

PETERKA PARTNERS

YOUR CEE LAW FIRM

NEWSLETTER
March 2025



Czech Republic Slovakia Ukraine Bulgaria
Poland Romania Hungary Croatia Slovenia

www.peterkapartners.com



PETERKA PARTNERS' new office in Rzeszów, Poland

We are pleased to share exciting news about the opening of our new office in **Rzeszów**, the capital of the Subcarpathian Voivodeship in southeastern Poland, near the Polish-EU/Ukrainian border. This expansion is an important step for our firm's growth, reinforcing our presence in Poland and CEE region as a whole.

The Rzeszów office is being led by our Senior Associates, **Dagmara Klimek** and **Dawid Lewicki**, experienced Polish attorneys who have been appointed as Directors of the office. The team at Rzeszów will focus on providing legal support to international and domestic clients while further developing our presence in the region.

PETERKA PARTNERS
YOUR CEE LAW FIRM

Dagmara Klimek
Senior Associate,
Director of the Office in Rzeszów

Dawid Lewicki
Senior Associate,
Director of the Office in Rzeszów

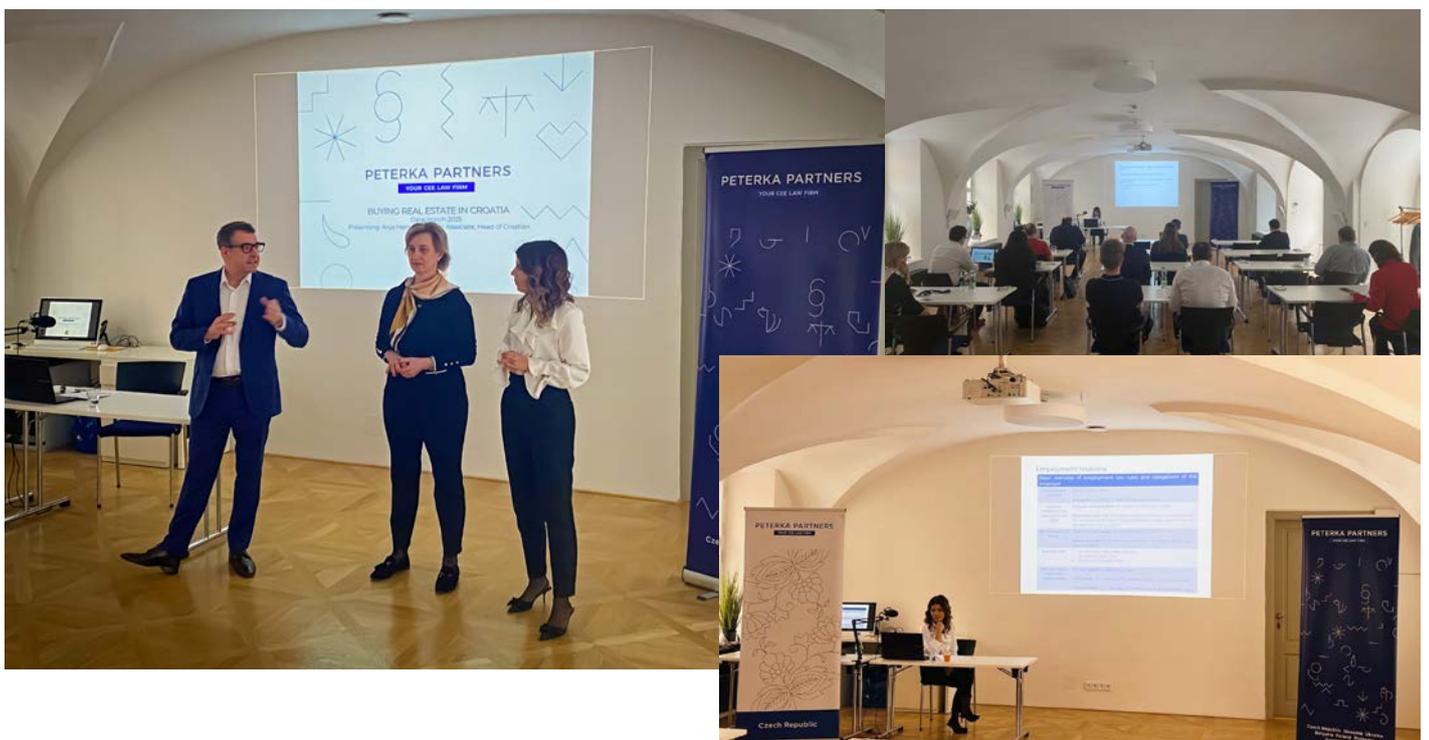
PETERKA PARTNERS hosted an exclusive seminar focused on key aspects in purchasing real estate and doing business in Croatia

On the 25th of March, PETERKA PARTNERS hosted on the premises of our headquarters, **Braunův dům**, an exclusive seminar focused on key aspects in purchasing real estate and doing business in Croatia.

