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Tax and Legal news

Taxes
Legal
World news
In brief
Did You Know?

Tax and Legal News | June 2026

Taxes

The Financial Administration has published a list of digital postmen

In early June 2026, the Slovak Financial Administration announced the launch of electronic invoicing. It has completed the implementation of the directory service and functionality on the Financial Administration portal, which allows businesses to select a specific delivery service provider, known as a digital postman.

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On the Financial Administration portal, in the 'eFaktúra' section, it has made available a new service entitled **'List of certified delivery service providers and their intermediaries'**, which allows businesses to select a digital postman from the list of certified providers and their intermediaries.

Mandatory electronic invoicing from January 2027

Electronic invoicing is currently voluntary; **however, from 1 January 2027, it will be mandatory** for domestic VAT payers when issuing invoices for the supply of goods and services between businesses (B2B) and between businesses and public authorities (B2G) in Slovakia. The obligation to accept electronic invoices will generally also apply to entities that are not VAT payers, provided they are recipients of invoices from suppliers participating in the electronic invoicing system.

Businesses can already choose from a range of solutions, and during the summer and in the third quarter of 2026, major suppliers of accounting and ERP systems are expected to join the scheme, providing electronic invoicing and digital mail services directly within their own solutions.

It is not worth delaying preparations

The introduction of electronic invoicing will bring more than just a technical change for businesses. It will affect internal processes as well as the configuration of accounting systems. The sooner businesses prepare, the smoother the transition to the new requirements will be. Further information on electronic invoicing, including how KPMG can assist with its implementation in your company, can be found on our website in the Mandatory electronic invoicing section.

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Taxes

Slovakia is incorporating further measures from the ViDA package into the VAT Act

On 27 May 2026, the Slovak Ministry of Finance submitted a draft amendment to the VAT Act for consultation. It introduces significant changes affecting the platform economy and extends the ‘single VAT registration' system. It will affect not only e-commerce and the electric vehicle charging (e-charging) sector, but also other areas of business and various types of supplies of goods and services. This article is the first part of a series dedicated to the upcoming changes in VAT.



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The aim of the amendment to the VAT Act

The draft amendment to the VAT Act focuses primarily on the following objectives:

- the transposition of Articles 2 to 4 of Council Directive (EU) 2025/516, which forms part of the ‘VAT in the Digital Age’ (ViDA) package aimed at modernising VAT rules for the digital age – **introducing amendments to the rules for the platform economy and extending the ‘single VAT registration’ system for VAT**;
- amendment of the **rules concerning the person liable to pay VAT on imports in the context of distance sales of goods imported from third countries**, where the goods are subject to the special Import One-Stop Shop (IOSS), and the abolition of the special arrangements for the declaration and payment of VAT on the importation of goods (transposition of the related Council Directive (EU) 2025/1539).

Planned changes resulting primarily from the transposition of ViDA

The proposal includes, amongst other things, the following changes, which will come into force in several phases – on the date of publication of the legislation, from 2027 (primarily technical amendments) and from 1 July 2028 (platform economy and extension of the single VAT registration system):

On the date of publication of the legislation:

- clarification that the value of occasional property lettings is not included in the ‘turnover’ for registration purposes;

As from 1 January 2027:

- adoption of several technical legislative amendments relating to users of the **One Stop Shop** (OSS) and **Import One Stop Shop** (IOSS) schemes, and to operators of platforms and online marketplaces who facilitate the delivery made by original suppliers of consignments of goods imported from third countries into the EU;
- **the creation of a legal fiction for a transitional period from 1 January 2027 to 30 June 2028**, under which selected supplies of goods (e.g. gas, electricity, heating, cooling) to certain persons – generally final consumers (‘B2C’ supplies) – will, for the purposes of applying the special ‘one-stop-shop’ (OSS, Union scheme) scheme, be treated as distance sales of goods within the EU if the supplier is not established in the EU Member State of supply;

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As from 1 July 2028:

