
Pocket Tax Book 2016

A Practical Guide
to the Slovak
Tax System



This booklet is based on the tax law as it stands on 1 January 2016. It is intended to provide a general guide and is, therefore, in a condensed format. It should not be regarded as a basis for ascertaining tax liability in specific circumstances. Professional advice should always be taken before acting on any information in the booklet.

Dear Friends and Business Partners,



I am pleased that once again another issue of our annual Pocket Tax Book is available to you. It has been prepared with the aim of providing a brief overview of

current tax laws. In our guide, you will find the most important information from the tax laws, including amendments relating to 2016.

The OECD action plan on BEPS and the fight against tax evasion are currently the most important topics in the tax world. In 2016, the No. 1 tax topic will be the application of the OECD recommendations. Each country will have to decide how to respond to these recommendations, either by changes to international treaties or changes to national legislation. A coordinated approach of legislators has been reflected in the growing cooperation between the

tax authorities. Recently, joint efforts of the Czech and Slovak Ministry of Finance is an example, particularly regarding the fight against VAT fraud and the joint efforts of tax and customs administrations in the V4 countries.

This change to the tax environment due to the BEPS package will undoubtedly affect all businesses, not only multinationals, which will face major changes in the tax field. Given the increasingly intensifying cooperation between legislators and the tax administration, our team of specialised tax advisors who are part of the international network of PwC firms, represents the right mix of local and global knowledge, experience and contacts to assist you in finding your direction and helping you survive in this turbulent environment.

A handwritten signature in blue ink that reads 'Christiana Serugová'.

Christiana Serugová
Partner, Tax Leader, PwC

Contents

Individuals	8
Personal Income Tax	8
General Principles	8
Tax Residence	8
<i>Slovak Tax Residents</i>	8
<i>Slovak Tax Non-Residents</i>	8
Personal Income Tax Base and Tax Losses	9
Tax Allowances	9
Tax Registration	10
Tax Returns	11
Donations	11
Penalties	11
Health Insurance and Social Insurance	12
Health Insurance	12
Social Insurance	13
<i>Overview of Health Insurance and Social Security Contributions</i>	13
Companies	15
Corporate Income Tax	15
Entities Liable to Corporate Income Tax	15
Tax Rate	15
Minimum Corporate Tax	15
Tax Base	15
Not Subject to Tax	16
Income Exempt from Taxation	16
Tax-Deductible Items	16

Donations	17
Dividends	17
Interest	17
Foreign Exchange Differences	17
Tax Losses	17
Depreciation	18
Business Combinations	19
Capital Gains and Securities	19
Tax Period	20
Filing	20
Amended Tax Return	20
Payment	20
Fines and Penalties	21
Transfer Pricing	22
General Principles	22
Transfer Pricing Documentation	22
Corporate Taxation of Foreign Entities	23
General Principles	23
Branch of a Foreign Entity	23
Permanent Establishment (PE)	23
Withholding Tax and Tax Securement	24
State Aid and Investment Incentives in Slovakia	25
Investment Incentives	25
Super-Deductions of Research & Development Costs	29

Other Taxes	30
Value-Added Tax	30
VAT Registration	30
VAT Group	30
Call-off Stock Simplification	31
VAT Rates	31
Special VAT Treatment	31
Reverse Charge in the Construction Industry	31
Exempt Supplies	32
Input VAT Deduction	32
VAT Compliance	33
EC Sales List	33
VAT Control Statement	34
Obligation of Electronic Filing	34
VAT Refunds	34
<i>VAT Refund for Slovak VAT Payers</i>	34
<i>VAT Refund for Foreign VAT Payers from Another EU Member State</i>	35
<i>VAT Refund for Foreign Entities from Non-EU Countries</i>	35
Excise Duties	36
Products Subject to Excise Duties	36
Authorised Entities	36
Registration	37
Excise Duty Compliance	37
Excise Duty Refunds	37
Customs Duties	38
General Principles	38
Right of Representation	38
Customs Procedures	38
Customs Debt	39

Simplifications	39
Changes in Customs Regulations from 1 May 2016	39
Motor Vehicle Tax	40
Property Tax	41
<i>Land Tax</i>	41
<i>Building Tax</i>	41
<i>Tax on Apartments</i>	41
<i>Common Provisions for Tax on Land, Buildings and Apartments</i>	42
Bank Levy	43
Special Levy	43

Individuals

Personal Income Tax

General Principles

- Slovak tax residents are liable to personal income tax on their worldwide income, subject to relief under Slovak law or an applicable double tax treaty.
- Slovak tax non-residents are liable to personal tax on their Slovak-source income.
- The tax year is the calendar year.
- Personal income tax rates depend on the individual's income. A tax base of up to 176.8 times the subsistence level (i.e. EUR 35,022.31) is subject to a 19% tax rate. Amounts in excess of this are subject to a 25% tax rate. Taxable income on dependent activity (employment) of selected constitutional officers is subject to a special tax rate of 5%.
- The tax rate on certain income on capital assets is unified at 19%.

Tax Residence

Slovak Tax Residents

- An individual is considered a Slovak tax resident if he:
 - has permanent residence in the Slovak Republic ("Slovakia"); or
 - is physically present in Slovakia for 183 days or more in a calendar year, either continuously or in total.

Slovak Tax Non-Residents

- Slovak tax non-residents are liable to Slovak income tax on their Slovak-source income such as:
 - income from work carried out in Slovakia;
 - income paid by a Slovak company for acting as a statutory representative of a company;
 - income from self-employment activities or from provision of services in Slovakia; and
 - income from interest, licence fees, the sale or rental of property located in Slovakia or from lottery winnings.
- Income may be subject to tax regardless of whether or not it is paid in Slovakia.

Personal Income Tax Base and Tax Losses

- An individual's tax base is formed by adding income from different sources (such as income from employment, income from entrepreneurial activities, income from other self-employment activities, rental income, and other income).
- Specific income from holding capital assets, i.e. interest, is included in a separate tax base from 2016.
- The Act specifies income that is tax exempt. From 2016, such income includes, subject to certain conditions, income on the sale of securities held for trading in a regulated market, provided that the period between their acceptance and sale exceeds one year, as well as income on long-term investment saving, after 15 years.
- In general, essential expenses incurred when generating and maintaining taxable income are deductible from this income. However, only compulsory social security and health insurance contributions paid by the employee can be deducted from employment income.
- Tax losses arising from entrepreneurial or other self-employment activities may be utilised equally during no more than four subsequent tax periods, but only to offset the taxable income from entrepreneurial or other self-employment activities. A tax loss cannot be utilised against, for example, rental income or income from capital investments.

Tax Allowances

- Tax allowances may only be claimed on income from employment and income from entrepreneurial or other self-employment activities.