Attendees gained valuable insights into the legal, financial, and regulatory aspects of investing and doing business in Croatia, guided by experienced lawyers. Important aspects we covered, such as acquisition by foreigners, legal procedures, land registry, taxation, key considerations before purchasing property, company formation, employment regulations, foreign investment rules, and corporate taxation.

Experts shared key legislative information, including practical aspects of all covered topics. We would like to thank our guests for attending.

If you missed this event but are interested in Croatia, follow our [LinkedIn](#) for our upcoming seminars!



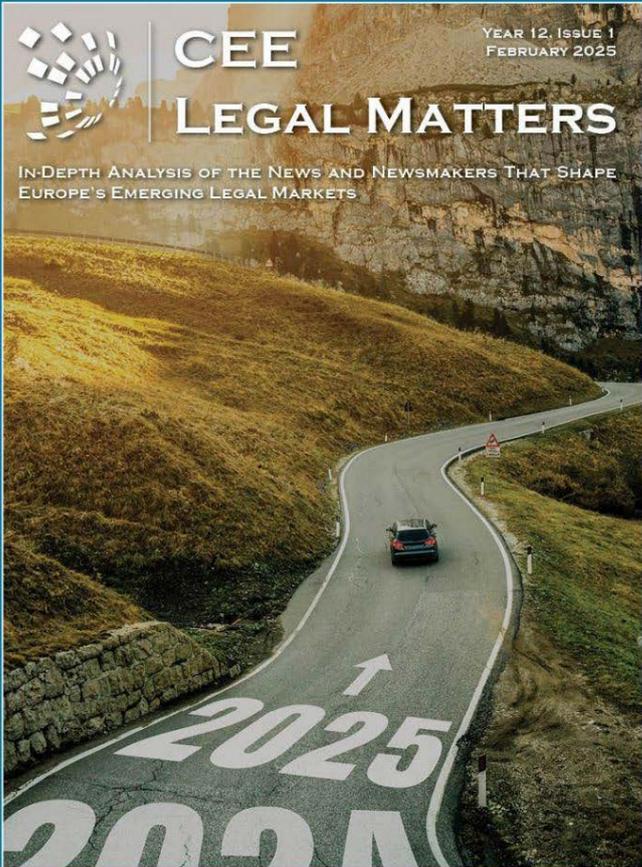
Our contribution to the CEE LEGAL MATTERS magazine

In the latest issue of CEE Legal Matters Magazine, PETERKA PARTNERS', Partner and Director for Czech office, **Adéla Krbcová**, discusses key trends shaping labor legislative in the Czech Republic. With labor laws continuing to shift in response to economic, technological, and geopolitical developments, understanding these changes is crucial for businesses and legal professionals alike.

Read the full interview [HERE](#).

ISSUE 12.1

An Outlook on 2025: Labor in the Czech Republic



Adela Krbcova
Partner
Peterka & Partners

ceelegalmatters.com

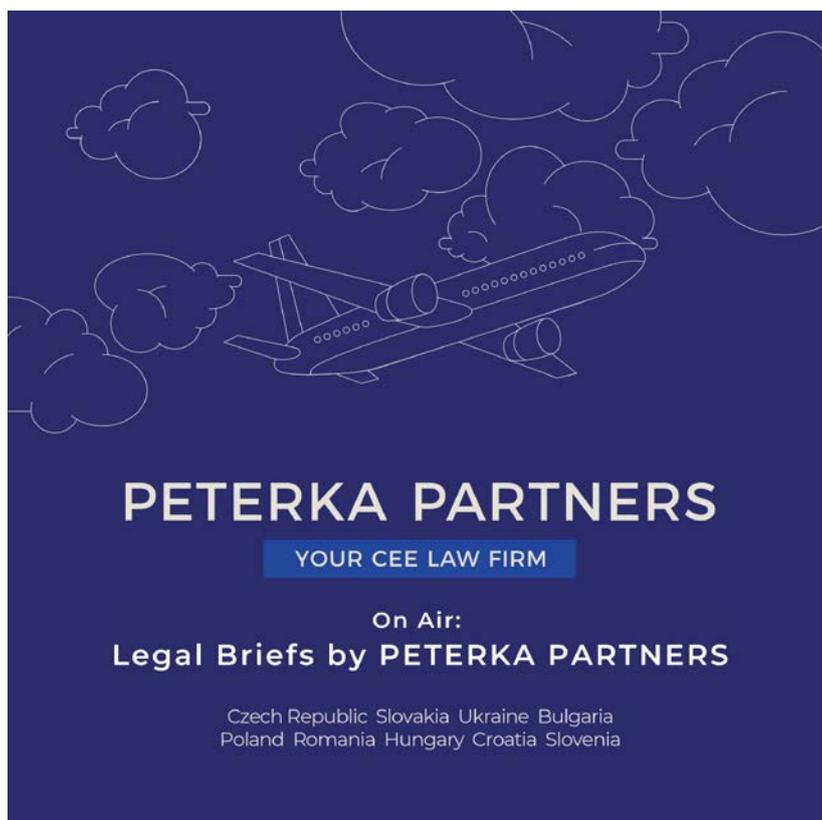
Introducing On Air: Legal Briefs by PETERKA PARTNERS

We are excited to share **On Air: Legal Briefs by PETERKA PARTNERS**, a dedicated monthly newsletter covering key legal developments in **aviation law** and passenger rights.

