

Amendments to the Law on Tax Procedure and Tax Administration adopted

Tax Alert

December 2025

Parliament of Serbia adopted the Law on Amendments to the Law on Tax Procedure and Tax Administration (hereinafter: the Law on Amendments to the LTPTA), which was published in the Official Gazette of the Republic of Serbia no. 109/2025 of 4 December 2025.

The Law on Amendments to the LTPTA enters into force on 12 December 2025.

The most significant novelties are presented below.

Elimination of Irregularities in the Use of Tax Incentives

If, during a tax audit, it is determined that the employer does not meet the conditions for tax incentives:

- The Tax Authority issues a decision ordering the employer to pay the tax and contributions that were previously paid from the state budget.
- The employer is not required to submit amended tax returns to correct the irregularities.

Extension of deadline for implementation of debt and overpayment write-offs *ex officio*

The deadline for completing of writing off debts and overpayments on various grounds of termination, which, according to the proposed amendments, the Tax Authority should carry out *ex officio*, is extended until 31 December 2026.

The deadline for completing the procedure, which aims to organize the accounting and other records of the Tax Authority, is extended until the end of 2026 in order to provide additional technical and IT capabilities for the efficient implementation of debt and overpayment write-offs in the coming period.

Additionally, since the efficiency of organizing the Tax Authority's records depends on the quality of relevant information received from the records of original authorities, the additional deadline is intended to ensure more effective cooperation between state authorities, as well as to find ways to provide reliable, accurate, and indisputable data.

Implementation of Write-Offs *ex officio* Without a Decision

In order to streamline the procedure, the write-off in tax accounting of debt and overpayment of amounts up to RSD 100 will be carried out based on a record prepared by the Tax Administration.

Payment of Taxes in Foreign Currency – Deferred Implementation

The implementation of the provision regarding the payment of taxes in foreign currency by non-residents is postponed for one year, so that the starting date for its application is set for 1 January 2027.

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

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