- **determination of the place of supply of a service consisting in facilitating the supply of a service to a person other than a taxable person through the use of various electronic communication interfaces** – the place of supply is the same as that of the underlying service whose supply is being facilitated;
- **the taxation of platforms in the short-term accommodation and passenger road transport sectors under the 'deemed supplier' regime**, whereby the platform is treated as the person liable for VAT, except where the VAT is charged by the actual provider of such a service; the legal fiction of the deemed supplier does not apply even where, in the provision of the services in question within the EU, special TOMS rules apply;
- **the adoption of extension of the so-called 'Single VAT Registration' system** – 'SVR', which aims to eliminate the need for multiple VAT registrations in different EU Member States and enable businesses to fulfil most of their VAT administrative obligations through a single point of contact in their country of establishment – the reform will bring about the following main changes:
    - the scope of the 'one-stop-shop' ('OSS') scheme will be extended to new types of supplies of goods and services to certain persons – generally final consumers within the EU; this will include, amongst other things:
        - the supply of goods with installation and assembly,
        - the supply of goods on board ships, aircraft and trains during passenger transport within the EU,
        - the supply of gas, electricity, heating and cooling,
        - the supply of goods without dispatch or transport, as well as the supply of goods where transport begins and ends in the same Member State;
        - other supplies;
        - Similarly, subsequent transactions involving goods moved from one EU Member State to another will also be subject to specific rules;
    - **a new OSS scheme will be introduced for the movement of own goods for business purposes to another EU Member State**, thanks to which traders will no longer have to apply for VAT registration in the relevant country or pay VAT on the acquisition of goods – they will fulfil the related obligations via a single point of contact in their country of establishment;
    - in this context, the current **call-off stock regime** will also be phased out;
    - **under the new rules, the reverse charge mechanism will also apply in cases where supplies of goods or services made in Slovakia are supplied by a foreign person** (according to the explanatory memorandum, without a Slovak VAT identification number), to another foreign person who has been assigned a VAT identification number in Slovakia under Section 5 or is registered for VAT under Section 7 of the Slovak VAT Act;
- **amendment of the rules governing the determination of the person liable to pay VAT on imports**, based on the transposition of Council Directive (EU) 2025/1539, with the aim of strengthening the special scheme for distance sales of goods imported from third countries ('Import One Stop Shop' – 'IOSS'):
    - where this scheme has not been applied to goods subject to the IOSS, liability for payment of the VAT shall pass to suppliers and platforms acting as deemed suppliers;
    - suppliers and 'deemed suppliers' will be required to appoint a tax representative in the EU Member State of importation, who will be liable for the VAT on importation where the supplier or 'deemed supplier' is not established in the EU but in a third country, with which the EU has not concluded a mutual assistance agreement;
    - at the same time, the application of the special rules for the declaration and payment of VAT on the importation of goods will be discontinued.

The draft amendment is currently undergoing a consultation process. We will keep you informed of further developments in the legislative process.

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Taxes

Draft amendment to the VAT Act: focus on preventing abuse of the VAT system

On 27 May 2026, the Slovak Ministry of Finance submitted a draft amendment to the VAT Act for consultation. A key part of the amendment comprises measures to combat VAT evasion and abuse of the VAT system. This is the second part of a series dedicated to the upcoming changes in VAT.



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Planned Measures to Prevent Abuse of the VAT System

In view of the above objectives, the following measures are proposed to come into force on 1 January 2027:

- **expanding the range of situations in which the tax authority may, of its own accord, cancel a VAT payer's registration** – this will mainly concern cases where the taxpayer:
  - repeatedly, over a specified period, issues an invoice for the supply of goods or services that did not in fact take place, or
  - claims a VAT deduction on the basis of such a fictitious invoice;
- **introduction of a legal presumption of cessation of economic activity in respect of those VAT payers** who, for example:
  - fail to notify the place where their business activities are carried out within the specified time limit, even after being requested to do so,
  - provide only a so-called correspondence address, or
  - submit VAT returns for a certain period in which they do not provide any details of taxable transactions or input VAT;
- extending the newly expanded **rules on deregistration for VAT purposes to persons registered** under Sections 7 and 7a of the VAT Act;
- **introducing the option, in specified cases, to lodge an appeal with suspensive effect against a decision to deregister,** in which it will be possible to demonstrate that business activities are being carried out in a different manner or by other means;
- **extending the deadline for a decision on VAT registration to 60 days in the case of voluntary registrations** where the tax office has doubts as to whether the applicant is in fact a taxable person or whether the information provided in the application and accompanying documents is complete, correct and truthful.

Procedural changes regarding the termination of entitlement for repayment of VAT excess deduction

From **1 January 2027**, a taxpayer will have the option to lodge an objection against a **notice of termination of the entitlement for repayment of VAT excess deduction resulting from a failure to allow a tax audit to be carried out within 3 months** of the date of its commencement, this will be subjected to the tax authorities' decision. If the

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objection is upheld, the taxpayer's entitlement to a refund of the excess VAT deduction will not lapse; no further appeal may be lodged against the decision on the objection.