We share here our aviation highlights on recent successes in defending aviation claims relating to network outages, fog delays, and runway closures.

In the second issue, **Martyna Ryś-Wilgus**, Attorney at Law, Aviation and Litigation Leader at **PETERKA PARTNERS**, analyzes a significant second-instance court judgment concerning French air traffic control (ATC) strikes. These strikes are disrupting air traffic in Europe, forcing airlines not only to cancel flights but also to extend flight routes due to the crucial location of France in Europe. The Court confirms that these are extraordinary circumstances over which airlines have no control.

The latest issue explores recent court decisions shaping passenger claims under EU Regulation 261/2004.



Read the first issue [HERE](#), second issue [HERE](#), and third issue [HERE](#).

Recognized once again for Corporate/M&A Excellence by CHAMBERS

The Chambers Global Guide 2025 has released a month ago, but we are still proud to share that our **Slovak office** has once again been ranked among the leading law firms in **Corporate/M&A in Slovakia**. Even more impressive, we remain the only Slovak firm recognized for **Corporate/M&A (Foreign Expertise) – France**.

This achievement is a testament to the dedication and expertise of our outstanding Corporate and M&A team, led by **Lubomír Leško**, Partner and Director for Slovakia, and **Ján Makara**, Partner.

Our recognition for foreign expertise in France wouldn't have been possible without our colleagues from the French Desk, led by **Andrea Butašová**, Partner and Leader of the French Desk and **Markéta Hanzlíková**, Leader of Family and Inheritance Law and French Desk. Their expertise and deep understanding of French business culture and environment has been essential to our successful collaboration with Francophone clients over the years.

A sincere thank you to our clients for your continued trust and support. Your confidence in our team allows us to excel and deliver outstanding legal services.



Chambers and Partners rankings for Europe Guide 2025 published

PETERKA PARTNERS once again confirmed its positions in the Czech Republic and Slovakia as one of the **leading law firms** in the **Employment and Corporate/M&A** practice areas.

We are also very proud of the personal recognition of Partner and Director for Czech office, **Adéla Krbcová** and Partner and Leader of Real Estate, **Ondřej Dušek**, from the Czech Republic and Partner **Ján Makara** and Senior Associate and Leader of Compliance and Regulatory **Kristína Ňaňková** from Slovakia as **Notable Practitioners**.

Thank you for your hard work, and congratulations!

We are grateful for this recognition and for the incredible support we have from our clients:

"PETERKA PARTNERS are flexible and highly professional. They're strong in business topics as well as in the implementation of legal regulations."

"PETERKA PARTNERS have always provided everything we've asked for. Thanks to them, we can always count on having everything in order, prepared and completed."

"PETERKA PARTNERS' lawyers have an individual customer approach and speed, and offer multiple solution options."

"They are very responsive, very positive and provide on-point advice."

"The lawyers are very hands-on and are dedicated to the project."



Expansion of Our German Desk

We have also recently expanded our German Desk with the appointment of **Jan Hlubuček**, Senior Associate and now Leader of German Desk. An experienced Czech attorney-at-law based in our Prague office, Jan Hlubuček joins **Gábor Juhász**, Senior Associate and Deputy Director for our Hungarian office, who has been successfully developing our German Desk for the past several years.



PETERKA PARTNERS
YOUR CEE LAW FIRM

**NEW CO-LEADER AT
PETERKA PARTNERS
GERMAN DESK**

JAN HLUBUČEK
SENIOR ASSOCIATE
LEADER OF GERMAN DESK
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GÁBOR JUHÁSZ
SENIOR ASSOCIATE
DEPUTY DIRECTOR FOR HUNGARY
LEADER OF GERMAN DESK
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Fluent in German, **Jan Hlubuček** will serve as a key contact for companies from Germany, Austria, and other German-speaking countries looking to enter or expand their presence in CEE. His expertise strengthens our ability to provide comprehensive legal support tailored to the needs of businesses operating in the region.

For years, the **German Desk at PETERKA PARTNERS** has been a trusted partner for leading corporations from the DACH region, offering integrated legal solutions across CEE markets. With this strong leadership, we look forward to continued success and valuable partnerships with our clients.

PETERKA PARTNERS opens a brand new Language desk

We are thrilled to announce the launch of our brand-new **Italian desk**, dedicated to provide tailored legal support to our Italian clients across CEE!

The Italian Desk is supported by professionals from our ten offices, with **Zagreb** and **Bucharest** serving as the main point of contact due to Croatia's and Romania's cultural, geographical and historical ties to Italy.

