



Doing Business in Croatia

2023

Audit / Tax / Advisory

Smart decisions. Lasting value.

Welcome

to Doing Business in Croatia

Doing Business in Croatia has been prepared by the Crowe Global member firm in Croatia in order to provide general information for persons planning to do business with or in the country concerned and/or individuals intending to live and work in Croatia temporarily or permanently.

This Guide includes relevant information about business operations and taxation matters. It is intended to assist organizations that are considering establishing a business in Croatia either as a separate entity or as a subsidiary of an existing foreign company. It will also be helpful to anyone planning to come to Croatia to work and live here either on secondment or as a permanent life choice.

Unless noted otherwise, the information contained in this Guide is believed to be accurate as of 1 January 2023. However, general publications of this nature cannot be used and are not intended to be used as a substitute for professional guidance specific to the reader's particular circumstances.

All lasting business is built on friendship.
Alfred A. Montapert



About Crowe Global

Crowe Global is ranked among the top 10 global accounting networks with more than 180 independent accounting and advisory services firms in about 140 countries around the world. Crowe Global's member firms are committed to impeccable quality service, highly integrated service delivery processes and a common set of core values that guide decisions daily.

Each firm is well-established as a leader in its national business community and is staffed by nationals, thereby providing the knowledge of local laws and customs which is important to clients undertaking new ventures or expanding into other countries. Crowe Global member firms are known for their personal service to privately and publicly held businesses in all sectors and have built an international reputation in the areas of audit, tax and advisory services.

General information

Local currency	EUR
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Types of organization

LLC

Name in local language	Društvo s ograničenom odgovornošću (d.o.o.)
Registrable in commercial register / legal entity	Yes / yes
Minimum capital	EUR 2,500
Minimal number of shareholders / Maximum number of shareholders	Sole shareholder company / no limit on number of shareholders except for simple limited liability company where the max. number is 5
Capital tax / Registration fees	No / registration in commercial register
Written form / notarization	Yes / yes
Registration with tax authorities	Yes
Statutory audit	If classified as public interest entity, or medium or large company, or if exceeding at least two of the following conditions: <ul style="list-style-type: none">• Revenue: EUR 3,981,684.25• Total assets: EUR 1,990,842.13• Average number of employees: 25

Public company (joint-stock company)

Name in local language	Dioničko društvo (d.d.)
Registrable in commercial register / legal entity	Yes / yes
Minimum capital	EUR 25,000
Minimal number of shareholders / Maximum number of shareholders	Sole shareholder company / n/a
Capital tax / Registration fees	No / registration in commercial register

Written form / notarization	Yes / yes
Registration with tax authorities	Yes
Statutory audit	<p>If listed on the stock exchange or if classified as public interest company, or as medium or large company, or if exceeding at least two of the following conditions:</p> <ul style="list-style-type: none"> • Revenue: EUR 3,981,684.25 • Total assets: EUR 1,990,842.13 • Average number of employees: 25

Branch (permanent establishment)

Name in local language	Podružnica
Registrable in commercial register / legal entity	Yes / no
Minimum capital	n/a
Minimal number of shareholders / Maximum number of shareholders	n/a
Capital tax / Registration fees	No / registration in commercial register
Written form / notarization	Yes / yes
Registration with tax authorities	Yes
Statutory audit	If classified as medium or large company

Value added tax (VAT)

Tax rates	<p>Standard VAT rate: 25%</p> <p>Reduced VAT rate of 13% applies to: accommodation services, newspapers and periodicals, children seats and children diapers, menstrual supplies, water supply except bottled water, electricity supply, municipal waste collection, urns and coffins, services and related copyright of writers, composers and artists, food preparation and serving inside and outside of the restaurants</p> <p>Reduced VAT rate of 5% applies to: all types of bread and milk, medicines approved by the competent authority, medical products and certain medical equipment, books, certain daily newspapers, scientific publications, cinema tickets, concert tickets and tickets for sport and cultural events, baby food, edible oils and fats, butter and margarine, live animals, fresh or chilled meat and entrails, fresh or chilled sausages and similar products, live fish, fresh or chilled fish and molluscs, fresh or chilled crabs, fresh or chilled vegetables, fresh or dried fruits and nuts, eggs, seedlings and seeds, fertilisers, pesticides and other agrochemical products, products mainly used as animal feed other than pet food, and, exceptionally, natural gas, firewood, pellets, briquettes and wood chips (until 31 March 2023 after which VAT rate of 13% applies)</p> <p>Reduced VAT rate of 0% applies to: delivery and installation of solar panels on private residential buildings, residential premises and public and other buildings used for activities of public interest</p>
Supply of goods	<p>Supply of goods for compensation and withdrawals for private purposes</p> <p>Place of supply of goods: Generally, the place where the goods are located at the moment of supply (including supply of goods without transport/ static supply, or transported goods/ moved supply)</p> <p><i>In case of B2B supply of goods dispatched or transported by the supplier, buyer or a third person from one Member State to another Member State:</i> the place where the dispatch or transport ends</p> <p><i>In case of supply of goods assembled by the supplier or another person on supplier's behalf:</i> the place where the goods are assembled</p> <p><i>Export of goods to third countries:</i> exempt from VAT</p> <p><i>Import from third countries:</i> Member State on whose territory the goods are located at the time of entry into the EU</p>