Related legislative amendments

The Ministry of Finance of the Slovak Republic is also proposing related amendments to the following regulations:

- **Act No. 251/2024 Coll. on the Tax on Sweetened Non-Alcoholic Beverages** ('the SNB Tax Act'), with the aim to:
    - **prevent the circumvention of tax obligations** through a misleading labelling of sweetened non-alcoholic beverages;
    - **introduce** – following the amendment to the VAT Act, which introduces the right to lodge an objection against a notice of termination of the entitlement to repay a VAT excess deduction – similar legal provisions into the SNB Act, given the similar nature of both taxes.
- **Act No. 563/2009 Coll. on Tax Administration** (Tax Code) – this will involve a partial procedural amendment directly linked to the introduction of the possibility to lodge an objection against a notification of termination of the entitlement to a repayment of excess VAT and tax on sweetened non-alcoholic beverages.

The draft amendment is currently undergoing evaluation following the consultation process. We will keep you informed of further developments in the legislative process.

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Taxes

Changes to mandatory electronic invoicing and digital data reporting

On 27 May 2026, the Ministry of Finance of the Slovak Republic submitted a draft amendment to the VAT Act for consultation. The proposed amendments will also affect the areas of mandatory electronic invoicing and mandatory digital reporting of invoice data. This is the third part of a series dedicated to the upcoming changes in VAT.



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The draft amendment clarifies and amends the rules based on experience gained from the ongoing technical implementation in Slovakia and other EU Member States. The changes will be as follows:

From 1 January 2027:

- **waiver of the general obligation to receive electronic invoices via a delivery service for taxable persons who are not VAT payers**, in respect of invoices for the supply of goods or services to be received in connection with provision of VAT-exempt property lettings, provided that such property is not classified as business assets under the Slovak Income Tax Act – this exemption does not apply if the taxable person is required to be able to receive electronic invoices in relation to other transactions they carry out;
- **waiver of the obligation to report data from received electronic invoices sent via a delivery service** – the reason being that the exchange of e-invoices and the reporting of data are fully automated, and the data reported to the tax authorities by the supplier are essentially identical to the data that the customer would report;
- **a proposal regarding the reporting of data from corrected invoices** – that all unchanged data from the original invoice and the corrected data (and not just the data that have changed) should be reported; the serial number of the original invoice will also be reported;
- **the introduction of a so-called 'grace period' for the first three months following the transition to electronic invoicing** – during which certain breaches of obligations will not be penalised, such as the late or incorrect issuance of an electronic invoice or the failure to report the required data to the specified extent or within the prescribed time limit;

From 1 July 2030:

- **legislative and technical amendments clarifying the circumstances in which a simplified invoice cannot be issued** – the provision will now refer generally to the definition of a simplified invoice without distinguishing between its various forms;
- a **proposal that, where the deadline for issuing an electronic invoice or for reporting invoice data** falls on a Saturday, Sunday or public holiday, the **last day of the deadline shall be the next working day**, in accordance with the Tax Code.

(Note: the rules subject to the proposed amendment are not included in the wording of the Act in force until 30 June 2030; the draft amendment therefore does not contain changes for the period up to the end of June 2030).

The draft amendment is currently undergoing evaluation following the consultation process. We will keep you informed of

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further developments in the legislative process.

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Taxes

What will change for self-employed contributions from 1 July 2026?

The first payment of micro-contributions by self-employed persons is approaching. An amendment to the Social Insurance Act, passed at the last minute, eases the rules for low-income self-employed persons. Thanks to this amendment, some self-employed persons generating low income will be exempt from paying these contributions.

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Without this amendment, even self-employed person **with incomes lower** than **the amount of these contributions themselves** would have had to pay the minimum monthly contributions of EUR 131.34, which in practice would have led to a disproportionate financial burden.

Who will be exempt from paying contributions

Under the approved amendment, self-employed persons who, in the previous year, **did not earn income** in accordance with Section 6(1) and (2) of Act No. 595/2003 Coll. on Income Tax in excess of the statutory threshold **will not be subject to compulsory sickness and pension insurance**.

For the year 2026, the income earned in 2025 will be taken into account. **Self-employed persons will be required to pay** the minimum **contributions only** if their annual income (before deducting their expenses) **exceeds EUR 2,876.90**, which represents a monthly income of approximately EUR 239.74. This amount will increase slightly each year.