The decision to establish Italian Desk was driven by the evolving Italian economy, recent significant projects, and increased interest in cooperation between Italian and CEE companies.

The desk provides comprehensive legal services to **Italian businesses operating** in the CEE region and **CEE companies expanding into Italy**. The "two-way-street" approach is reinforced by a "one-stop-shop" service, allowing clients to coordinate legal services across different jurisdictions.

If you need professional legal help in Italy, do not hesitate to contact our colleagues [HERE](#).



New episode of M&A podcast – now in English

We are pleased share that our **M&A podcast**, exploring key aspects of mergers and acquisitions across Central and Eastern Europe, is now available in English.

In this episode, **Agnieszka Siwińska** and **Dorota Płoskowicz**, Partners and Directors for **PETERKA PARTNERS'** Warsaw office and M&A Practice Group Leaders, provide an in-depth discussion on the key differences in M&A transactions across Poland, the Czech Republic, Slovakia, Ukraine, Croatia, Bulgaria, Hungary, and Romania.

The discussion covers differences in M&A processes across CEE jurisdictions, a comparative analysis of legal frameworks, and practical insights into navigating complex transactions in the region.

Listen to the podcast now on [Youtube](#) and [Spotify](#).

PETERKA PARTNERS
YOUR CEE LAW FIRM

M&A PODCAST

EPISODE 2

AGNIESZKA SIWIŃSKA
PARTNER, DIRECTOR FOR POLAND
LEADER OF M&A PRACTICE GROUP

DOROTA PŁOSKOWICZ
PARTNER, DIRECTOR FOR POLAND
LEADER OF M&A PRACTICE GROUP

BRAND NEW PODCAST BY PETERKA PARTNERS

PETERKA PARTNERS became a proud member of the Polish-Romanian Bilateral Chamber of Commerce and Industry

We are proud to share, that PETERKA PARTNERS is the newest member of the Polish-Romanian Bilateral Chamber of Commerce and Industry and in honor of that, the Polish team at PETERKA PARTNERS had the great pleasure of attending a reception celebrating the Day of Polish-Romanian Solidarity on March 6, at the Piłsudski Museum in Sulejówek. This prestigious event brought together key representatives from the business, diplomatic, and cultural sectors, fostering meaningful connections and collaboration.

The evening featured networking opportunities, an official welcome speech, Romanian wine tasting, and an exclusive tour of the Museum's exhibition led by Professor Grzegorz Nowik.



As part of our commitment, our team will collaborate closely with the Chamber, engaging in trade missions and industry events. Representing our Warsaw office, Partner, Director for Polish office and Leader of M&A, **Dorota Płoskowicz** and our Senior Associates, **Agata Jaczyńska**, and **Agata Kamińska**, attended the event, while our Romanian team - Partner, Director for Romania, **Cosmina Romelia Aron** and our Senior Associate and Deputy Director for Romania, **Ioana Sebestin-Nazâru** - is equally engaged in Bucharest in strengthening Polish-Romanian relations.

 Polish-Romanian
Bilateral Chamber
of Commerce and Industry

We are proud to welcome our new member!

PETERKA PARTNERS

YOUR CEE LAW FIRM

PETERKA PARTNERS attended #PRVNÍCH100LET gala

Our colleagues had the pleasure to attend this year's gala hosted by #PRVNÍCH100LET (žen v právu) project, which we are supporting as partner as this is an organization that celebrates women in law.

Our Partner and Director of Czech office, Adéla Krbcová, had the honour of handing over the Flamma Award to the winner in front of more than 300 inspiring women in law.

This was the third year in a row we supported this important initiative empowering women in law in the Czech Republic and Slovakia.



BULGARIA

Proposed Amendment to Interest Rate Limits

A draft amendment to the **Obligations and Contracts Act** proposes a differentiated limitation on the statutory interest rate for default depending on the debtor's status as a trader or an individual/entity not engaged in commercial activity. The proposal aims to reduce the financial burden on natural persons with limited resources, in accordance with EU legal principles. Under the proposal, the interest rate for traders would be capped at the base interest rate plus eight percentage points, while for all other debtors, the cap would be the base interest rate plus four percentage points.

Supreme Court Ruling on Employer's Good Faith

In a new decision by the **Bulgarian Supreme Court**, the issue of good faith and intent in **employer obligations** was discussed. The case involved a retired employee who was not paid the full severance as stipulated by the collective labour agreement due to the employer's failure to inform employees about the agreement. The court clarified that good faith is a general principle in labour law, but it only has legal significance when specifically stipulated by law. Since the matter of whether the employer acted in good faith was irrelevant in this case, it was not considered when assessing whether the employer had fulfilled its obligations.

