

Arm's length interest rates for 2025

Tax Alert

March 2025



Ministry of Finance ("MF") has adopted the Rulebook on arm's length interest rates for 2025 ("the Rulebook"). The Rulebook was published in the Official Gazette of Serbia No. 17/2025 dated 28, February 2025 and is effective as of 8, March 2025.

Impact of the Rulebook to transfer pricing documentation for 2025

According to the provisions of Article 61 of the Corporate Income Tax Law ("the CIT Law"), in determining arm's length interest expense/revenue, taxpayers can:

1. use interest rates as prescribed by the MF Rulebook or
2. apply general OECD based methods for assessment of arm's length interest as prescribed by the CIT Law.

Taxpayers may opt only for one of the above options. Selected option needs to be consistently applied to all intercompany loans.

The Rulebook prescribes separate interest rates for long-term and for short-term borrowings for all non-finance entities and a single interest rate for banks and finance leasing companies (except for RSD denominated loans where interest rate is prescribed separately for short term and long term loans).

Arm's length interest rates for 2025 as prescribed by the MF

| Arm's length interest rates for 2025 as prescribed by the Rulebook | | | | |
|--|---------------------------------------|-----------------|------------------|-----------------|
| Credit/loan currency (including dinar loans denominated in another currency) | Banks and financial leasing companies | | Other companies | |
| | Short term loans | Long term loans | Short term loans | Long term loans |
| RSD | 3.92% | 0.81% | 8.01% | 8.24% |
| EUR | | 4.59% | 6.41% | 6.79% |
| USD | | 5.26% | 8.31% | 3.40% |
| CHF | | 2.75% | - | 7.50% |
| SEK | | 4.09% | - | - |
| GBP | | 1.71% | - | - |
| RUB | | 3.25% | - | - |

What impact may this have on your business?

Compared to 2024, it can be determined that the interest rate for loans in CNY for banks and financial leasing companies has not been published this year.

It is necessary to review if new interest rates for 2025 are aligned with interest rates currently applied in your related party financial instruments. In addition, companies exposed to significant / long-term related party financing should consider applying general OECD based methods for assessment of arm's length interest as prescribed by the CIT Law, as such approach may be more beneficial and provide increased level of certainty in relation to future tax treatment.

If you have any questions or need the support of our experts, feel free to contact us at tax@kpmg.rs

KPMG will continue to monitor all relevant developments in this complex area and inform you about possible impact of these events on business operations.

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Contact details

KPMG d.o.o. Beograd

Milutina Milankovica 1J

11070 Belgrade, Serbia

T: +381 11 20 50 500

F: +381 11 20 50 500

tax@kpmg.rs

kpmg.com/rs

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