Effective date of the changes

This amendment **comes into force on 1 July 2026**, i.e. at the same time as the rules on minimum contributions for self-employed persons under the original amendment begin to apply in practice. **The key elements of the amendment effective from 1 January 2026 remain in place**. The legislation separately addresses the transitional period for new sole traders, as well as specific rules for those renewing their business licences.

Although the amendment primarily helps sole traders with monthly income of up to EUR 239.74, it does not resolve the situation for all small businesses, such as those run alongside a main job. Self-employed people with incomes only slightly above the specified threshold may still find themselves in a situation where, due to the mandatory minimum contributions, their business is no longer profitable.

This is one of the reasons why many small business owners are closing down their businesses as at 30 June.

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Legal

Amendment to the AML Act introduces new obligations for obliged entities and entrepreneurs

On 14 April 2026, an amendment to the Act on Protection against the Legalisation of Proceeds of Criminal Activity and on Protection against the Financing of Terrorism was adopted. The amendment entered into force on 1 June 2026, while certain provisions, in particular in the area of the Register of Legal Entities and the accessibility of data on ultimate beneficial owners, will only enter into force on 10 July 2026.



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The amendment also introduces changes to the Trade Licensing Act and other related legislation. It is a significant reform that will affect the functioning of obliged entities as well as entrepreneurs in selected sectors. Below is an overview of the most important changes and their key practical implications.

Verification of Information on the Client's Ultimate Beneficial Owners

When carrying out customer due diligence, obliged entities will now be required in all cases to verify information relating to the identification of the client's ultimate beneficial owners from reliable sources. At the same time, the amendment explicitly provides that obliged entities may not rely solely on the Register of Legal Entities.

Before the amendment entered into force, the obligation to verify such information from another reliable source arose only where, on the basis of a risk assessment, there was a higher risk of money laundering or terrorist financing.

Extension of the Definition of Ultimate Beneficial Owner

The amendment **extends the definition of ultimate beneficial owners in relation to asset associations and foreign trusts**. In the case of asset associations, the circle of persons considered to be ultimate beneficial owners is broadened in particular to include persons exercising actual control over the assets of the association through direct or indirect ownership or by other means. In the case of foreign trusts, the status of future beneficiaries and the circle of persons who benefit from the establishment or operation of the trust are specified in more detail.

Possibility Not to Continue with Standard Customer Due Diligence

An obliged entity will have the option not to continue with standard customer due diligence in relation to a client if it suspects that the client is preparing or conducting an unusual business transaction and there are grounds to believe that further application of standard customer due diligence measures could reveal this suspicion to the client. In such a case, the obliged entity must proceed in accordance with the provisions of the AML Act on reporting an unusual business transaction.

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In the report, it must also set out the circumstances and reasons for not carrying out standard customer due diligence to an extent that allows an assessment of the appropriateness of this approach, and indicate the scope of standard customer due diligence that was not performed.

Extension of Identification Obligations

Following the entry into force of the amendment, the identification obligations in respect of legal entities and asset associations have been extended. Obliged entities will also be required to obtain the names and surnames of the members of their governing bodies. An obliged entity will therefore no longer identify only the legal entity itself and the persons authorised to act on its behalf, but also the persons forming its management structure.

Reporting Unusual Business Transactions and Registration in the “goAML” System

Reports of unusual business transactions must now be submitted via the information system of the Police Force designated for the receipt and analysis of reports (known in practice as the Financial Intelligence Unit’s “goAML” system). If this system is not operational, the report must be submitted in another electronic form that ensures the confidentiality of the information.

Registration in this system is mandatory. **Obliged entities that held such status as at 1 June 2026 must register by 30 November 2026**. Entities that acquire the status of obliged entity later must register within **30 days** from the date on which they acquire this status.

Establishment of the Register of Foreign Trusts

The amendment **establishes a Register of Foreign Trusts as an information system of public administration**. The Ministry of the Interior of the Slovak Republic will be the administrator and operator of the register, while registration and changes to registered data will be carried out by district offices in the seats of regions.

A foreign trust must be entered in the register within the statutory deadlines if its trustee:

- has a permanent residence, other residence, place of business or registered office in the Slovak Republic,
- intends to establish, in the name of the trust, a business relationship with an obliged entity, or
- intends to acquire, for the benefit of the trust, real estate located in the territory of the Slovak Republic.

This obligation does not apply if the trust is registered in an equivalent register in another Member State.