Advancements in Bulgaria's FDI Screening Framework

Bulgaria is progressing with its **Foreign Direct Investment** (FDI) screening regime, with the Council of Ministers approving the Rules for the Organization and Operation of the **FDI Screening Council**. This is a key step in finalizing the **FDI framework**, providing clarity on the **council's structure**, decision-making, and operational processes. It organizes and coordinates the actions of state authorities in this field and outlines the operational framework for the Interinstitutional **Council for Foreign Direct Investment Screening** responsible for monitoring foreign direct investment screening in Bulgaria

CROATIA

New minimum wages and personal deductions from January 1, 2025

As of January 1, 2025, the **minimum gross salary** of an employed member of the management board **has increased**. It cannot be lower than EUR 1,168.70 per month in gross amount, which is an increase of EUR 154.70 compared to the previous year. The minimum gross salary for year 2025 amounts EUR 970.00, while in 2024 it was EUR 840.00. The personal deduction for year 2025 amounts EUR 600.00, while in 2024 it was EUR 560.00.

Youth Employment Incentive Abolished

As of January 1, 2025 an important and popular incentive was abolished. It **exempted employers** who employed unemployed people under the age of 30 **from paying contributions on their salaries during the first five years of employment**. All employers who employed people under the age of 30 till December 31, 2024, will be able to continue to use this measure until its expiration.

Amendments to the Law on Foreigners

The new law has entered into force on March 15, 2025, save for the provisions relating to the verification of misdemeanour sanctions for employers for the most serious violations of employment relations, social security or occupational safety. Namely, the latter provisions will enter into force on January 1, 2026. These amendments enable residence and work permits to be issued for up to 3 years (instead of one year as before), depending on the duration of the employment contract, and residence and work permits for seasonal work for up to 9 months (instead of the previous 6 months). Changing occupations with the same employer and changing employers in practice will not necessarily lead to the need to issue a new residence and work permit. The above is now possible within the validity period of the residence and work permit without additional administrative burden.

CZECH REPUBLIC

Good reputation of legal entities

The **Constitutional Court of the Czech Republic** adopted a landmark decision recognizing that legal entities, such as companies, have the right to protection of their reputation, and in the event of damage to their reputation, adequate compensation for non-pecuniary damage may be claimed.

Amendment to Energy Act

The **Parliament of the Czech Republic** passed an amendment (lex OZE) to the **Energy Act** to ensure **better consumer protection**. For fixed-term contracts, energy suppliers will have to prove that they purchased at least 70% of the volume of energy supplied, otherwise the consumer has the right to withdraw from the contract. The amendment is also intended to bring better balance to the energy grid and simplify the connection of solar panels.

Omnibus Legislative Packages

The **European Commission** has presented draft Omnibus I and Omnibus II legislative packages proposing changes to the number of EU ESG legislative acts, such as the **CSRD** and **CS3D Directives** and the **EU Taxonomy Regulation**, in order to facilitate ESG obligations. The Czech Republic has partially implemented the CSRD Directive with respect to the first wave of the obliged entities. Currently, the bill implementing the second part of the CSRD Directive obligations, that is, for the second and third wave of the obliged entities is in the legislative process. The draft Omnibus packages propose, for example, to narrow the range of obliged entities by some 80% and limit the scope of reporting itself. We are monitoring the legislative process at both the EU and local level.

Reporting of obliged persons under AML

An amendment to the **AML Act** expands the range of persons obliged to report to the **Financial Analysis Authority**. This obligation now also applies to entrepreneurs operating activities within the scope of a free trade, if their activities fall within the category of obliged persons. These persons have to familiarize themselves with the new obligations and ensure their fulfilment in order to avoid violating the law.

First wave of obligations under AI Act

As of 2 February 2025, the first wave of obligations under the **AI Act Regulation** (Regulation (EU) 2024/1689), which provides a unified legal framework for the regulation of artificial intelligence in the EU, came into force. The first phase of regulation focuses on prohibiting AI systems that pose an unacceptable risk, such as the manipulation of human behaviour, real-time biometric identification in public places, and social evaluation of individuals.

Flexi Amendment to Labour Code

If you have not yet received our special leaflet summarizing the most important changes to **Czech labour law** expected to come into force on 1 June or 1 July 2025, please feel free to contact the **leader of our Employment Practice**, Ms. Adéla Krbcová (krbcova@peterkapartners.cz).

HUNGARY

Modification of eligible countries for guest workers

Hungary has **introduced new regulations for the employment of guest workers from third countries**. These updates specify the eligible countries (Georgia, Armenia, and the Philippines) and the permit requirements (employment-related & guest worker residence permits) to align with Hungarian labour market needs and compliance standards.

Introduction of liability insurance for construction contractors

All Hungarian **construction contractors** need to have **mandatory liability insurance** from 15 January 2025 in order to cover personal injury and damages to property including the associated costs caused in the course of their construction activities.

End of European Online Dispute Resolution (ODR) platform

The **European Online Dispute Resolution (ODR)** platform, which was to protect consumers in cross-border EU commerce, **will be discontinued** on 20 July 2025. No new complaints will be accepted as of 20 March 2025. This means that all current references to the ODR Platform shall be removed from the information currently provided to consumers, e.g., in general terms and conditions and/or on websites, as the remaining information may even mislead consumers.

