

12 COUNTRIES. 12 TAX SYSTEMS.

The year 2024 brings changes in the areas of taxes, duties and social contributions in all CEE and SEE countries. This special newsletter covers essential changes effective as of 2024.

TPA offers an overview of the most important tax innovations of 2024.



Albania
Austria
Bulgaria
Croatia
Czech Republic
Hungary

Montenegro
Poland
Romania
Slovakia
Serbia
Slovenia

Bulgarien

General Tax Information

Following a turbulent 2022 from a political perspective, Bulgaria has had a permanent government as of the summer of 2023. Despite being potentially unstable the Bulgarian Parliament has restarted its legislative activity of which some is tax related.

These tax changes are to a major extent related to the fine tuning of current regulations, which is in many cases related to established non-compliances with the EU regulations.

Despite the political speculations, currently there are no serious indications for drastic changes in the general tax framework of the country. The corporate income tax and the personal income tax rates are expected to remain at their current level of 10% flat.

However, the current government has adopted certain measures with the aim of putting pressure on the businesses with regard to:

- Tax collection – such as implementing additional quarterly reporting rules for companies showing cash-in-hands amounts, receivable from shareholders, managers, and employees (incl. loans) of over BGN 50 000 (EUR 25 600) in their balance sheets
- Strengthening control over the movement of goods with high fiscal risk (e.g. sugar, meat, milk, oils, etc.) – the companies shall report each movement/transport of such goods on the revenue agency online platform and obtain a unique identification number for each movement for control purposes. This applies to transports between Bulgaria and EU states, imports or exports from Bulgaria and internal transports within the territory of Bulgaria.

The social security contributions for 2024 currently remain at the levels of 2023 – a total of 32.7% of the gross income distributed at a ratio of about 40/60 for employee/employer. The maximum social insurance base (ceiling) for 2024 is BGN 3 750.

Corporate Income Tax

The deadline for the filing of yearly CIT return for 2023 remains unchanged in 2024, namely between 1 March to 30 June 2024. The deadline for the filing of the annual financial statements for 2023 is 30 September 2024.

Personal Income Tax

The term for the filing of yearly personal tax return remains unchanged for 2024. This term is between 1 January and 30 April of the following year.

The statutory minimum salary as of 01.01.2024 was increased from BGN 780 (EUR 399) to BGN 933 (EUR 477). According to recent legislative changes the statutory minimum salary for each subsequent year shall be 50% of the average gross salary for a 12 month period covering the second half of the previous year and the first half of the current year. The average gross salary shall be determined by 1 September of the current calendar year.

VAT

An important change in the VAT Act is the option provided to companies acting as supplier to adjust their tax base with the amounts of uncollectable receivable by issuing a credit note against the debtor. These adjustments are subject to several preconditions, but this is definitely a legislative step in the right direction which implements the basic principle of neutrality of the VAT in situations of non-collectible receivable.