Record-Keeping of Assets Managed by Foreign Trusts

A trustee of a foreign trust who has a permanent residence, other residence, place of business or registered office in the territory of the Slovak Republic will be **obliged to keep and continuously update records on the assets under management for a period of at least five years**. This is a new obligation for trustees of foreign trusts with a nexus to the territory of the Slovak Republic, aimed at ensuring the availability of information on the assets under management.

Requirement of Integrity of Ultimate Beneficial Owners for Selected Trades

The amendment to the Trade Licensing Act introduces a specific impediment to carrying on **selected trades by legal entities whose ultimate beneficial owner is not of good repute** (i.e. does not meet the requirement of integrity).

This applies to the following trades:

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a) intermediation of the sale, lease and purchase of real estate (real estate agency activities),

b) bookkeeping,

c) trades under which a person may be provided for business companies to act as a statutory body, member of a statutory body, a person directly subordinate to a statutory body or its member, a commercial proxy, head of an organisational unit of a branch or other organisational unit of an enterprise, liquidator, or a person in a similar position for other legal entities,

d) trades under which a registered office, registered address, service address and other related services may be provided for legal entities and special-purpose asset associations, irrespective of their legal personality, that manage and distribute financial resources.

Legal entities that ob**tained a trade licence for these activities by 31 May 2026 are required to bring their legal relationships into conformity with this rule by 30 September 2026**. In practice, this will mainly mean verifying the integrity of ultimate beneficial owners and, where necessary, adjusting the ownership and management structure, or terminating the carrying on of the relevant trade if the integrity requirement is not met.

Register of Legal Entities and Accessibility of Data on Ultimate Beneficial Owners

The administration of the Register of Legal Entities, Entrepreneurs and Public Authorities will be transferred from the Statistical Office of the Slovak Republic to the **Ministry of the Interior of the Slovak Republic**. At the same time, the regime governing access to data on ultimate beneficial owners will change. These data **will no longer be publicly accessible**; access will be restricted to entities expressly defined by law. Other persons will only be granted access if they demonstrate a legitimate interest in accordance with the Act on the Register of Legal Entities, Entrepreneurs and Public Authorities. Entrepreneurs should therefore expect that obtaining information on the ultimate beneficial owners of other entities may become more administratively burdensome.

Changes in the Area of Implementation of International Sanctions

The amendment also **affects the legal framework for the implementation of international sanctions**. It extends the possibility to impose forfeiture of property in relation to certain administrative offences linked to the application of international sanctions, and adjusts the competence of authorities and implementing entities, as well as the rules on remedies.

For breaches of obligations under the AML Act, **obliged entities may be subject to significant penalties**, up to **double the amount of the unlawful benefit obtained or EUR 1,000,000** (whichever is higher), and in the case of **banks and financial institutions up to EUR 5,000,000** or **10% of total annual turnover**.

In practice, obliged entities should therefore appropriately adjust their internal procedures and documentation, set up processes to reflect the new obligations, and ensure that responsible employees understand these changes and are able to implement them in their day-to-day work.

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Legal

New Commercial Register Act brings administrative changes

The new Act on the Commercial Register (“Commercial Register”) introduces changes intended to simplify administration both when establishing new companies and when making changes in existing ones. Below is an overview of the most significant changes.



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Abolition of the two-phase registration of free trades

The **process of establishing** a company **will be simplified and shortened**. Currently, when a new company is being incorporated and its business activity is considered as an free (unregulated) trade, this trade must first be notified to the **Trade Register**.

For the purposes **of issuing a certificate for a free trade, it is not necessary to prove any professional or qualification competence**, unlike in the case of regulated trades. Only after the trade licence has been issued can an application be filed for the registration of the company in the Commercial Register.

For free trades, notification of the trade is therefore an administratively redundant step. Going forward, free trades **will be notified simultaneously with the registration of a new company in the Commercial Register**. By eliminating the two-phase process, the establishment of a company becomes simpler and faster.

Interconnection of registers

Public administration is undergoing a process of digitalisation, and communication with state authorities is moving online. State authorities are now able to efficiently search and verify required data in other records administered by the state. The Commercial Register is no exception and, once the new Act becomes effective, its **interconnection with other registers will increase**.

In practice, this will simplify procedures for entrepreneurs. Currently, certain data required for incorporation and corporate changes must be evidenced by various documents. If such documents are not available or cannot be obtained by the entrepreneur, an affidavit is submitted to the Commercial Register instead.