POLAND

New rules for hiring foreigners

A **new law eliminates the labour market test**, introduces full electronification of procedures, and a hybrid documentation system. **Hiring foreigners will require more diligent record-keeping and greater transparency**. Employers must prepare for intensified inspections and greater exposure to penalties related to potential non-compliance.

Changes to collective labour agreements

The new regulations, which came into force on 1 January 2025, represent a significant change in **Polish labour law**. The changes are particularly important for employers, as they simplify procedures for concluding and registering collective bargaining agreements, as well as allow greater flexibility in adjusting terms and conditions of employment to the needs of employees and changing market realities.

E-Delivery system

On 1 January 2025, the **use of the e-Delivery system was made mandatory**. The new system is ultimately intended to replace existing forms of communication, such as ePUAP or registered letters, and will become a standard tool for exchanging correspondence between offices, courts, and businesses. E-Deliveries are the electronic equivalent of registered letters with acknowledgment of receipt.

ROMANIA

New procedure for establishing minimum wage

As of 6 February 2025, the **minimum wage** guaranteed for payment in Romania is set and **updated annually** by the sum of the average annual rate of inflation forecast and the annual real growth rate of labour productivity forecast.

New obligations with respect to hiring persons with disabilities

As of January 2025, in order to ensure that 4% of the workforce consists of persons with disabilities, any **private legal entity** having at least 50 employees must **request the assistance** of at least **3 non-governmental organizations**, submit the request to the relevant Romanian authorities, and annually submit a report.

New rules on harassment

As of 3 February 2025, **employers are obliged to adopt procedures** that include methods ensuring **monitoring and supporting victims**, as well as preventive mechanisms consisting of specialized counselling and guidance, and referrals may be submitted by the victim unsigned.

New rules regarding use of electronic fiscal cash registers

Economic operators are not obliged to print/provide fiscal receipts through electronic fiscal cash registers to customers for payments made using credit/debit cards and in the case of vending machines that operate exclusively on payments by card, an electronic fiscal cash register is not mandatory.

Changes with respect to foreign investments

The definition of **EU investors** has been amended in order to encompass natural persons holding Romanian citizenship who invested, or intend to invest, in Romania.

SLOVAKIA

NIS2 transposition in Slovakia: Registration and Obligations under Cybersecurity Act

Subjects in newly regulated sectors must perform self-identification under the Slovak **Cybersecurity Act** and notify the **National Security Authority** by the end of February 2025 via an official form. Security measures must be implemented within 12 months after registration.

Increase of basic travel allowance

From 1 March 2025, the basic travel allowance per kilometre of travel for employees using their own vehicle for business trips will be increased. The new amounts will be EUR 0.080 for two-wheelers, three-wheelers, and quadricycles, and EUR 0.281 for passenger cars.

Increase in amounts for meal allowances

The **Ministry of Labour, Social Affairs and Family of the Slovak Republic** has announced new amounts for **meal allowances** for **domestic business trips**, effective from 1 April 2025. The new amounts will be EUR 8.80 for 5 to 12 hours, EUR 13.10 for 12 to 18 hours, and EUR 19.50 for more than 18 hours. This also increases the amount of the maximum compulsory meal allowance to EUR 4.84, as well as the minimum value of the meal voucher (EUR 6.60) and the financial contribution for meals (EUR 3.63).

New Construction Law

The new **Construction Act**, which will come into force on 1 April 2025, **aims to simplify and speed up construction procedures, reduce administrative costs**, and make the administration of construction permits more efficient. One of the most significant changes is the merging of planning and construction procedures into a single process, shortening the construction permit process. All constructions of up to 50 m² on private land will only need to be notified about and no construction permit will be required. The new Construction Act also introduces a new definition for minor constructions and building alterations. Minor constructions with a built-up area of up to 50 m² will not require any notification unless they are located in public spaces or in close proximity to neighbouring land.

Extension of temporary shelter for refugees from Ukraine

The **Slovak government** has officially extended temporary **protection of Ukrainian refugees** until 4 March 2026. Under the adopted resolution, temporary protection will be automatically and repeatedly extended in line with decisions by the Council of the European Union, simplifying the process and removing the need for separate approval by the Slovak government for future extensions.

SLOVENIA

Increase in Mandatory Health Contribution from March 2025

Starting on 1 March 2025, the **mandatory health contribution** will be adjusted based on the growth of the average gross salary in 2025, increasing from EUR 35.00 to EUR 37.17. The new amount will first be applied to the March 2025 payroll, payable in April 2025.

Supreme Court of Republic of Slovenia: No Specific Legal Form Required for Share Purchase Agreements for LLCs

In another landmark decision, **the Supreme Court** clarified that no special form is required for the share purchase agreements of business shares in LLCs as an obligational legal transaction. Previously, such agreements were concluded by notarial deeds. Share transfer agreements, however, must still be executed by notarial deeds.