E-Commerce VAT rules:

In case of distance sales to buyers within the EU exceeding the unified threshold of EUR 10,000: the place where the dispatch or transport of goods ends (option of use of "OSS")

In case of distance sales of goods imported from third countries to buyers in the EU: the place where the dispatch or transport of goods ends (option of use of "IOSS")

Supply of services for compensation and private use / supply of services free-of charge (self-supply)

Supply of services

Place of supply of services (general rule):

B2B: Place of the service recipient

B2C: Place of the service provider

Supplies of services by intermediaries

B2B - General rule | B2C - Place of the underlying transaction

Real estate related services

B2B - Place of the real estate | B2C - Place of the real estate

Culture, art, sports, science, education and entertainment - admission to events

B2B - Where the event takes place | B2C - Where the services are physically carried out

Culture, art, sports, science, education and entertainment - organisation and ancillary services

B2B - General rule | B2C - Where the services are physically carried out

Passenger transportation services

B2B - Where the transport takes place, proportionate to the distances travelled | B2C - Where the transport takes place, proportionate to the distances travelled

Transport of goods

B2B - General rule | B2C - Non-EU: where the transport takes place, proportionate to the distances travelled; EU: the place where transportation started

Auxiliary transportation services

B2B - General rule | B2C - Where the services are physically carried out

Evaluation and processing of movable tangible goods

B2B - General rule | B2C - Where the services are physically carried out

Transfer and assignment of copyright, patents, licenses, trademarks and similar rights

B2B - General rule | B2C - Place of service recipient (if established outside the EU; otherwise general rule applies)

Advertising services

B2B - General rule | B2C - Place of service recipient (if established outside the EU; otherwise general rule applies)

Activities of consultants, lawyers, accountants, translations and other similar consulting services

B2B - General rule | B2C - Place of service recipient (if established outside the EU; otherwise general rule applies)

Data processing services

B2B - General rule | B2C - Place of service recipient (if

Special provisions (exemptions to the general rule)

established outside the EU; otherwise general rule applies)

Provision of information

B2B - General rule | B2C - Place of service recipient (if established outside the EU; otherwise general rule applies)

Bank and financial transactions, insurance and reinsurance services

B2B - General rule | B2C - Place of service recipient (if established outside the EU; otherwise general rule applies)

Personnel provision

B2B - General rule | B2C - Place of service recipient (if established outside the EU; otherwise general rule applies)

Renting of movable tangible assets (other than means of transport)

B2B - General rule | B2C - Place of service recipient (if established outside the EU; otherwise general rule applies)

Refrain from exercising, in whole or in part, certain economic activity or rights listed above

B2B - General rule | B2C - Place of service recipient (if established outside the EU; otherwise general rule applies)

Telecom, radio, TV services

B2B - General rule | B2C - Place of service recipient

Electronically supplied services

B2B - General rule | B2C - Place of service recipient

Reverse charge on local supplies

Applies to:

- All supplies of goods and services performed by non-established taxpayer without Croatian VAT ID number to the local taxpayer
- Construction work and services performed between two local taxpayers
- Sale of property (construction land and buildings with the associated land) for which VAT option is chosen
- Supply of disposed material
- Supply of greenhouse gas
- Supply of reinforced concrete and iron

Import of services

Subject to self-charged VAT, if taxable according to the local VAT legislation

Deadline and conditions for VAT refund

Input VAT refund for Croatian taxable persons within the EU

Via Tax Authorities' electronic system for VAT refund

Input VAT refund for taxable persons from other Member States

Via the Member State Tax Authorities' electronic system for VAT refund. Deadline for submission of VAT refund request is 30 September of the following year for the previous year