Under the new rules, **so-called reference registers will be mandatorily interconnected**, which will save entrepreneurs time and administrative effort when submitting documents that the state can obtain from interconnected registers. The registry court or registrar **will be obliged to verify data** that follow from other registers, such as the Register of Public Sector Partners.

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Legal binding effect of registered data

As before, data entered in the Commercial Register will remain publicly accessible. Newly, however, data registered and published in this way will be **legally binding**. Until now, information commonly available in the Commercial Register was of a rather informative nature, and a standard extract was required for legal acts. Under the new rules, data recorded in the Commercial Register **will automatically be legally binding and usable for legal acts**.

In business transactions, entrepreneurs will therefore no longer be required by law to submit extracts from the Commercial Register, although the option to obtain such an extract will remain. It is questionable how the business community, especially large corporations such as banks, which often have stricter internal requirements than those imposed by law, will react. It is possible that they will continue to require standard Commercial Register extracts for use in legal acts.

Increase in fines

The registration of changes and new facts in the Commercial Register is associated with liability, primarily on the part of individuals authorised to act on behalf of the entrepreneur, typically statutory representatives. One of the basic obligations i**s to submit a motion to register a change in due time, i.e. within 30 days from the date on which the change occurred** (for example, within 30 days from the adoption of a shareholder's decision).

The maximum amount of the fine for breach of obligations will increase from the current EUR 3,310 to **EUR 4,000**. Only registry courts have the right to impose fines. Registrars (notaries), however, are obliged to notify the court of facts that may give rise to the imposition of fines. In practice, such fines have been imposed only very rarely, and it remains to be seen whether the approach to imposing fines will change after the amendment of the law.

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How to manage the risk of a permanent establishment when working remotely

The second part of the KPMG survey focuses on how the risk of establishing a permanent establishment manifests itself in practice across 63 jurisdictions.

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As we reported in the previous article, KPMG conducted a two-part survey **amongst member countries on how 63 jurisdictions apply the 2025 Commentary on the OECD Model Tax Convention in relation to cross-border remote working**. The findings show that the concept of 'working from anywhere' creates complex situations regarding the establishment of a permanent establishment. The second instalment therefore focuses on specific scenarios and their practical tax implications.

Working from home abroad

Only a small number of countries have clear rules on the establishment of a permanent establishment due to home working. Most rely on the OECD commentary and general principles. The assessment focuses in particular on:

- whether the company actually serves clients or other local entities in the country in question,
- whether this is a long-term, regular arrangement, rather than just occasional work from home,
- the level of responsibility and decision-making authority held by the employee,
- whether remote working is a personal choice or is actively facilitated/organised by the company,
- whether the company actually makes a home workspace available (reimbursement of costs, listing of the address in internal systems, work meetings at the employee's home).

It is therefore the actual activities and their significance for the business that are decisive, not the address itself.

Dependent agent

Most countries recognise the concept of a **'permanent establishment through an agency'**, but the specific rules vary. A risk arises in particular if a person in a given country:

- regularly negotiates or concludes contracts on behalf of a foreign company,
- has a significant influence on the conclusion of a transaction,
- acts more as part of the company's organisational structure than as a truly independent intermediary.

Digital nomads

Special visas or residence schemes for digital nomads already exist in several countries, but for the most part they only address immigration and residence issues, not the establishment of a permanent establishment. Only in exceptional cases (e.g. under certain rules in Malta) is it explicitly stated that, provided the conditions are met, **a permanent establishment**

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will not be established. In general, therefore, the standard tax rules apply.

Implications for businesses

Around a third of respondents perceive that tax authorities are paying greater attention to the risk of a permanent establishment arising from remote working, particularly in the case of:

- **senior and decision-making positions,**
- **long-term and planned home office arrangements abroad.**

If a permanent establishment is established, **the company must, as a rule**:

- register for corporation tax and file tax returns,
- fulfil its obligations regarding payroll and social security contributions as a local employer,
- allocate an appropriate share of profits to the permanent establishment in accordance with the arm's length principle,
- and often deal with VAT and local accounting matters.

Incorrect assessment **may result in fines, penalties, interest, and in serious case**s, criminal liability, back-payment of wages and social security contributions, and an increased number of audits.

Tax residence of a company

Most countries do not assess a company's tax residence solely on the basis of its place of incorporation, but also on the basis of where:

- day-to-day management takes place,
- key strategic decisions are taken,
- senior managers are physically and for tax purposes resident, and from where they attend meetings.

Formal 'day counts' are the exception – what matters is where the company's actual place of management is.

