

CONEO

Ideas that pay off.

Monthly Newsletter

November, 2025.

CONEO.RS

1.

NBS TO INTRODUCE DIGITAL ENFORCEMENT SYSTEM ON 1 DECEMBER 2025

The National Bank of Serbia (NBS) has adopted amendments to the Decision on the Manner of Enforced Collection, introducing a fully digital system for processing promissory notes and setting clearer obligations for banks.

Before executing a payment order, banks will be required to verify all legal elements of the promissory note and its registration in the Register of Promissory Notes and Authorisations. Communication between banks and the NBS will be standardised through the SMT 710 electronic message, which will accelerate collection procedures and reduce the risk of errors.

The new system also enables collection through electronic promissory notes, including those issued by guarantors (avalists), exclusively via the Central Register. If the main debtor fails to make payment by 10:00 a.m., the order will automatically be transferred to the guarantor, while the original order is withdrawn.

Creditors will be required to keep records of collections and withdraw unexecuted orders once the debt is settled.

The new rules take effect on 1 December 2025, aiming to enhance efficiency, accuracy, and legal security in the collection of receivables across Serbia's financial system.



2.

WHEN ARE EMPLOYEE MEALS SUBJECT TO TAX IN SERBIA?

Providing meals to employees is a common practice in Serbia—but whether this constitutes a taxable benefit depends on the form in which the meals are provided.

In-kind meals (such as on-site canteens or catering services provided free of charge or below market value) are not taxable, provided they are available to all employees or to specific groups based on objective criteria (e.g. shift work, field work, or similar).

By contrast, cash payments for meals—commonly referred to as the “hot meal allowance” (topli obrok)—are always taxable and treated as part of an employee’s salary, subject to both income tax and social security contributions.

KEY CONSIDERATIONS FOR EMPLOYERS:

- No tax is due on organized meals provided on company premises or through catering contracts, provided that documentation is complete and accurate.
- Cash allowances for meals must be taxed in the same way as wages.
- The Labour Law does not require employers to provide meals—this remains a voluntary benefit.

From a tax efficiency perspective, in-kind meal provision is the preferred approach, as these costs can be recognized as deductible business expenses, provided they are supported by valid contracts and invoices.

3.

THE DIGITAL EURO IS COMING IN 2029

The European Central Bank (ECB) plans to introduce the digital euro by 2029, provided that the European Parliament and the Council of the EU adopt the necessary regulation by 2026.

The goal of the project is to strengthen Europe’s monetary sovereignty and reduce dependence on U.S. payment service providers such as Visa, Mastercard, and PayPal.

Following the research and preparation phases, the project is now entering its technical readiness stage, with pilot transactions expected in 2027.

The implementation cost is estimated at €1.3 billion, with annual operating costs of around €320 million. Transaction amounts will be limited (€500–€3,000) to help protect financial stability.

The digital euro will be available even without an internet connection, offering a high level of privacy and secure token storage directly on users’ devices.

As the share of cash payments continues to decline (just 24% in 2024), the ECB aims to ensure that citizens retain a safe and accessible digital means of payment within the European financial system.



4.

STRENGTHENING EMPLOYMENT AND SOCIAL INCLUSION IN SERBIA THROUGH EU SUPPORT

Serbia's Operational Programme for Employment, Skills, and Social Inclusion 2024–2027 has been allocated €126 million, including €100 million in EU funding and the remainder from national contributions.

Running until 2032, the programme aims to strengthen Serbia's social and economic fabric through targeted investments in:

- Youth employment and workforce development
- Modernisation of schools and vocational training
- Housing solutions for vulnerable groups
- Deinstitutionalisation and integrated social services

This initiative represents a joint commitment of the European Union, national institutions, local governments, and civil society, working together to promote a more inclusive, equitable, and resilient society.

It sets a solid foundation for sustainable growth and a future-ready workforce, supporting Serbia's path toward stronger social cohesion and long-term development.

5.

APR INTRODUCES NEW REGISTRATION FEES EFFECTIVE JANUARY 1, 2026

The Serbian Business Registers Agency (APR) has adopted a new decision adjusting fees for the registration of companies, associations, entrepreneurs, and other business entities. The decision was published in the Official Gazette on 31 October 2025 and will take effect on 1 January 2026.

The registration fee for establishing a company, cooperative, foundation, association, or public enterprise will be RSD 8,000.

Changes to company data, entry of annotations, or branch registration will cost RSD 4,000, with an additional RSD 3,000 charged for each extra item in the same application.

Changing the legal form (e.g. from LLC to joint-stock company) or completing status changes such as mergers or acquisitions will also cost RSD 8,000 per legal entity.

For entities listed in special registers — such as media outlets, travel agencies, or public procurement bidders — registration fees will be RSD 4,000, and changes RSD 2,000.

Bankruptcy registration will cost RSD 12,000, or RSD 6,000 for micro legal entities.