Input VAT refund for taxable persons from third countries

If no supplies are performed in Croatia, VAT refund request form must be submitted to the relevant Croatian Tax Authorities by 30 June of the following year at the latest. Official forms, along with original invoices, certificate of

	<p>residency must be submitted for VAT refund purposes. Minimum refundable amount: EUR 50</p>
Major Tax exemptions	<p>Zero rated (Input VAT deduction is applicable despite of VAT-free supply of goods and services)</p> <ul style="list-style-type: none"> • Exports of goods • Cross-border transportation of goods • Cross-border passenger transport by boat and aircraft • Mediation in respect of the above transactions <p>VAT exemption (Input VAT deduction is not applicable)</p> <ul style="list-style-type: none"> • Granting and administration of loans, insurance activities, postal services, services of hospitals, nursing and dental institutions, certain supplies by dental technicians and doctors, education, etc. • Small businesses (total net sales not exceeding EUR 39.816,84 per annum)
Real Estate	<p>Rent Renting of immovable property is subject to VAT. Exception: Renting for residential purposes is VAT exempt</p> <p>Sale The sale of new property is subject to 25% VAT. The sale of new property is considered to be the sale of buildings, associated land and construction site, if 2 years have not expired from the first use</p> <p>Financial leasing Supply of goods</p> <p>Operating Leasing Supply of services</p>
Foreign taxable persons (VAT registration)	VAT registration is required if supply is affected in Croatia to individuals or to non-established taxpayers without Croatian VAT ID number

Corporate tax

Accounting rules	<p>Double entry bookkeeping Application of Croatian accounting standards (i.e., Croatian Financial Reporting Standards (HSFI)) is mandatory for all entities. So called large entities, public interest entities and entities whose shares or bonds are listed on the stock exchange, or where stock exchange listing is being prepared, must apply International Financial Reporting Standards (IFRS)</p>
Tax rate	10% for taxpayers with annual revenue up to EUR 995.421,06 and 18% for all other taxpayers

Tax base	Accounting profit / loss determined in accordance with the applicable accounting standards (International Financial Reporting Standards or Croatian Financial Reporting Standards)
Tax assessment period	Calendar year, change possible if authorised by the Tax Authorities
Loss set-offs / carry forwards	5 years, no tax losses carry back
Tax / accounting depreciation	Straight-line depreciation. Depreciation for tax and accounting purposes must be the same. Possible doubling of depreciation rates for tax purposes if the same are used for accounting purposes
Tax deductibility of interest, Excessive interest rate rule, Thin capitalization rule	<p>Interest limitation rule Interest and other borrowing costs related to borrowings received from abroad are tax deductible up to EUR 3,000,000 or 30% of EBITDA, whichever is higher. This rule is not applicable for financial undertakings and standalone taxpayers (i.e. those that are not part of a consolidated group, are not obliged to prepare consolidated financial statements, have no associated enterprise or permanent establishment and do not approve or receive loans from their shareholders)</p> <p>Excessive interest rate rule Interest on loans granted by related parties is deductible up to the rate of 2.4% p.a. Higher interest rate possible if proven by transfer pricing study that such interest rate is market rate</p> <p>Thin capitalisation rule (debt / equity) Maximum debt / equity threshold for loans provided by foreign related parties and loans guaranteed by the direct shareholder holding more than 25% of shares: 4:1. This rule does not apply to loans provided by financial undertakings</p>
Reserves for bad debts, leaves, etc.	<p>Receivables value adjustment and bad debts write offs are tax deductible only if the prescribed criteria are fulfilled. Generally, provisions are not tax deductible. Exceptionally, the following provisions are tax deductible:</p> <ul style="list-style-type: none"> • Provisions for potential risks and expenditures based on law or contractual obligations (severance payments, renewing of natural resources, costs in guarantee periods, court proceedings and unused annual leave) • Provisions made by the banks against the risks of potential losses, up to the amounts prescribed by the Croatian National Bank • Provisions made by the insurance companies based on the relevant laws, up to the prescribed amounts
Other Major tax adjustments a) increasing and	<p>a) Increasing tax base Value adjustment of shares (unrealised losses), depreciation above prescribed rates, amortisation / impairment of goodwill,</p>

b) decreasing taxable profit

50% of entertainment expenses, 50% of personal car related expenses, shortages exceeding the amounts prescribed by the Croatian Chamber of Commerce / the Croatian Chamber of Crafts and Trades, general allowance for inventory and financial assets, costs related to forced collection of tax and other levies, fines imposed by the competent bodies, penalty interest charged by related parties, donations exceeding prescribed amounts, expenditures determined during tax audit procedure (including the applicable value added tax, personal income tax and mandatory social security contributions) incurred in relation to the hidden profit distribution, non-business related expenses, etc.