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In brief

Do not forget to file the income tax returns

The deadline for filing the income tax returns with extended deadline by three months and paying the respective tax is June 30, 2026.

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Taxpayers with a taxable period equal to the calendar year who have announced **an extension of the deadline for filing income tax returns by three calendar months** must meet their statutory obligation **by June 30, 2026**. The corresponding tax must also be paid by this date.

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In brief

One sentence summary | June 2026

Last month’s tax and legal news in brief.

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- The **minimum subsistence level will rise to EUR 295.22 from 1 July 2026**. This is a key figure from which the state derives dozens of other figures, including the tax-free allowance per taxpayer and the obligation to file a tax return. The tax-free allowance per taxpayer for **2027** will be increased to **EUR 6,199.62 per year**. The obligation for individuals to file a tax return for the following year will be linked to half of this amount.
- Companies belonging to multinational groups will have to **file their first tax return for the 2024 top-up tax** (including tax payment) **by 30 June 2026** at the latest. This obligation applies to every affected Slovak company within the group, even if the group applies the safe harbour regime and the tax return is zero.
- The European Central Bank **is raising** interest rates. From 17 June 2026, the interest rate on main refinancing operations has risen to **2.40 %**, the interest rate on overnight refinancing operations to **2.65 %** and the interest rate on overnight sterilisation operations to **2.25 %**.
- The tax amnesty is only available **until 30 June 2026,** during which time taxpayers may **voluntarily pay any outstanding tax liabilities or submit (supplementary) tax returns**, thereby avoiding penalties and interest for periods up to 30 September 2025. After this date, the tax authority will once again impose penalties in full, and the tax amnesty will no longer apply.

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Legal

New law on equal pay for men and women passed

On 15 April 2026, the National Council of the Slovak Republic approved the law on equal pay for men and women for equal work or work of equal value by a constitutional majority – 123 of the 147 members of parliament present voted in favour of the bill.



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The Act transposes the EU Directive on pay transparency and **entered into force on 7 June 2026**.

Its aim is to strengthen the application of the principle of equal pay and to increase transparency in remuneration. According to the approved version of the Act, the following rights and obligations are introduced in particular:

- a ban on asking job applicants about **their previous earnings**;
- an obligation on employers **to introduce a remuneration structure** based on criteria that must be objective and non-discriminatory, by 31 July 2026;
- **the right of an employee to information** about their own pay and the average level of pay (or pay band) in the same job category, broken down by gender;
- the employer's obligation **to report pay gaps** to the Ministry of Labour, Social Affairs and Family of the Slovak Republic, depending on the size of the employer;
- if the report reveals **a difference in the average pay of men and women of at least 5%** and this cannot be justified by objective criteria not based on discrimination, the employer must take measures to eliminate it;
- **prohibition on confidentiality regarding pay** – agreed clauses preventing an employee from discussing their pay are prohibited and invalid;
- **extended right to compensation** and a **shift in the burden of proof** to the employer if they have failed to fulfil their legal obligations.

Penalties are also being tightened. The originally proposed fines ranging from EUR 500 to EUR 4,000 for failure to comply with the reporting obligation to the Ministry of Labour are increased to **EUR 4,000 to EUR 8,000** (following the expiry of an additional grace period), with the amount depending on the severity, duration, consequences and frequency of the breach. This brings the fines into line with penalties for illegal employment.

You can find out more about pay transparency and its practical implications for employers and employees in our previous article.

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Cyprus tightens rules on payments to low-tax jurisdictions

From 1 January 2026, Cyprus is introducing new anti-abuse measures concerning payments of interest, dividends and royalties to low-tax and non-cooperative jurisdictions, which were adopted on the basis of three decrees published on 13 March 2026. The aim is to limit structures without genuine economic substance that serve primarily for tax optimisation.



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When does the burden of proof arise?

If a Cypriot company pays interest, dividends or royalties to a related foreign company, **does not apply withholding tax** and at the same time **claims** these payments **as a tax expense**, it will have to be able to prove that the recipient has genuine 'substance'.

What is considered to be genuine substance?

In practice, this means providing evidence of, for example:

- an independent director,
- local decision-making managers,
- an office, staff and local expenses,
- actual ownership of the income (beneficial owner).

If the recipient fails to meet at least **two of these conditions**, the payments will be treated as if **they were subject to withholding tax**.

