting SME taxpayers rely more on internal awareness than external pressures (Suryanti, 2021). Enforcement mechanisms such as sanctions maintain positive effects (Kartikasari & Yadnyana, 2020). Both financial performance and perceived behavioral control also contribute to compliance intentions (Hikmah et al., 2021). Ultimately, the literature underscores taxpayer consciousness about the role of tax in national welfare as a primary driver of compliance (Sari & Maradona, 2020).

Overall, TPB has proven to be a robust framework for studying tax compliance across populations. Studies consistently highlight the relevance of its three components of attitude, subjective norms, and PBC in explaining compliance intentions (Bidin & Weheed, 2023). Moreover, the framework has been adapted to different contexts, with extensions incorporating variables such as moral intensity (Al zaqeba & AL-Rashdan, 2020), counterproductive behaviors (Harinurdin et al., 2024), and financial performance (Hikmah et al., 2021). Its applications range from sole proprietorships to SMEs and corporate taxpayers (Harinurdin et al., 2024). Furthermore, cultural adaptations, such as the integration of Islamic values, reflect the flexibility of TPB in capturing different compliance environments (Bulutoding, 2022).

Importantly, empirical studies on SME tax compliance using TPB consistently select SME owners and managers as their respondents. Data are typically collected through surveys and questionnaires directly administered to taxpayers (Gagaring Pagalung & Hamid Habbe, 2021). For example, Hikmah et al. (2021) surveyed 209 SME owners across 11 regencies in Central Java Province, while Bani-Khalid et al. (2022) targeted 385 Jordanian manufacturing SMEs through systematic random sampling. Similarly, Hikmah et al. (2024) engaged 150 SMEs across multiple cities in Central Java. Sample sizes generally range from 98 to 385 participants, focusing on individual MSME taxpayers (Arta & Alfasadun, 2022). This consistent methodological approach positions SME representatives as the central unit of analysis for examining tax compliance behavior through the TPB framework.

Taken together, the reviewed studies demonstrate that the Theory of Planned Behavior provides a comprehensive framework for analyzing SME tax compliance behavior. Its three constructs attitude, subjective norms, and perceived behavioral control align closely with key determinants identified in SME tax compliance research, such as tax morale, knowledge, social influences, sanctions, and financial control. The consistent use of SME owners and managers as respondents further validates TPB's applicability at the organizational level, confirming its suitability for investigating compliance behavior among SMEs.

ISSN No. 2454-6186 | DOI: 10.47772/IJRISS | Volume IX Issue X October 2025

Proposed Conceptual Framework

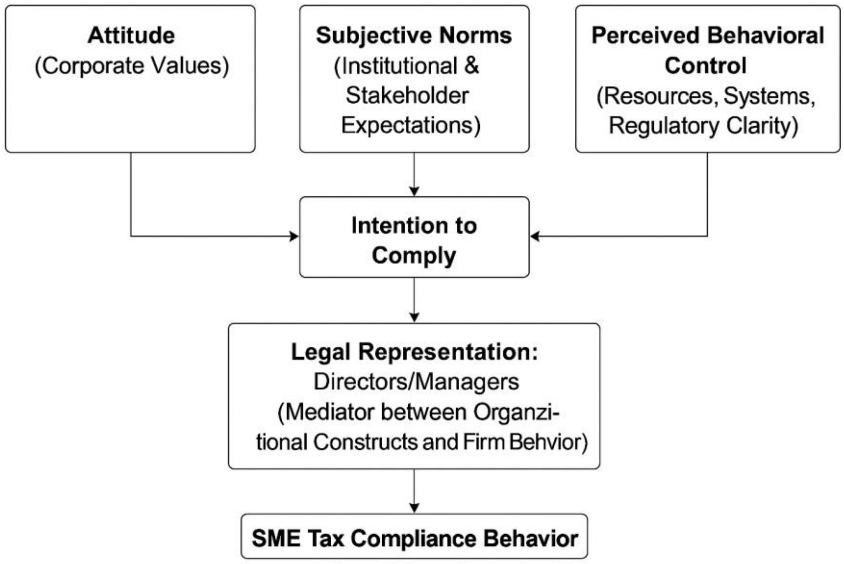

Figure 1. Conceptual framework illustrating the firm-level application of the Theory of Planned Behavior (TPB) to SME tax compliance. Directors and managers act as legal representatives mediating between organizational constructs (attitude, subjective norms, perceived behavioral control) and compliance behavior.

Drawing from the reviewed literature and Malaysia's legal framework, this paper proposes a conceptual model illustrating how the Theory of Planned Behavior (TPB) can be applied at the firm level to explain SME tax compliance behavior. In this framework, directors and managers act as legal and behavioral intermediaries who translate firm-level intentions into compliance actions.