b) Decreasing tax base
Dividends and shares in profits, unrealised losses upon realisation, certain expenses not tax recognised in previous period (e.g. inventory and receivables value adjustment), prescribed incentives

Transfer pricing, Transfer pricing documentation, Related parties

Related parties
A company participates directly or indirectly in the management, control or capital of another company, or the same persons participate directly or indirectly in the management, control or capital of both companies
Companies connected by entrepreneurial agreements (company's business management, contracts on profit transfer and other entrepreneurial agreements entered into the court registry)

Transfer prices and transfer pricing documentation
Transfer pricing documentation is prepared in line with the OECD Guidelines and should be readily available on the Tax Authorities' request
Advance Pricing Agreements with the Tax Authorities are possible

Withholding tax

Interest

15% (a lower rate / elimination may be provided in accordance with the applicable DTT)
Based on EU Interest-Royalty Directive, interest paid to the EU company holding at least 25% of shares in the payer company, or to the EU company in which the payer company holds at least 25% of shares or to the EU company whereby a third EU company holds at least 25% of shares in both companies is not subject to withholding tax if: minimum holding of 25% for at least 2 years

Royalties

15% (a lower rate / elimination may be provided in accordance with the applicable DTT)
Based on EU Interest-Royalty Directive, royalties paid to the EU company holding at least 25% of shares in the payer company, or to the EU company in which the payer company holds at least 25% of shares or to the EU company whereby a third EU company holds at least 25% of shares in both companies are not subject to withholding tax if: minimum holding of 25% for at least 2 years

Dividends	10% (a lower rate / elimination may be provided in accordance with the applicable DTT) Based on EU Parent-Subsidiary Directive, dividends paid to the EU company holding at least 10% of shares are not subject to withholding tax if: minimum holding of 10% for at least 2 years
Services	15% on market research services, tax and business consulting services and audit services paid to non-residents legal entities (0% based on the applicable DTT)
Group taxation	No group taxation

Personal income tax

Taxable income	Resident taxpayers: world-wide income Non-resident taxpayers: income realised in Croatia (depending on provisions of DTT)
Income from employment / self-employment	Type of income: income from so called small businesses (crafts) and similar activities, income from independent professions, income from agriculture and forestry and income from electricity production. Tax rate: 20% on a tax base up to EUR 47,780.28 per annum and 30% on a tax base above EUR 47,780.28 per annum
Income from property and property rights	Type of income: leases, rentals, renting of flats, rooms and beds to travellers and tourists and organising camps, temporally limited cession of copyright, industrial property rights and other property rights, alienation of property and property rights Tax rate and tax base: <ul style="list-style-type: none"> • Leases and rentals: 10% • Income from leasing / renting decreased for 30% deemed expenses • Renting to travellers / tourists: fixed amount / bed, or 10% (flat rate) or, as self-employment activity (in case EUR 39,816.84 limit exceeded) • Property rights: 20% out of the market / sales value • Sale of property and property rights: 20% out of the difference between market / sales value and purchase / acquisition cost
Income from capital	Type of income: interest, withdrawals, capital gains, share based payments and stock options, dividends / shares in profit Tax rate and tax base: <ul style="list-style-type: none"> • Interest and dividends / shares in profit: 10% out of the gross amount • Capital gains: 10% out of the difference between market / sales value and purchase / acquisition cost

	<ul style="list-style-type: none"> Share based payments and stock options: 20% out of the market value Shareholder withdrawals for non-business purposes: 30% out of the market value
Other income	20%
Withholding tax	
Interest	10%
Royalties	20%
Dividends	10%
Capital gain	10%, if sold within 2 years from acquisition, 0% if sold after 2 years

Mandatory social contributions

Contribution rates	Pension insurance contribution: 20%; Health insurance contribution: 16.5%
Minimum and maximum contribution	Depend on the nature of employment and nature of payment
Self-employed individuals	<p>Minimum base for mandatory social contributions for 2023 depends on self-employment activity which is carried out. Generally, EUR 888.67 per month (if CPT payer EUR 1,503.90 per month)</p> <p>Pension insurance: First pillar: 15% Second pillar: 5% Maximum base for pension insurance contribution for first pillar for 2023: generally, EUR 98,436.96 per annum (EUR 8,203.08 per month)</p> <p>Health insurance: 16.5%</p>
Employed individuals	<p>Minimum base for mandatory social contributions for 2023: EUR 519.53 per month</p> <p>Pension insurance: First pillar: 15% Second pillar: 5% Maximum base for pension insurance contribution for first pillar for 2023: generally, EUR 98,436.96 per annum (EUR 8,203.08 per month)</p> <p>Health insurance: 16.5%</p>