Amendment to Companies Act

The recently adopted amendments to the **Companies Act** (ZGD-1M) enhance transparency in business operations, focusing on reporting and gender balance. Key updates include mandatory sustainability reporting for large companies and those listed on the stock exchange. The law also pushes for better gender representation on company boards, setting specific targets for gender balance.

SKD 2025: New Standard Classification of Activities Takes Effect

The New Standard Classification of Activities (SKD 2025) came into effect in January 2025, replacing SKD 2008. A key change is that SKD 2025 covers a broader range of business activities. The activities were automatically updated in the business register, but companies should verify them. Additionally, businesses with activities defined in their founding acts must align with SKD 2025 upon their first amendment.

UKRAINE

Martial law extended for 90 days

Martial law was extended on 8 February 2025 for 90 days. This means that all related restrictions will remain in place till 9 May 2025.

Changes in employment of disabled persons

From 1 January 2026, an employer will have the choice to **hire a required amount of persons with disabilities** or **instead pay a specific contribution**. Among other changes, employers will have the right to incentives and compensation if employing persons with disabilities.

Economic Code of Ukraine (ECU) abolished

Abolishment of the ECU entails a huge number of changes in the regulation of the operation of certain types of legal entities, most of which are to be enacted from 28 August 2025. The transition period for implementation of the changes is 3 years, until 28 August 2028.



BULGARIA

Provision of non-financial information

As of 1 January 2025, the threshold for **mandatory VAT registration** is increased from a turnover of BGN 100,000 (approximately EUR 50,000) to BGN 166,000 (approximately EUR 85,000) over a period of not more than 12 subsequent months.

Proposed amendments regarding secondary additional tax in global taxation

The **Ministry of Finance** has proposed extensive amendments as regards the rules on **secondary additional tax** in global taxation introducing a formula to calculate secondary tax and its distribution to members of a multinational group of entities, simplified regime of secondary taxation, treatment of qualified tax advantages in case of qualified share in property, rules on exclusion of income from waiving of debts, and others.

Proposed amendment regarding national additional tax in global taxation

A recent proposal by the **Ministry of Finance** introduces rules to determine the last tax period for the purposes of national additional tax to be imposed on entities subject to global minimum tax upon their liquidation as well as on declaring and payment of such tax.

Proposed introduction of standard audit file for tax purposes

A recent proposal by the **Ministry of Finance** sets out an obligation for creation of a standard audit file for tax purposes to all traders with some exceptions such as, e.g., micro entities which do not have a **VAT registration** and **trade representation offices**. The amendments set out the mandatory content of the file and deadline for filing by the 14th of each month with some exceptions. Newly founded companies will not be obliged to provide such file for the first six months. The proposed sanctions for legal entities vary from BGN 5,000 (approximately EUR 2,500) to 30,000 (approximately EUR 15,000).

Proposed amendments to allow donations by legal entities

The **Ministry of Finance** has proposed amendments to allow legal entities to make donations to the central budget so as to support the financing of public investments. As per the proposal, such donations are to be recognized for tax purposes when determining corporate tax.

CZECH REPUBLIC

Crypto-assets – personal income tax exemption

The new amendment to the **Income Tax Act** brings favourable tax exemptions for individuals holding crypto-assets. If the total annual gross income from sales of crypto does not exceed CZK 100,000 (€4k), exemption may be claimed. Income from sales of crypto held over 3 years is exempt up to the aggregate annual threshold of CZK 40 million (€1,600k) which is common for crypto, securities, and shares in corporations.



VAT – registration thresholds

The VAT registration thresholds changed in 2025. Newly, the threshold of CZK 2 million (€80k) is monitored in a calendar year rather than within any twelve consecutive months. Moreover, a new threshold of CZK 2,536,500 is established for one-off exceeding of this threshold and for registration purposes.

VAT – overdue receivables and debts

From 2025, the rules for output VAT corrections regarding overdue receivables are less strict. For small receivables up to CZK 10,000 including VAT and overdue for over 6 months, it is possible to correct the VAT base if the debtor is informed in writing twice and the annual total corrected amount towards one debtor does not exceed CZK 20,000. On the other side, the recipient is liable to correct (reduce) the input VAT deduction on receivables overdue for more than 6 months.

VAT – changes to VAT deduction

From 2025, it is possible to claim input VAT deduction until the end of the second calendar year following the year when the right arose which is negative change compared to the situation before 2025.

Regarding outputs, VAT base corrections may be made within 7 years, subject to conditions.

VAT – recipient's liability to pay VAT

Liability for unpaid VAT might become more common. From 2025, the proof of burden (inter alia the knowledge test: knew or should have known and could have known) is shifted from the tax authorities to the taxpayer. The recipients should be able to prove that they acted in good faith and have collected the relevant documentation.