Exceptions and penalties

The rules provide for exceptions – for example, for payments to residents **of Cyprus, the EU or the EEA**, to groups subject to **the 15% minimum tax (Pillar Two)**, or for structures with clear commercial reasons. Companies must retain the relevant documentation **for six years**, include selected information in their tax returns, and face fines ranging **from EUR 2,000 to EUR 10,000** for late submission of documents.

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Did You Know?

Did you know a state register of accommodation providers is being prepared to improve tax collection?

Slovakia is preparing a major change for everyone who offers short term rentals of flats, houses or rooms – for example via Airbnb, Booking.com or other platforms. The government has approved a draft law that will introduce a state register of accommodation providers, called e Visitor, from 2027. The aim is to make the market more transparent, reduce tax evasion and tighten the rules, especially for short term rentals mediated through online platforms.



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Who will be affected by the new rules

Everyone who provides short-term accommodation for less than one year will have to register, including:

- ordinary people who rent out a flat or room alongside their main job,
- sole traders and companies operating in tourism,
- smaller as well as larger accommodation facilities.

Without registration and an assigned registration number, it will not be possible to legally offer accommodation through online platforms.

How the e-Visitor register will work

Before hosting the first guest, the host will have to:

- register themselves as a host,
- register each accommodation unit (flat, house, room),
- obtain a unique registration number.

If any data changes (e.g. the rental ends, the owner changes), the host will be obliged to report this within **30 days**. The register will be managed by the Ministry of Tourism and Sport of the Slovak Republic. Some data will be public (e.g. the registration number), while more detailed data will be accessible only to authorities – the tax administration, police, statistical office and municipalities.

What platforms like Airbnb and Booking will have to do

Online platforms will face new obligations:

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- require a registration number for every listing,
- check whether the number is valid,
- remove listings without a registration number or with an invalid number,
- regularly send the state data on the number of overnight stays and the results of their checks.

This will give the state, for the first time, an accurate overview of the real number of overnight stays and income from short-term rentals.

Penalties and impact on ordinary hosts

For breaching the rules, the following fines may be imposed:

- **individuals (non-entrepreneurs)**: from EUR 100 to 1,000 EUR,
- **individuals – entrepreneurs** and **legal entities**: from EUR 1,000 to 3,000 EUR,
- **platforms:** from EUR 3,000 to 30,000 EUR.

The law is expected to take effect on **1 January 2027**, with a short transitional period for existing hosts to complete their registration.

From a tax perspective, the register is intended to help reduce undeclared income from short-term accommodation and improve tax collection. It focuses mainly on rentals of flats, houses and rooms via online platforms, which have so far often operated outside full state control.

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World news

Automatic exchange of information under Pillar Two: updated list of GIR MCAA signatories

The Organisation for Economic Co-operation and Development (OECD) has published an updated list of jurisdictions that have signed the Multilateral Competent Authority Agreement on the Exchange of GloBE Information (GIR MCAA) under Pillar Two, which sets out the conditions for the automatic exchange of GloBE Information Return (GIR).



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On 15 April 2026, the OECD updated the **list of jurisdictions** that have signed the GIR MCAA in connection with the exchange of information under Pillar Two. According to the latest overview, the list currently includes **31 jurisdictions**. The updated list is available on the OECD website.

The GIR MCAA is a **key tool for the implementation of the global minimum tax**, as it enables the automatic exchange of GloBE Information Return data between tax administrations of signatory jurisdictions. The breadth of the network of signatories is important for multinational groups when designing their Pillar Two reporting and compliance strategy, in particular for:

- determining the jurisdiction in which the GIR will be filed (the "filing entity"),
- assessing whether all relevant countries in which the group operates are covered by automatic exchange,
- identifying any additional local notification or reporting requirements in non-signatory jurisdictions.

Certain EU Member States have not yet signed the GIR MCAA and have also **not transposed directive DAC 9** into their domestic legislation. This includes, in particular, Bulgaria, Cyprus, the Czech Republic and Malta.

With **June 2026** approaching – when groups **will be filing the first-ever GIR for 2024,** benefitting from an extended filing deadline of 18 months – it is crucial for in-scope groups to ensure they have clarity on where the GIR will be filed, how data will be collected and which tax administrations will receive the information through automatic exchange.

Recommendation for clients

We recommend that clients:

- review the current list of GIR MCAA signatories and compare it with the countries in which their group operates,
- adjust their internal Pillar Two processes accordingly (including determining the GIR "filing entity"),
- verify whether any additional local requirements may arise in non-signatory jurisdictions.

If you need advice on Pillar Two or assistance with performing the calculations and preparing the required filings, we will be happy to help.

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