BEPS implementation

CFC	If a foreign company is considered to be a controlled foreign company of a Croatian company and is not subject to tax or is exempt from tax in foreign jurisdiction, the Croatian company must include in its tax base profits of the controlled foreign company arising from the following categories of income: interest or financial assets income, royalties or intellectual property fees, dividends, financial leasing, insurance, banking, etc.
DAC 6	DAC 6 Directive has been fully implemented in Croatian legislation and has been in force since 1 January 2020. Reportable arrangements need to be reported to the Tax Authorities within 30 days
CbCr	Applies to multinational companies (MNCs) with a combined revenue of EUR 750 million or more
Profit shifting rule	Interest and other borrowing costs related to borrowings received from abroad are tax deductible up to EUR 3,000,000 or 30% of EBITDA, whichever is higher. This rule is not applicable for financial undertakings and standalone taxpayers (i.e., those that are not part of a consolidated group, are not obliged to prepare consolidated financial statements, have no associated enterprise or permanent establishment and do not approve or receive loans from their shareholders)
GAAR / other anti-abuse rules (PPT, etc.)	General Anti-Avoidance rules (GAAR) apply

Global employment issues

Work and Residence permit	Work and residence permit required for longer stays in Croatia (longer than 90 days), easier conditions for EEA citizens
Minimum salary	Minimum gross salary for 2023 amounts to EUR 700

Taxation of immovable property

Tax depreciation	Straight-line depreciation over the expected useful life of the asset. Depreciation must be the same for tax and accounting purposes
Depreciation categories	
Land	No depreciation

Building	Tax deductible depreciation period: up to 20 years (depreciation rate: 5% per annum)
Tax base	Acquisition cost
Special depreciation	Double depreciation rates can be used for tax purposes if used for accounting purposes as well
Real estate transfer tax	Subject to RETT is the transfer of ownership over land, rights to use the land and ownership of property if not subject to VAT. Tax base is the market / purchase value, which under certain circumstances may be assessed by the Tax Authorities. In general, tax rate is 3%. Exceptionally, sale of buildings and associated land and construction sites is subject to 25% VAT, if used for less than 2 years
Property tax (rate and base)	Tax base: m ² Tax rate: Fixed amount per m ² prescribed by the local self-government unites
Real estate funds	
Owner of the fund assets	Generally, the fund, so that for the investor there is no entry in the Land Register and no real estate transfer tax
Valuation	In principle, by the certified expert or the fund management company
Investment	In principle, 70% of net fund assets to be invested in property in Croatia and other EU Member States
Risk diversification	Value of any individual property not to exceed 20% of total fund assets

Other significant business-related taxes

Forestry tax / contribution	Payable by the taxpayers whose total annual income exceeds EUR 1,000,000 at the rate of 0.024% on total annual income
Tourist tax / contribution	Payable by the taxpayers who perform certain business activities at the rate ranging from 0.01705% to 0.14212% on total annual income
Monument tax / contribution	Monument tax based on total income: payable by the taxpayer who performs certain business activities at the rate of 0.05%, on total income realized from those activities. Monument tax based on the square metres of protected property: payable by the taxpayers who perform business activity in monument protected property at EUR 0,13-0,53 / square metre

Incentives

Investment incentives	CPT rate: 0% to 5% / 9% for up to 10 years
R&D incentives	Double dip for qualifying R&D expenses for CPT purposes
Young employees, elderly employees	Special employment incentives (the State is financing certain percentage of employee's salary for a year) and reduced social security contributions (for employees under 30 employed for an indefinite time-period)
Educational incentives	Double dip for qualifying education expenses for CPT purposes
Other special incentives / tax regimes and opportunities for business models	City of Vukovar: CPT rate: 0% Special state care areas: CPT rate: 5% / 9%