Personal Allowance			
entitlement	each taxpayer		
applicable for annual tax base	below EUR 19,809.00	from EUR 19,809.00 up to EUR 35,022.31	over EUR 35,022.31
personal allowance	EUR 3,803.33	progressively decreased	EUR 0.00
Dependent Spouse Allowance			
entitlement	– <u>Slovak tax residents</u> sharing a household with a spouse; and – <u>Slovak tax non-residents</u> who receive more than 90% of their worldwide income from Slovak sources (if certain conditions are met).		
applicable for annual tax base	below EUR 35,022.31	from EUR 35,022.31 up to EUR 50,235.62	over EUR 50,235.62
spouse allowance	positive difference between EUR 3,803.33 and spouse's income	progressively decreased	EUR 0.00

Tax Bonus for Dependent Children

entitlement	<ul style="list-style-type: none">– <u>Slovak tax residents</u> with dependent children living in their household, provided they reach the minimum taxable income; and– <u>Slovak tax non-residents</u> who receive more than 90% of their worldwide income from Slovak sources.
applicable for taxable income of	at least EUR 2,280.00
tax bonus per one dependent child	EUR 21.41 monthly (applied in 2016)

Voluntary Contributions to Old-Age Pension Scheme

entitlement	from 1 January 2013 to 31 December 2016, the non-taxable part of the tax base also includes verifiably paid voluntary contributions to the old-age pension scheme
maximum non-taxable amount	verifiably paid contributions of up to 2% of the tax base from active income, however, no more than EUR 1,029,60 for 2016

Contributions to Supplementary Old-Age Pension Scheme

entitlement	after meeting specific conditions, the non-taxable part of the tax base also includes verifiably paid contributions to the supplementary old-age pension scheme
maximum non-taxable amount	verifiably paid contributions of up to EUR 180 for 2016

Tax Registration

- Individuals must register with the Slovak tax office for income tax purposes if they have obtained a permit to do business in Slovakia, have started performing other self-employment activities in Slovakia, or have rented real estate in Slovakia. They must register by the end of the month following the month in which they started the activity described above.
- Individuals are not obliged to register as taxpayers if they only receive income from employment (§5), income from capital investments (§7), other income (§8), or income that is subject to withholding tax (§43), or receive a combination of the above.

Tax Returns

- Generally, anyone who is liable for Slovak personal income tax and whose taxable income for the year exceeds a specific amount (in 2016, EUR 1,901.67) must file a personal income tax return, except for individuals:
 - who have no other income other than income which is taxed by a withholding tax (such as bank interest);
 - whose income is exempt from Slovak personal income tax; or
 - who have their salary taxed via a Slovak payroll and the employer prepares an annual tax reconciliation for them, and the individuals have no other taxable income.
- The filing and tax payment deadline is 31 March of the calendar year after the year in which the income is earned. This deadline may be extended by three calendar months if the tax office is notified in advance. The maximum extension is six months if the individual also receives income from abroad.
- Married couples must file separate, individual tax returns.

Donations

- A taxpayer can donate 2% (or 3% provided that certain conditions are met) of his tax liability for 2015 to a qualifying entity of his choice.

Penalties

- High penalties may be imposed for failing to file a tax return or pay taxes, or for doing so late, and for failing to declare significant amounts or all income sources. Penalties for individuals are calculated in the same way as penalties for companies.

Health Insurance and Social Insurance

- For 2016, the maximum assessment base for all types of social insurance (except for injury insurance which is unlimited) and health insurance will be five times the average salary earned two years ago, i.e. EUR 4,290.
- For self-employed individuals, the minimum assessment base for the purpose of social and health insurance is EUR 429 in 2016.

Health Insurance

- Health insurance contributions are generally obligatory for individuals who:
 - have permanent residence in Slovakia;
 - do not have permanent residence in Slovakia (e.g. they may only have temporary residence), and are not insured in another EU or European Economic Area member state or in Switzerland, and who have an employment contract with a Slovak employer or with a foreign employer who has a Slovak permanent establishment; or
 - do not have permanent residence in Slovakia, and are not insured in another EU or European Economic Area member state or in Switzerland, and are carrying out, or have a licence to carry out, business activities in Slovakia.
- Income that is subject to health insurance contributions includes all types of taxable income (income under §5, §6, §7, and §8 of the Income Taxes Act).
- The rate of health insurance contributions for individuals who receive dividends is 14% of the assessment base. The maximum annual assessment for all types of income may not exceed 60 times the average monthly salary from two years ago, i.e. EUR 51,480 for 2016. Contributions are not paid on dividends on shares traded on regulated local or international market.
- Individuals with permanent residence in Slovakia who perform activities abroad and are insured abroad are exempt from the obligation to pay contributions into the Slovak health insurance scheme.
- Regular monthly contributions to the health insurance scheme are considered to be advances to the annual liability, and are subject to an annual reconciliation performed by the relevant health insurance company, if required, by 30 September of the year following the year for which the contributions were made.

Social Insurance

- The Slovak social insurance system covers state old-age pensions, and insurance for sickness, permanent disability, unemployment, injury and employer insolvency, as well as contributions to guarantee insurance and a reserve fund.
- The Slovak old-age pension insurance system consists of three pillars. The first and (in general) second pillars are compulsory, while the third one is voluntary.
- Any income on employment and income on entrepreneurial or other self-employment activities (income pursuant to §5 and §6 of the Income Taxes Act) is subject to social insurance contributions, however, only up to the amount of the maximum assessment base (EUR 4,290 per month for 2016).

Overview of Health Insurance and Social Security Contributions

	Employee	
	rate	maximum monthly contributions for 2016 (in EUR)
sickness	1.4%	60.06
retirement	4%	171.60
permanent disability	3%	128.70
unemployment	1%	42.90
health	4%	171.60
guarantee insurance	–	–
reserve fund	–	–
total	13.4 %	574.86

	Employer	
	rate	maximum monthly contributions for 2015 (in EUR)
sickness	1.4%	60.06
retirement	14%	600.60
permanent disability	3%	128.70
unemployment	1%	42.90
health	10%	420.90
guarantee insurance	0.25%	10.73
reserve fund	4.75%	203.78
total	34.4 %	1,475.76

- In addition to these contributions, an employer must also make injury insurance contributions of 0.8% of an employee's total salary costs per month.
- On 1 January 2015, a deductible amount by which the assessment base is reduced for the employee and the employer was introduced for specific employee categories for health insurance.

Amount Deductible from the Assessment Base			
annual assessment base	EUR 4,560	from EUR 4,560 to EUR 6,840	EUR 6,840 + (incl)
amount deductible	EUR 4,560	progressively decreased	EUR 0.00

Companies

Corporate Income Tax

Entities Liable to Corporate Income Tax

- Any legal entity that has its seat or its management located in Slovakia is a taxpayer with unlimited tax liability (a tax resident). The taxpayer's worldwide income is the subject of tax. In order to avoid double taxation, tax treaties with relevant countries apply.
- Taxpayers with limited tax liability (tax non-residents) are only taxed on Slovak-source income.
- Group taxation is not allowed.