Attitude reflects managerial and corporate values toward taxation and ethical responsibility. Subjective norms represent institutional, regulatory, and stakeholder expectations that shape perceived social obligations. Perceived behavioral control (PBC) captures the firm's perceived capacity to comply, influenced by resource availability, system adequacy, and regulatory clarity. These three constructs jointly influence the firm's intention to comply, which leads to actual compliance behavior. The model situates the legal framework as a structural mediator linking managerial perceptions (as agents) to organizational behavior (as the firm).

The framework provides a basis for future empirical testing using SME-level data and contributes to extending TPB beyond individual agency to collective decision-making within legally recognized entities.

Limitations and Future Research

This review is conceptual in nature and therefore limited by the absence of empirical testing. While it establishes the theoretical and legal foundations for applying TPB to firms, future research should validate these propositions through systematic data collection. One limitation concerns the operationalization of firm-level constructs, as managerial attitudes may not fully capture the collective orientation of an organization. Additionally, contextual differences across industries and jurisdictions may influence how subjective norms and perceived behavioral control are expressed.

Future research should employ mixed-methods approaches combining qualitative interviews with quantitative surveys to capture both perceptual and institutional dimensions of compliance. Structural equation modeling (SEM) can test construct relationships, while case studies could illuminate variations in compliance practices among SMEs of different sizes and sectors. Researchers could also integrate longitudinal data to explore how regulatory reforms and digital transformation affect compliance behavior over time. Finally, challenges such as data accessibility, response bias, and identifying the correct organizational representative must be addressed to ensure validity and reliability.

These directions would advance empirical understanding of how TPB operates within firms and inform the development of behaviorally grounded compliance policies.

CONCLUSION

This study set out to examine whether the Theory of Planned Behavior (TPB) can be validly applied at the firm level to analyze tax compliance among SMEs. The review confirms that TPB offers both conceptual and practical value when adapted to organizational contexts. Importantly, the study contributes not only to SME tax compliance literature but also to the advancement of TPB itself. By applying the framework to firms, which act through legally empowered representatives, it demonstrates the theory's adaptability beyond individual agency and clarifies how its constructs can be mapped to collective decision-making.

The first contribution is theoretical. Theoretically, the study demonstrates that TPB extends from the individual to the organizational level. Attitudes can be interpreted as corporate values and managerial orientations toward taxation. Subjective norms may reflect institutional and stakeholder expectations. Perceived behavioral control can represent the firm's resource sufficiency, system capacity, and regulatory clarity. This alignment strengthens TPB's explanatory scope by operationalizing constructs in a legally and institutionally grounded way.

The second contribution is practical. For policymakers, interventions that encourage positive tax attitudes, simplify regulatory procedures, and enhance perceived control through training, digital tools, and transparent enforcement are likely to improve compliance outcomes. For SMEs, investments in accounting practices, system integration, and leadership alignment can reinforce compliance-oriented values and increase confidence in managing tax obligations.

Beyond general policy recommendations, each construct within the Theory of Planned Behavior offers specific, actionable implications. For attitudes, government agencies such as RMCD and LHDN can implement targeted education programs that emphasize the social and economic value of compliance, thereby strengthening positive tax morale among SME leaders. For subjective norms, policymakers could collaborate with business associations, chambers of commerce, and digital influencers to promote peer benchmarking and public recognition of compliant firms, reinforcing compliance as a shared social norm. For perceived behavioral control, simplification of tax filing procedures through digital tools like MyTax and the provision of online advisory support would directly increase SMEs' confidence and capacity to comply. Collectively, these interventions operationalize TPB constructs into concrete strategies for improving SME compliance at both institutional and behavioral levels.

The third contribution addresses the research gap in applying TPB to firms. By linking constructs to the Malaysian legal framework, this study identifies the natural persons such as directors, managers, and officers through whom compliance intentions are expressed and acted upon. It also outlines methodological directions, including the need to triangulate self-reported survey data with observable indicators such as filing timeliness and audit results, and the importance of distinguishing institutional norms from interpersonal pressures.

In conclusion, the theoretical, legal, and empirical foundations jointly support the proposition that TPB is suitable for investigating SME tax compliance behavior at the firm level. The proposed framework provides a coherent path for future empirical testing, contributing both to the refinement of TPB and to the design of targeted compliance strategies. Although the study is grounded in the Malaysian context, its implications extend internationally. By focusing on the legal and institutional mechanisms through which firms act, the framework offers a transferable model that can be applied across different jurisdictions, enhancing both its academic significance and practical relevance for improving SME tax compliance globally.

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ISSN No. 2454-6186 | DOI: 10.47772/IJRISS | Volume IX Issue X October 2025

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