The registration of a sole proprietorship will cost RSD 2,500, while changes to business data or registration of an additional business unit will cost RSD 1,400. Each extra change within the same application will add RSD 700.

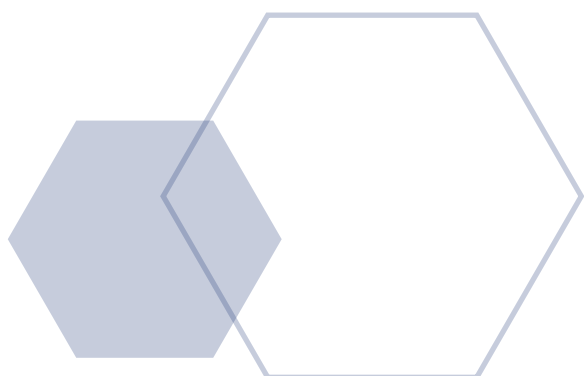
Reservation, transfer, or renewal of a business name will also cost RSD 1,400.

Fees for official documents have been updated to reflect their type and complexity.

Extracts and certified copies of registrar decisions will cost RSD 1,500–2,500, certificates of non-existence of an entity RSD 1,000–1,500, and access to historical data RSD 800 per record.

Certificates of legal succession — often required for status changes — will cost RSD 2,000 for companies and RSD 1,200 for entrepreneurs.

The new pricing structure aims to create a unified and transparent fee system across all APR registers, aligned with current legal regulations and the actual cost of public service provision.



6.

WHEN CAN COMPANIES IN SERBIA BENEFIT FROM A 10-YEAR CORPORATE INCOME TAX EXEMPTION?

Large investors in Serbia may be eligible for a 10-year corporate income tax holiday, but only if strict legal requirements are met.

TO QUALIFY FOR THIS MAJOR TAX INCENTIVE, A COMPANY MUST:

- Invest more than RSD 1 billion in eligible fixed assets
- Employ at least 100 new full-time workers
- Ensure all investments are fully paid and actively in use

The Ministry of Finance has recently clarified that only investments in owned property are eligible for the exemption — improvements to leased premises do not qualify.

Tax relief applies only after all legal conditions have been met and the company begins generating profit.

This interpretation is particularly relevant for large and foreign investors operating in leased facilities.

To take full advantage of the available incentives, comprehensive legal and accounting planning is essential before committing capital.

7.

COURT FEE DEADLINES AND STATUTE OF LIMITATIONS EXTENDED IN SERBIA

Effective 1 November 2025, amendments to the Law on Court Fees introduce several important changes affecting both individuals and legal entities in Serbia.

The statute of limitations for unpaid court fees has been extended from three to five years, giving courts more time to collect outstanding obligations.

Another key change is that the obligation to pay the court fee will no longer arise upon filing a lawsuit, but only after the first hearing, unless the case is resolved earlier through mediation, settlement, or withdrawal.

Additionally, court fees have been increased, with some rising up to five times higher than before. For instance, fees previously set at RSD 3,000 may now reach RSD 15,000.

OTHER NOTABLE UPDATES INCLUDE:

- Clearer rules for fee exemptions and installment payments, now allowing up to six monthly installments instead of three
- Mandatory delivery of payment orders as soon as the fee obligation arises
- Defined payment deadlines for various court motions, including appeals and counterclaims

These amendments aim to improve transparency, efficiency, and predictability in the court fee system, while ensuring more consistent application across all types of legal proceedings.

8.

TAX DEBT WRITE-OFFS FOR CERTAIN INDIVIDUALS AND COMPANIES IN SERBIA

Recent amendments to the Law on Tax Procedure and Tax Administration introduce several important updates for taxpayers – from more efficient enforcement and collection to the write-off of old tax debts.

THE DEBT WRITE-OFF APPLIES TO:

- Individuals registered as deceased by 31 December 2014
- Companies closed through bankruptcy, liquidation, or ex officio deletion
- Entrepreneurs who lost their status before the end of 2014
- Tax liabilities for which absolute limitation occurred before 1 January 2025
- All debts below RSD 100, which will be automatically deleted without the need for a formal decision

IN ADDITION, THE TAX ADMINISTRATION NOW HAS EXTENDED POWERS TO:

- File tax returns on behalf of taxpayers who fail to do so
- Retroactively determine repayment obligations for previously granted tax incentives
- Transfer all old obligations into the regular accounting system by the end of 2026

These amendments aim to streamline the tax system, improve collection efficiency, and ensure clearer records, while also raising important considerations for future tax planning and compliance.

CONEO

Ideas that pay off.

Monthly Newsletter

November, 2025.

CONEO.RS



CONTACT

CONEO – Revizija d.o.o. BEOGRAD

Knez Mihailova 22,
Belgrade, 11000, Serbia

+385 11 3039104

www.coneo.rs

Christian Braunig Managing Partner

[e-mail](#)

Nevenka Petrović Director

[e-mail](#)