Tax Rate

- The corporate tax rate for 2016 is 22%.

Minimum Corporate Tax

- The minimum tax (tax licence) after deducting tax allowances and considering the tax that a legal entity must pay abroad, ranges from EUR 480 to EUR 2,880 depending on the annual turnover and on whether or not the entity is a VAT payer. If a company has at least 20% of employees with a health disability, the tax licence is halved.
- The tax licence is payable by the deadline for filing a tax return and may be deducted from the future tax liability, provided it is higher, over no more than three consecutive tax periods.
- In specific circumstances, the tax licence is not payable. For example, it is not payable in the first year of the taxpayer's existence.

Tax Base

- In general, the tax base is the profit/loss as determined under the Slovak Accounting Act, adjusted for tax purposes.
- If a taxpayer is obliged to report under International Financial Reporting Standards ("IFRS"), the tax base is derived from either:
 - the profit/loss under IFRS, adjusted for tax purposes using the IFRS bridge issued by the Slovak Ministry of Finance; or
 - the profit/loss that would be reported if double entry bookkeeping is applied in accordance with Slovak accounting standards.

- For tax non-residents who are not obliged to keep accounting records and decide not to do so, the tax liability is calculated by looking at the difference between income and expenses. An alternative method can be used to calculate the tax liability if the tax office gives its consent.

Not Subject to Tax

- The following items are not subject to corporate tax:
 - dividends paid out of profits earned after 1 January 2004;
 - liquidation surpluses and settlement amounts paid to shareholders, to which the shareholders were entitled after 1 January 2004;
 - income received by donation or inheritance; or
 - income from acquiring new shares due to an increase in share capital from retained profits, or from mergers, fusions and demergers.

Income Exempt from Taxation

- Exempt income includes:
 - interest and certain other income from loans and borrowings, bonds, etc. as well as royalties paid from sources in Slovakia to a taxpayer from an EU member state, who is the beneficial owner of such income provided that a certain relationship has existed between the entities for at least two years preceding the date when the income is paid.

Tax-Deductible Items

- Generally, tax-deductible items are those that the taxpayer incurs when generating and maintaining his taxable income. Documentation, such as receipts, invoices, or specific forms of documentation on transactions with foreign related parties, must be kept to support tax deductibility.
- When using an asset that can qualify as an asset for personal use, only the pro-rated part of related expenses/costs is tax deductible which is verifiably incurred to generate and maintain tax deductible income; or a flat rate of 80% applies provided that the asset is also used for private purposes.
- Some expenses are tax deductible for the debtor only upon payment (on a cash basis).
- From September 2015, a taxpayer who provides a practical education for a student based on a contract, may deduct a flat amount of EUR 3,200 from the tax base, together with incurred related costs at a specified amount.
- In addition, the Income Tax Act limits the tax deductibility of certain types of expenses.

Donations

- A taxpayer can donate 1.0% (or 2% provided that certain conditions are met) of his tax liability for 2015 to a qualifying entity of his choice.

Dividends

- Dividends paid out of profits generated after 1 January 2004 are not subject to Slovak income tax.

Interest

- Interest is generally tax deductible.
- Interest on borrowings and loans provided by related parties are tax deductible at no more than 25% of EBIDTA (the total of the result of operations before tax, including depreciation charges, and the interest expense).
- Interest paid by a Slovak tax resident to a Slovak tax non-resident is subject to withholding tax of 19%, unless it is tax exempt in accordance with the EU Directive on the common system of taxation applicable to interest and royalty payments as incorporated into Slovak tax legislation. From 1 March 2014, a 35% tax rate is applied to interest* paid to a resident of a country not specified in the list published by the Slovak Ministry of Finance or a country with which Slovakia has not entered into a double tax treaty or agreement on the exchange of information relating to taxes.

*The 35% tax rate also applies to other types of income.

Foreign Exchange Differences

- Foreign exchange differences booked via the profit and loss account and arising from the revaluation of unrealised receivables and payables as at balance sheet date are treated as taxable or tax deductible in accordance with their accounting treatment. However, they can be excluded from the tax base if the taxpayer reports them as such in the tax return.

Tax Losses

- A taxpayer can utilise a tax loss equally over four consecutive tax periods. From 2014, this also applies to unutilised cumulative tax losses for the tax periods that ended in 2010 to 2013.

Depreciation

- Tax depreciation (capital allowances) is generally available for expenditure incurred on non-current tangible and intangible assets. Tax depreciation can also be applied to assets acquired via a financial lease.
- The tax depreciation charges of non-current intangible assets equal the depreciation for accounting purposes, except for some specific instances relating to goodwill.
- Non-current tangible assets are classified into tax depreciation groups to which different tax depreciation periods apply, as follows:

Depreciation group	Depreciation Period (years)	Examples
1	4	motor vehicles, office machines, and computers,
2	6	engines, cooling and freezing equipment, some types of production equipment and machinery
3	8	assets of technological character, turbines, furnaces
4	12	prefabricated buildings made of concrete and metals, air conditioning systems, elevators
5	20	manufacturing and commercial buildings and constructions
6	40	residential and administrative buildings and constructions

- Some types of assets are excluded from depreciation.
- Tax depreciation may be interrupted for one or more taxable periods and continued subsequently as if no interruption occurred.
- With regard to assets classified in depreciation groups 2 and 3, the taxpayer may select either the straight-line or accelerated depreciation method. A separate formula applies for calculating tax depreciation charges for each method. The straight-line depreciation method applies to the majority of other assets.
- For non-current tangible fixed assets put into use, only a proportion of the depreciation charge can be applied. This is based on the number of months which the asset was in use.

Business Combinations

- Slovak tax law recognises two alternatives (the fair value method or the acquisition cost method) for the tax treatment of in-kind contributions to a company's share capital, and for mergers, fusions, and demergers.
- Specific rules apply for each tax treatment of transaction as well as for administrative obligations of participating parties.

Capital Gains and Securities

- In general, profit from the sale of securities is included in the corporate income tax base. A loss from the sale of securities is only tax deductible if certain conditions are met, or for specific taxpayers. From 1 January 2016 a new definition of input price has been introduced.
- The total costs related to derivatives are only tax deductible up to the total income from these derivatives arising in the same tax period. However, costs related to hedging derivatives and derivatives incurred by insurance companies, reinsurance companies or by a taxpayer holding a license for trading in securities issued by the state authorities, are tax deductible in full.
- The income on the transfer of an ownership interest in a commercial company or the membership interest in a cooperative with its seat in Slovakia is taxable in Slovakia. This does not apply to income earned by a taxpayer who is a taxpayer of an EU member state. In this instance, such income is taxable in Slovakia only if it arises from a Slovak tax resident (or a permanent establishment in Slovakia). The taxation of income on a transfer in Slovakia may also be regulated by the relevant double tax treaty.
- The income on the transfer of ownership interest in a commercial company or membership share in a cooperative, provided that the company or cooperative hold intangible assets located in Slovakia, the carrying value of which amounts to more than 50% of the transferor's equity, is taxable in Slovakia. The relevant double tax treaty may provide for a different taxation of such income in Slovakia.
- In-kind contributions in the share capital of a commercial company or cooperative with its seat in Slovakia may be taxable in Slovakia. The relevant double tax treaty may provide for a different taxation of such income in Slovakia.