HUNGARY

Certain personal income tax benefits are no longer available to third-country nationals

From 1 January 2025, **third-country nationals** (citizens of non-EEA countries and countries that do not have a bilateral social security agreement with Hungary) **will no longer be entitled to certain personal income tax benefits.**

Increase in scope of persons obliged to open a payment account

As of 1 January 2025, **the Hungarian branch** of a foreign company is explicitly mentioned among those obliged to open a payment account.

Car tax, company car tax

From 1 January 2025, the car tax rate shall increase annually by the rate of inflation in July of the previous year. The rate of company car tax also changed from 1 January 2025 (increasing by around 20%) and will be adjusted annually from 1 January 2026 according to the rate of inflation in July of the previous year.

Changes to scope of companies subject to audit

The number of companies required to be audited has been reduced, as the threshold of net turnover – averaged over two previous financial years – has been increased from HUF 300 million to HUF 600 million.



POLAND

New minimum income tax regime

31 March 2025 marks the deadline for the first payment and filing of a CIT tax return concerning the minimum income tax regime. Many Polish **CIT taxpayers** are facing **issues** when reconciling the **minimum income tax**, as the tax provisions are highly uncertain. It is expected that the Polish Ministry of Finance will issue an official explanation on this topic.

New explanations concerning withholding tax regime (WHT)

Based on the newest announcements coming from the **Polish Ministry of Finance**, it is expected that **brand new explanations** as regards the Polish WHT regime will be published in April. It is assumed that new explanations will clarify some of the currently existing doubts concerning the i.a. look-through approach and business substance of foreign-based entities.

Potential major overhaul of Polish tax regime

Recently the Polish government has set up a deregulation commission which is to propose important changes to the Polish tax and social security system that are aimed at i.a. easing the conditions for entrepreneurs to conduct business activities. Some of the initially proposed changes include: (i) removing the provisions that allow tax offices to interrupt the statute of limitations just before the statutory period expires, (ii) and increasing the number of general tax rulings issued by the Polish Ministry of Finance.

ROMANIA

Deadline for submission of financial statements extended

The deadline for companies to submit their annual financial statements for the 2024 fiscal year to the **Fiscal Authority** is 31 May 2025. However, since this date falls on a Saturday, the submission deadline has been extended to Monday, 2 June 2025.

Authorized signatories for financial statements

Annual financial statements and accounting reports must be **signed by the legal representative**, along with the economic director, chief accountant, or another legally-authorized individual holding this role under an employment contract.

Submission of financial statements and other related documents

Starting with the 2025 financial year, annual financial statements must be submitted in electronic format only. Moreover, as of 1 January 2026, financial statement reports, notes, and other documents accompanying financial statements have to be transmitted exclusively in electronic format.



SLOVENIA

Higher Corporate Profit Tax due to Flood Recovery

Following the devastating floods of 2023, lawmakers enacted the Reconstruction, Development, and Financial Resources Act (ZORZFS). As a result, the corporate income tax rate will increase from the standard 19% to 22% for the tax year 2024 and remain at this level through 2028. The increase aims to secure funding for post-flood recovery, with an estimated annual impact of €250 million on businesses.

New VAT Record-Keeping Obligations from July 2025

From 1 July 2025, VAT-registered taxpayers must maintain two records—for calculated VAT and deductible VAT—and submit them electronically to the tax authority. Based on these records, the tax authority can prepare a pre-filled VAT return.

UKRAINE

Transfer pricing rules amended

As of 1 January 2025, a number of changes came into effect in regards to **transfer pricing rules**. Among other changes, the list of affiliation criteria was extended and the amounts of fines for non-compliance were changed.

New rules for filing tax reporting

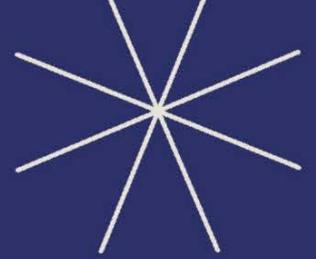
From 1 January 2025, all legal entities and private entrepreneurs who have employees shall **submit tax reporting on personal income tax** and the unified social contribution for the period starting from January 2025 on a **monthly basis** and **in a new form**.

Appellate Court rules on specific permanent establishment criteria

The court established that a non-resident which is focused on investment management has a permanent establishment in Ukraine in view of the discretionary nature of its agent's activities in Ukraine, those being the authority to vote at general meetings of subsidiaries, sign charters, and enter into agreements without any prior approval of the non-resident.

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YOUR CEE LAW FIRM



PETERKA PARTNERS is an independent full-service law firm with a special commitment to the region of Central and Eastern Europe. The only truly Central Eastern European law firm that has built its own strong regional presence in key markets, PETERKA PARTNERS offers a pan-regional legal and tax competency and dynamic alternative to the top law firms, both international and purely local, on these markets.

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For further information on any of the issues discussed in this edition of the Newsletter, or if you should have any other enquiries, please contact us through the contacts listed below or visit our website at www.peterkapartners.com.

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