Tax Period

- The corporate tax period can be:
 - a calendar year; or
 - a fiscal year different from a calendar year (12 consecutive calendar months).
- Special rules apply to winding up without liquidation, bankruptcy, and, in some cases, to a change of a taxpayer's legal form.
- The taxpayer must notify the tax office to change the tax period from a calendar year to a fiscal year and/or a different 12-month period.

Filing

- Corporate tax returns must be filed by the general filing deadline of three months from the end of the tax period. This deadline may be extended by another three calendar months based on a notification to the tax authority. If the taxpayer's income also includes income from sources abroad, the deadline may be extended by no more than six months.

Amended Tax Return

- If a taxpayer discovers an error in the tax return resulting in a higher tax liability or a lower tax loss, an amended tax return must be filed within one month of the month in which the error was discovered. Any additional tax must be paid within this time limit.
- If the taxpayer discovers an error which is in his favour in a tax return already filed, an amended tax return may be filed under certain conditions.
- From 1 January 2016, an amended tax return may also be filed after the commencement or extension of a tax control.

Payment

- The tax balance due for a fiscal year is payable by the general or extended tax return filing deadline.
- A company must also pay corporate income tax advances if its last known tax liability for the tax period exceeded EUR 2,500.00.

- Advances are payable:
 - quarterly (one-fourth of the last known tax liability) if the last known tax liability was between EUR 2,500 and EUR 16,600; or
 - monthly (one-twelfth of the last known tax liability) if the last known tax liability exceeded EUR 16,600.
- Withholding tax applicable to specific types of income (e.g. bank interest, monetary and in-kind supplies received by healthcare providers, their staff and health-care workers) is considered to be the final tax and cannot be treated as a tax advance.

Fines and Penalties*

- From 1 January 2016, the amount of the penalty for some administrative tax delinquencies is subject not only to the reported tax difference, but also to a significant extent by the length of the period during which the tax was reported incorrectly. In particular, this relates to situations where the tax reported in the tax return is increased by an amended tax return, or if the Tax Authority opens a tax control or imposes additional tax as a result of the control.
- A penalty will be imposed of a maximum of 1% of the imposed amount, however at a maximum of 100% of the imposed amount.
- A penalty for selected administrative delinquencies will continue to be assessed at a flat rate for a late filing or a failure to meet other non-monetary obligations.
- A system of collective penalties is introduced for more than one administrative delinquency.

*These sanctions also apply based on a tax order to other taxes than corporate income tax, e.g. to VAT.

Transfer Pricing

General Principles

- Prices between related parties must be set at fair market value (arm's length principle) for corporate income tax purposes. A taxpayer may apply to the tax office for approval of the valuation method, and from 1 September 2014 must pay a consideration ranging from EUR 4,000 to 30,000 together with the application.
- A related party (an individual or an entity) is a relative, a party economically or personally related, or a party otherwise connected (this relationship arises if the parties have established a business connection in particular for the purpose of decreasing the tax base or increasing the tax loss).
- The tax authorities may increase the tax base and assess penalties if they decide that arm's-length prices were not used in transactions between related parties, and this has resulted in a reduction in the Slovak entity's tax base or increase of a tax loss.

Transfer Pricing Documentation

- For the purpose of transfer pricing, taxpayers must keep transfer pricing documentation in a specified scope. They must present the documentation to the tax authorities upon request within 15 days. The tax authorities may send a request to present the documentation after the deadline for filing the tax return for that tax period.
- The content and scope of the documentation is determined by the Slovak Ministry of Finance and taxpayers must keep one of the following types of documentation: shortened, full scope or basic.
- From 2015, maintaining transfer pricing documentation is obligatory for both domestic and cross-border transactions between related parties.

Corporate Taxation of Foreign Entities

General Principles

- Slovak tax non-residents are only subject to Slovak tax on income generated in the Slovak Republic.
- A double tax treaty may wholly or partially eliminate double taxation of the income of Slovak tax non-residents earning income from Slovak sources.

Branch of a Foreign Entity

- The founder of a branch must, to the same extent as a Slovak company, register for tax, file a tax return, and pay tax and tax advances. A branch must apply Slovak accounting procedures.
- The taxation rules of a branch are appropriately applied to a branch.

Permanent Establishment (PE)

- A PE need not be entered in the Slovak Commercial Register, but a foreign entity with a Slovak PE is a taxable entity in Slovakia.
- A PE is created mainly if:
 - a permanent place or facility is used either continually or repeatedly by a foreign company carrying out business activities in Slovakia; or
 - a person acting on behalf of the foreign company repeatedly concludes contracts or negotiates details of contracts on its behalf; or
 - the period of providing services by the foreign company via its employees in Slovakia is more than six months in any 12-month period.
- The conditions for creating a PE may be regulated in more detail by a double tax treaty.
- A foreign entity with a Slovak PE has the same tax registration, filing, payment, and tax advance payment obligations as a Slovak company.
- The tax base of a foreign company's PE may not be less than one that would be achieved if it performed similar activities under similar conditions as an independent entity (e.g. a Slovak company).

Withholding Tax and Tax Securement

- The following payments are subject to withholding tax when made by Slovak companies to foreign parties.

	Standard Rate	Standard Rate**
fees for services provided in Slovakia (unless provided by a PE)	19%	35%
licence fees (royalties)*	19%	35%
interest on loans and deposits*	19%	35%
rental fee for movable assets	19%	35%

*Interest and licence fees paid to related parties and EU residents, are not subject to withholding tax if certain conditions are met.

**Income paid to a resident of a country not included in the list issued by the Slovak Ministry of Finance, or a country that does not have a double tax treaty with Slovakia or a treaty on the exchange of information relating to taxes, is subject to a 35% tax rate.

- However, a double tax treaty may reduce the rate.
- Some taxpayers (mostly tax residents in the EU) may treat the tax withheld on certain types of income as a tax advance and deduct it in their tax return.
- Individuals or legal entities may have an obligation to withhold a securement tax on some Slovak source income of Slovak non-residents provided that these persons are not tax residents in any other EU member state.
- The tax office will issue a confirmation of a withholding or security tax payment on request.

State Aid and Investment Incentives in Slovakia

Investment Incentives

- Investment incentives available under Slovak law are available for projects in the following areas:
 - manufacturing
 - technology centres
 - shared service centres
 - tourism

Industry

Unemployment Rate*	Minimum Investment Amount (in mil. EUR)	Percentage of New Technological Equipment (in %)	Minimum Number of New Jobs	Minimum Investment Amount that Must be Covered by Equity (in %)
lower than Slovak average	10	60	40	50
higher than Slovak average	5	50	40	50
at least 35% higher than Slovak average	3	40	40	50
Least developed regions	0,2	30	10	50

* For the purpose of granting investment aid, the unemployment rate is calculated from the total number of job seekers published by the Slovak Head Office of Labour, Social Affairs, and Family for the year preceding the year in which the investment plan was filed.

Technology Centres

Minimum Investment Amount (in mil. EUR)	Minimum Percentage of Employees with a University Education (in %)	Minimum Number of New Jobs	Minimum Investment Amount that Must be Covered by Equity (in %)
0,5	70	30	50



Jana
Borská

Trust



Valéria
Kadášová

Expertise



Dagmar
Haklová

Values



Todd
Bradshaw

Knowledge

Business



Rastislava
Krajčovičová

Solutions

Answers

Savings



Margaréta
Bošková



Radoslav
Krátký

Planning

Quality



Zuzana
Maronová

Professionalism



Martin
Javorček

Optimization



Christiana
Serugová

Cooperation



Daniela
Vojtková

People



Eva
Fričová



Alexandra
Jašicová

Reliability

Relationships



Lenka
Bartoňová

Responsibility



Zuzana
Šátková

Shared Service Centres

Minimum Investment Amount (in mil. EUR)	Minimum Percentage of Employees with a University Education (in %)	Minimum Number of New Jobs	Minimum Investment Amount that Must be Covered by Equity (in %)
0,4	60	40	50

Tourism

Unemployment Rate*	Minimum Investment Amount (in mil. EUR)	Minimum Percentage of New Technological Equipment (in %)	Minimum Number of New Jobs	Minimum Investment Amount that Must be Covered by Equity (in %)
lower than Slovak average	10	40	40	50
higher than Slovak average	5	20	40	50
at least 35% higher than Slovak average	3	20	40	50
Least developed regions	0,2	20	5	50

*For the purpose of granting investment aid, the unemployment rate is calculated from the total number of job seekers published by the Slovak Head Office of Labour, Social Affairs, and Family for the year preceding the year in which the investment plan was filed.

- The following investment incentives, all of which are considered state aid, are available:
 - cash grants for purchasing non-current tangible and intangible assets;
 - corporate tax credit – this incentive may be applied over no more than ten subsequent tax periods from the period in which the decision on granting the investment aid was issued;
 - financial support for creating new jobs; and
 - the transfer or swap of immovable assets at a discount.
- The main conditions to be met in order to apply for investment incentives are:
 1. establishment of a new operation, extension of, diversification of, or major production change in an existing operation;
 2. minimum investment costs, the level of which depends on the investment type and the region in which the investment will be implemented;

3. consideration of the required share of production facilities and/or the proportion of employees who have a university education and also depending on the type of project and specific region;
 4. creation of required number Of new direct jobs;
 5. for manufacturing expansion projects, increase of manufacturing capacity by at least 15%;
 6. the investment project must be implemented within three years of the approval of the investment incentives (major investment projects, i.e. projects with eligible costs exceeding EUR 50 million, must be implemented within five years);
 7. work on the project may start only after submission of the investment plan to the Slovak Ministry of Economy; otherwise aid cannot be granted.
- The maximum amount of investment aid is generally as follows:
 - West Slovakia – 25% of the overall eligible costs of the investment;
 - Central and East Slovakia – 35% of the overall eligible costs of the investment;
 - no investment incentives for the Bratislava region.

Super-deduction of Research & Development Costs

- Taxpayers who perform R&D activities may apply for a new form of support – the super-deduction of costs.
- For an R&D project, the total of the following items may be deducted from the tax base as reduced by the tax loss deduction:
 - **25% of R&D costs** incurred in the tax period for which the tax return is filed;
 - **25% of the wage costs of employees** involved in the R&D project in the tax period in which they were recruited under the condition that they are citizens of EU Member States, are under 26 and have completed full-time secondary school or university education no earlier than 2 years ago;
 - **25% of the R&D costs** incurred in the tax period that are **in excess** of the total R&D costs incurred in the next preceding tax period.
- If a tax loss is recorded, or if the tax base after the tax loss deduction is lower than the available deduction, the deduction may be applied in the next tax period in which the taxpayer reports a positive tax base, however, this cannot exceed four tax periods immediately following that in which the entitlement to deduct arose.

Other Taxes

Value Added Tax

VAT Registration

- The threshold for obligatory VAT registration for taxable persons with their seat or permanent address, place of business, or permanent establishment in Slovakia, is a turnover of EUR 49,790 for the previous consecutive 12 calendar months. Voluntary registration is also possible, which may be subject to tax securement.
- A VAT registration obligation in Slovakia may arise for foreign persons (taxable persons without a seat or VAT establishment in Slovakia) if they supply goods to Slovakia in the form of a home delivery service or prior to the supply of goods or services provided that the tax obligation is not transferred to the recipient.
- Any taxable person who is not a VAT payer, or a legal entity who is not a VAT payer must in some cases (such as receipt/provision of certain services from/to another EU member state and acquisition of goods from another EU member state) file an application for VAT registration for the paying of VAT or reporting the supply of goods.
- Automatic VAT registration was introduced for taxable persons who supply a building, its part, or building land that is not VAT exempt according to law and provided that a turnover of EUR 49,790 is expected to be reached based on the supply.
- Taxpayers must notify the Tax Authority of the change in the event of the creation/termination of an establishment for VAT purposes within 10 days of the change.
- In some instances, VAT registration may be subject to tax securement.
- Retroactive VAT registration and input VAT deduction is available in some instances.

VAT Group

- It is possible to create a VAT group in Slovakia that enables persons connected financially, economically, and organisationally who have their seat or permanent establishment in Slovakia, to register for Slovak VAT as a single VAT payer. As a result, the transactions within the VAT group are not subject to VAT.

Call-off Stock Simplification

- A simplified call-off stock scheme applies where a foreign supplier registered for VAT in an EU member state (other than Slovakia) transfers their own goods from another EU member state to a warehouse in Slovakia in order to supply them to a single Slovak VAT payer. If the foreign entity meets all the requirements set out in the Slovak VAT Act for applying a call-off stock regime, he need not register for Slovak VAT. In this case, the customer will must apply a reverse charge and pay VAT on the acquisition of goods in Slovakia.

VAT Rates

- The standard VAT rate of 20% applies to most goods and service. A reduced rate of 10% applies to some basic foodstuffs (e.g. meat, milk, bread), pharmaceutical products, some medical aids, depending on the commodity code (as listed in Annex 7 to the Slovak VAT Act), some books, and similar products.

Special VAT Treatment

- From 1 January 2016 a special approach is available for claiming VAT on a sale based on the receipt of payment for goods or services is available (cash accounting).
- A tax liability arises to the supplier of goods or services who applies this scheme only on the day he received payment for the goods or services. On the other hand, entitlement to deduct input VAT arises to a VAT payer who applies this scheme on the date of invoice payment. Similarly, a tax liability will arise for all VAT payers who receive an invoice from a supplier who applies this special treatment, on the date when their supplier receives the payment.

Reverse Charge in the Construction Industry

- For certain supplies between two Slovak VAT payers, a transfer of the tax liability to the recipient has been introduced (the reverse charge). This concerns, inter alia, the supply of construction work, the supply of buildings, the supply of goods with assembling or installation provided they are included in a special statistical classification.
- When providing those supplies, the supplier does not claim VAT on the invoice, and the obligation to remit VAT is transferred to the recipient (VAT payer), who may claim a VAT deduction upon compliance with legal requirements.

Exempt Supplies

- In general, exempt supplies without the possibility to deduct input VAT include, for example, postal services, financial and insurance services, educational services, radio and TV broadcasting services, health and social services, the supply and lease of real estate (with some exceptions), and lottery and similar games services.
- Exempt supplies with the possibility to deduct input VAT include, for example, the following transactions:
 - an intra-Community supply of goods;
 - financial and insurance services if provided outside the EU;
 - triangulation transactions;
 - transport of passengers in certain cases; and
 - the export of goods outside the EU.
- The sale of construction land is not VAT exempt. The sale of buildings, including the construction land on which the building stands, after five years from their official final inspection and occupancy approval or from their first use, is VAT exempt. However, a VAT payer may decide not to apply the exemption on such a supply (in this case, the tax liability is transferred to the recipient). The rent of real estate (with some exceptions, such as a parking space) is VAT exempt. A VAT payer may decide to charge VAT on the lease of a building to another taxable person.

Input VAT Deduction

- A VAT payer may deduct input VAT relating to a received taxable supply that he intends to use for taxable supplies of goods and services on which a deduction may be claimed.
- A VAT payer may not deduct input VAT on goods and services that will be used for exempt supplies without the possibility to deduct input VAT.
- A partial deduction based on a coefficient calculated pursuant to the law applies to purchases of goods and services used on both taxable supplies, on which input VAT deduction may be claimed, and on those on which input VAT deduction may not be claimed.
- Input VAT deduction relating to the acquisition of certain non-current assets must be adjusted if the purpose of use of such assets changes within five years of acquisition (20 years for real estate).
- A VAT payer may not deduct input VAT on the cost of entertainment and refreshments.

VAT Compliance

- VAT is administered by the tax authorities, except for import VAT which is administered by the customs office.
- A valid VAT document (invoice) must be issued for every supply of goods or services to a taxable person and for mail order services within 15 days of the supply of goods or services or receipt of payment prior to their supply. An invoice may also be issued and received in electronic form. An amending document must be issued within 15 days of the end of the calendar month in which the event occurred that gave rise to a change to the tax base.
- A VAT payer must be able to document the authenticity of origin, integrity of content, and end of the invoice archiving period. legibility of all invoices, from their issue until the
- VAT returns must be filed on a monthly basis. A VAT payer may decide on a quarterly filing period provided that more than 12 months have elapsed from the end of the calendar month in which he became a VAT payer, and his turnover was less than EUR 100,000 over the preceding 12 consecutive calendar months.
- VAT returns must be filed within 25 days of the end of the tax period, and any VAT liability must be paid by the filing deadline.
- In some instances, a VAT payer is liable for the tax shown on the invoice if the supplier fails to pay the tax to the tax office or if the supplier became unable to pay the tax and the taxpayer knew, or could have known, that the tax would not be paid.

EC Sales List

- VAT payers must submit EC sales lists if they make intra-community supplies of goods from Slovakia to another EU member state, transfer own goods from Slovakia to another EU member state, participate in triangulation simplification as the first customer, or provide services with their place of supply in another EU member state to another taxable entity and the customer is obliged to pay the VAT.
- A VAT payer may submit an EC sales list for a calendar quarter if the value of goods does not exceed EUR 50,000 in the respective quarter and the four previous concurrent calendar quarters. If the threshold is reached, a monthly EC sales list must be submitted.
- EC sales lists must be submitted within 25 days of the end of the period to which they relate, and they must be filed in electronic form.

VAT Control Statement

- All taxpayers (including foreign persons registered for VAT in Slovakia) must present a control statement in electronic form. This is a detailed list of all invoices issued and received.
- A control statement must be filed in electronic form by the 25th day after the end of the relevant tax period.
- A control statement does not contain information about intra-community supplies of goods and services, or imports and exports of goods. It is not required to file a control statement if only specific transactions are reported in the tax return (such as intra-community supply of goods, export of goods or supplies within triangulation) and where input VAT is not subject to deduction or if only VAT deduction is reported on the import of goods.
- The tax authority may impose a penalty of up to EUR 10,000 for failure to file a control statement, its late payment or for incomplete or incorrect data in a control statement. The maximum penalty for a recurrent breach of this obligation is EUR 100,000.

Obligation of Electronic Filing

- All tax entities who are VAT payers or who are represented by a tax advisor, attorney or other person, must deliver submissions to the tax authority in electronic form, either signed by a guaranteed signature or without a guaranteed signature. In the latter case, an Agreement on Electronic Filing is obligatory.

VAT Refunds

VAT Refund for Slovak VAT Payers

- A VAT payer is not automatically entitled to a cash VAT refund if he reports a VAT refund. If the VAT refund cannot be fully offset in the following VAT period, then the tax authorities will refund the excess input VAT or its part within 30 days of filing the VAT return for that following VAT period, provided that the tax authorities did not open a tax control prior to that date.
- However, if certain conditions are met, the tax office must refund the VAT within 30 days of the day that the VAT return is filed, i.e. earlier.

VAT Refund for Foreign VAT Payers from Another EU Member State

- A foreign VAT payer from another EU member state may claim Slovak VAT via the VAT refund scheme for foreign persons not registered for VAT in Slovakia.
- A request must be filed no later than 30 September of the calendar year following the period for which the VAT refund is claimed.
- A VAT refund claim must be submitted for a period no longer than one calendar year, and the total amount of VAT claimed must be at least EUR 50.

VAT Refund for Foreign Entities from Non-EU Countries

- An entity registered for VAT, or a similar general consumption tax, in non-EU countries may claim a refund of Slovak VAT paid on the purchase of some goods or services, under certain conditions as stipulated by law.
- A VAT refund may be claimed by submitting a request to the Bratislava Tax Office by 30 June of the calendar year following the year for which the refund is claimed. The total amount of the VAT claim must be at least EUR 50.
- A decision regarding the VAT refund must be issued to the foreign company within six months of the date on which the refund request was filed.
- VAT is refunded to entities from non-EU countries which have concluded reciprocity agreements with Slovakia.

Excise Duties

Products Subject to Excise Duties

- Slovak excise duty is payable on the import of the following goods into Slovakia from outside the EU, or when these goods are released from the duty suspension regime for tax-free circulation in Slovakia:
 - mineral oil,
 - beer,
 - wine,
 - spirits, and
 - tobacco products.
- An excise duty liability for electricity, coal, and natural gas arises at the moment that the product is delivered for final consumption.
- The rate of excise duty depends on the specific type of product.
- In certain limited cases, the products listed above are exempt from excise duty.

Authorised Entities

- An excise duty suspension arrangement enables the tax liability to be postponed until the day the product is released into the tax-free circulation regime.
- The production, processing, storage, receipt, and dispatch of products under the duty suspension arrangement are carried out by an authorised warehouse keeper.
- To obtain excisable products from another EU member state under the duty suspension regime, it is necessary to register as a licensed recipient.
- For transactions under the duty suspension regime (storage and transport), a tax guarantee must be lodged with the Customs Administration.
- The company must be authorised to use excisable products exempt from excise duty.

Registration

- An excise taxpayer must be registered with the customs office. Entities to which tax liability has not arisen, but which transact in goods that are subject to excise tax, are also subject to registration.
- Entities that intend to produce, store, receive, or send products subject to excise duty under the suspension arrangement must register with the customs office and lodge the required tax guarantee before authorisation will be granted.
- Companies using excisable products exempt from excise duty must register with the respective customs office, and apply for a licence and a voucher. The company then provides the voucher to its supplier, who can then provide the excisable products free of excise duty.
- Based on authorisation from the customs office, the registered consignee is entitled to dispatch the goods under suspension after they are released into tax-free circulation. He may not receive or store excisable goods.

Excise Duty Compliance

- The administrator of excise duty is the Customs Authority. Communication with the Customs Authority must be in electronic form provided that the company is a VAT payer registered in Slovakia or if it is represented by a tax adviser or attorney.
- The taxable period is usually a calendar month.
- Monthly excise duty returns must be filed within 25 days of the end of the taxable period, and excise duty liabilities must also be paid within this period. However, in some specific cases this obligation does not arise.

Excise Duty Refunds

- In certain circumstances, the tax warehouse keeper, or another authorised entity, may obtain a refund of Slovak excise duty on a product that has been taxed. In general, this applies if excisable products released for tax-free circulation in Slovakia are supplied to be used in another EU member state, or are used for purposes exempt from excise duty.

Custom Duties

General Principles

- Goods imported from non-EU countries are subject to import customs clearance.
- Goods exported from the EU customs territory must be declared for export customs clearance.
- The person responsible for paying the customs debt is the declarant.
- The declarant is the person making the customs declaration in his own name, or the person in whose name the customs declaration is made.
- A customs declaration must be made in the prescribed form and manner (in writing or by another action).
- Import or export duties are customs duties and other charges payable on the import or export of goods (import VAT, excise duties, and charges under the common agricultural policy).
- The customs authorities require declarants to provide a deposit to cover the customs debt if a customs debt arises. Such a deposit may be in cash, or may be provided by a guarantor.
- For the purpose of communication with the customs offices, each person must be identified by an EORI number (Economic Operator Registration and Identification Number), which is allocated by the customs authorities on request. EORI registration is mandatory for customs clearance.
- Export and transit customs clearance is based on the electronic exchange of information. From 1 May 2016, import customs clearance will be performed in electronic form in Slovakia.

Right of Representation

- Any person may appoint a representative in his dealings with the customs authorities. Such representation may be direct or indirect.

Customs Procedures

- The declarant may choose the customs approved procedure to be assigned to the goods:
 - the placing of the goods under a customs procedure;
 - their entry into a free zone or free warehouse;
 - their re-export from the EU customs territory;
 - their destruction; or
 - their abandonment to the exchequer.

- The goods may be released into free circulation or for export. The movement of non-EU goods must be covered by the transit customs procedure. Alternatively, the following regimes may be applied:
 - customs warehousing;
 - inward processing;
 - onward processing;
 - processing under customs control; and
 - temporary admission.

Customs Debt

- A customs debt is incurred at the time of acceptance of the customs declaration through:
 - the release for free circulation of goods liable to import duties, or
 - the placement of such goods under the temporary import procedure with partial relief from import duties.
- The debtor is a declarant and, for indirect representation, also a representative. Customs duty must generally be paid by the debtor within 10 days of delivery of the notification of the customs debt to the debtor.

Simplifications

- To simplify formalities and procedures, the customs authorities may grant permission to use the following simplified procedures:
 - an uncompleted customs declaration;
 - a commercial or administrative document instead of the customs declaration;
 - a local customs clearance;
 - an authorised consignee and sender.
- An “Authorised Economic Operator” is considered to be a reliable partner of the customs authorities, and this allows customs procedures to be simplified in various areas.

Changes in Customs Regulations from 1 May 2016

- *Please note that with effect from 1 May 2016 customs regulations will be changed significantly. In particular, the changes relate to customs regimes and conditions for their application, representation, customs debt securement, etc.*

Motor Vehicle Tax

- Motor vehicle tax is payable to the tax office in the place where the car was registered on 31 December of the preceding year. Employee's motor vehicle tax is subject to the employer's tax jurisdiction.
- Taxable vehicles are those registered in Slovakia and used for business purposes.
- In general, motor vehicle tax is payable by the car holder. In specific cases it is payable by the individual who uses the car for business purposes even if he is not the car holder (e.g. the car holder's employer)
- Annual tax rates are set:
 - for passenger cars, based on engine capacity in cm³; and
 - utility cars and buses based on the number of axles and the vehicle's total weight.
- The annual tax rate is the same for all of Slovakia. The rate changes depending on the time elapsed since the first registration of the car. A reduced tax rate applies to cars used in intermodal transportation and/or using an ecological engine.
- The tax period is a calendar year.
- A taxpayer must file a tax return and pay the tax liability for the previous year by 31 January. The taxpayer must enter the establishment and termination of the tax liability in the tax return.
- The taxpayer must pay monthly and/or quarterly tax advances depending on the amount of expected tax with a single tax administration, provided that the expected tax does not exceed EUR 700.
- With effect from 1 October 2012, a new fee (registration tax) was introduced in the Act on Administration Fees. This fee is payable when registering vehicles in categories L, M1, and N1 in the register of vehicles in Slovakia. The amount of tax ranges from EUR 33 to EUR 2,997 depending on the engine capacity of the registered car, and other details.

Property Tax

- Property tax is governed by the Act on Local Taxes, and is divided into:
 - land tax;
 - building tax; and
 - tax on apartments.

Land Tax

- Land tax is generally payable by the registered owner of land. In specific cases it is paid by the land manager or the lessee.
- The basic tax rate is 0.25% of the land value set out by law, but this is normally adjusted by the municipality, and different rates generally apply to different types of land, within certain limits.

Building Tax

- The building tax is generally payable by the registered owner of a building. In specific cases it is paid by the property manager or lessee.
- The basic tax rate is EUR 0.033 for each square metre of ground space occupied by the finished building. The tax rate is normally changed, within certain limits, by the issue of a generally binding regulation by the municipality.
- Car parks, including underground car parks are also subject to building tax.

Tax on Apartments

- Tax on apartments is generally payable by the registered owner of an apartment. In specific cases it is paid by the property manager.
- The basic annual tax rate is EUR 0.033 per square metre of floor area of the apartment. The tax rate is normally changed by the municipality issuing a general binding regulation.

Common Provisions for Tax on Land, Buildings, and Apartments

- The taxable period is the calendar year.
- The tax liability arises on 1 January following the year in which the taxpayer obtained an interest in the property subject to tax.
- The taxpayer must file a tax return by 31 January of the taxable period in which the tax liability arises, relating to his tax liability as at 1 January of this period. If changes occur in the following tax period, such as the acquisition of new property, a change of the type or area of already declared property, the taxpayer must file a partial tax return by the same deadline. The obligation to file a tax return during the tax period arises upon acquisition of property by inheritance.
- If the taxpayer discovers that the data in a filed tax return based on which the tax liability is calculated is incorrect, he is obliged to file an amended tax return no later than four years after the end of the year in which the obligation to file a tax return or a partial tax return arose.
- In general, a tax liability is payable within 15 days after the tax assessment became valid.

Bank Levy

- Since 1 January 2012, banks and branches of foreign banks must pay a special levy payable by certain financial institutions (the so-called bank levy) amounting to 0.4% of the base set out by law, while depending on selected indicators of the Slovak banking sector, this rate is gradually reduced until it reaches 0%.
- For 2015 and subsequent calendar years the levy has been reduced to 0.2%. This rate will apply until the total amount of received contributions is EUR 750 million at which time it is reduced to 0.1%.
- The levies are administered by the tax office.

Special Levy

- A special levy on business in regulated industries is payable by a legal entity or branch of a foreign entity which is authorised to do business in a regulated business (such authorisation must be issued in Slovakia or another EU or EEA member state and expects to achieve at least 50% of its total revenues from regulated business in the accounting period, and its total annual result of operation exceeds EUR 3 million.
- Regulated business sectors includes: the power industry, insurance, re-insurance, public health insurance, electronic communication, the pharmaceutical industry, postal services, rail transport, public water and drainage systems, air transport, and healthcare provision.
- A monthly levy is calculated by multiplying the levy base, i.e. the operational result before tax, and the levy rate of 0.00363.
- The levy is administered by the tax office responsible for corporate income tax administration.
- In accordance with the Act applicable at 1 January 2016, the last compliance period is December 2016.

Contacts

Todd Bradshaw

Country Managing Partner

Corporate Tax

todd.bradshaw@sk.pwc.com

+421 (0)2 59 350 600

Christiana Serugová

Partner, Tax Leader

Corporate Tax, M&A, International Taxes

christiana.serugova@sk.pwc.com

+421 (0)2 59 350 614

Lenka Bartoňová

Senior Manager

Investments and State Aid

lenka.bartonova@sk.pwc.com

+421 (0)2 59 350 694

Margaréta Bošková

Senior Manager

International Taxes, M&A

margareta.boskova@sk.pwc.com

+421 (0)2 59 350 611

Eva Fričová

Senior Manager

Indirect Taxes

eva.fricova@sk.pwc.com

+421 (0)2 59 350 613

Dagmar Haklová

Senior Manager

Bookkeeping

dagmar.haklova@sk.pwc.com

+421 (0)2 59 350 619

Alexandra Jašicová

Senior Manager

Transfer Pricing

alexandra.jasicova@sk.pwc.com

+421 (0)2 59 350 642

Valéria Kadášová

Senior Manager

VAT

valeria.kadasova@sk.pwc.com

+421 (0)2 59 350 626

Rastislava Krajčovičová

Senior Manager

Corporate Tax

rastislava.krajcovicova@sk.pwc.com

+421 (0)2 59 350 616

Radoslav Krátky

Senior Manager

International Taxes, M&A

radoslav.kratky@sk.pwc.com

+421 (0)2 59 350 569

Zuzana Maronová

Manager

Personal Tax

zuzana.maronova@sk.pwc.com

+421 (0)2 59 350 634

Zuzana Šátková

Manager

Customs Duties, Environmental Tax

zuzana.satkova@sk.pwc.com

+421 (0)2 59 350 675

Daniela Vojtková

Manager

VAT

daniela.vojtkova@sk.pwc.com

+421 (0)2 59 350 779

Jana Borská

Senior Legal Counsel

Law firm – PwC Legal

jana.borska@sk.pwc.com

+421 (0)2 59 350 728

Martin Javorček

Senior Legal Counsel

Law firm – PwC Legal

martin.javorcek@sk.pwc.com

+421 (0)2 59 350 111

Notes

Tax seminars with The Academy



Be prepared for tax challenges in 2016

The Academy, PwC's Educational Institute, has prepared the following seminars on VAT, international taxation, transfer pricing, corporate income tax and personal income tax.

- VAT School
- Income Tax School

Become a holder of the international taxation certificate:

ADIT – Advanced Diploma in International Taxation

ADIT is an internationally recognised qualification awarded by the Chartered Institute of Taxation (CIOT) that sets a global benchmark in international tax expertise. Gain more understanding of international taxation and a wider knowledge of various tax systems.

All of our professional certifications and seminars, up-to-date information on tax seminars, dates, prices and registration can be found at
www.pwcacademy.sk.



The Academy

Eva Hupková

Academy Leader

+421 (0)2 59350 414

eva.hupkova@sk.pwc.com

Martin Šalgo

Academy Business Representative

+421 (0)2 59350 156

martin.salgo@sk.pwc.com



Contact

PwC Office in Bratislava
Twin City Business Centre A
Karadžičova 2
815 32 Bratislava
Tel.: +421 (0)2 59350 111

PwC Office in Košice
Aupark Tower
Protifašistických bojovníkov 11
040 01 Košice
Tel.: +421 (0)55 32153 11

At PwC, our purpose is to build trust in society and solve important problems. We're a network of firms in 157 countries with more than 208,000 people who are committed to delivering quality in assurance, advisory and tax services. Find out more and tell us what matters to you by visiting us at www.pwc.com/sk.

PwC has been operating in Slovakia for 25 years already. In our offices in Bratislava and Košice, we have 500 professionals who are highly respected by our clients for their expertise and their commitment to establishing long-term relationships built on mutual trust.



© 2016 PricewaterhouseCoopers Tax, k.s. All rights reserved. In this document, "PwC" refers to PricewaterhouseCoopers Tax, k.s., which is a member firm of PricewaterhouseCoopers International Limited, each member firm of which is a separate legal entity.