Tax liabilities

	For taxpayers	For directors (chief officers)	For shareholders
Binding opinion / Advanced tax rulings	Yes, for future transactions	n/a	n/a
Penalties for late payment of tax	Penalty interest on late payments (defined on a 6-month basis): 5.50% per annum (for the period from 1 January 2023 to 30 June 2023)	Penalty interest on late payments (defined on a 6-month basis): 5.50% per annum (for the period from 1 January 2023 to 30 June 2023)	n/a
Tax misdemeanour provisions	Fines up to EUR 66,360, i.e., for repeated offenses up to EUR 92,900	Fines up to EUR 5,300, i.e., for repeated offences up to EUR 6,630	n/a
Criminal provisions	Criminal penalties for tax fraud	Criminal penalties for tax fraud	n/a
Piercing the corporate veil	n/a	Personal liability of company's directors for misuse of their powers	Personal liability of company's owners and related parties for misuse of their powers

Advanced pricing agreements

Possible

n/a

n/a

Deadlines for reporting and payment of taxes and social contributions

Type of tax	Reporting deadline	Payment deadline
CPT	4 months after the business year end (e.g., if business year is equal to calendar year, reporting deadline is 30 April for the previous year)	Monthly CPT advance payments: by the end of the current month for the previous month Annual CPT liability: day of the CPT return submission (e.g., 30 April)
PIT	15th of the month for the previous month Taxpayers who are required to file an Annual PIT return - 28 February of the following year for the preceding year	15th of the month for the previous month Annual PIT return - 15 days upon receipt of the Tax Resolution
VAT	20th of the month following the end of the assessment period	By the end of the month following the end of the assessment period
Social contributions	15th of the month for the previous month	15th of the month for the previous month

Double taxation treaties

Country	Dividends	Royalties	Interest	Affected by MLI
Americas				
Canada	5/15	10	10	Yes
Chile	5 ⁶ /15	5/10	5/15	Yes
Asia/Pacific				
China	5	10	10	Yes
India	5 ³ /15	10	10	Yes
Indonesia	10	10	10	Yes
Japan	5/10	5	5	No
Korea	5 ¹ /10	0	5	Yes
Malaysia	5 ³ /10	10	10	Yes
Vietnam	10	10	10	Yes
Europe				
Albania	10	10	10	Yes
Austria	0 ³ /15	0	5	Yes
Azerbaijan	5 ⁹ /10	10	10	Yes
Belarus	5 ¹ /15	10	10	Yes
Belgium	5 ³ /15	0	10	Yes
Bosnia and Herzegovina	5 ¹ /10	10	10	Yes
Bulgaria	5	0	5	Yes
Czech Republic	5	10	0	Yes
Denmark	5 ² /10	10	5	Yes
Estonia	5 ³ /15	10	10	Yes
Finland	5 ² /15	10	0	Yes
France	0 ³ /15	0	0	Yes
Georgia	5	5	5	Yes

Germany	5 ³ /15	0	0	Yes
Greece	5 ² /10	10	10	Yes
Hungary	5 ¹ /10	0	0	Yes
Iceland	5/10	10	10	Yes
Ireland	5 ⁴ /10	10	0	Yes
Italy	15	5	10	Yes
Kosovo	5 ² /10	5	5	Yes
Latvia	5 ² /10	10	10	Yes
Lithuania	5 ¹ /15	10	10	Yes
Luxembourg	5 ³ /15	5	10	Yes
Macedonia	5 ¹ /15	10	10	Yes
Malta	5	0	0	Yes
Moldova	5 ¹ /10	10	5	Yes
Montenegro	5 ¹ /10	10	10	Yes
Netherlands	0 ³ /15	0	0	Yes
Norway	15	10	0	Yes
Poland	5 ² /15	10	10	Yes
Portugal	5 ³ /10	10	10	Yes
Romania	5	10	10	Yes
Russia	5 ⁵ /10	10	10	Yes
San Marino	5 ¹ /10	5	10	Yes
Serbia	5 ¹ /10	10	10	Yes
Slovakia	5 ¹ /10	10	10	Yes
Slovenia	5	5	5	Yes
Spain	0 ⁷ /15	0	0	Yes
Sweden	5 ² /15	0	0	Yes
Switzerland	5 ² /15	0	5	Yes
Turkey	10	10	10	Yes

Ukraine	5 ¹ /10	10	10	Yes
United Kingdom	5 ¹⁰ /15 ¹¹ /10	5	5	Yes
Middle East and Africa				
Armenia	0 ² /10	5	10	Yes
Iran	5 ² /10	5	5	Yes
Israel	5 ² /10 ⁸ /15	5	5/10	Yes
Jordan	5 ¹ /10	10	10	Yes
Kazakhstan	5 ² /10	10	10	Yes
Kuwait	0	10	0	Yes
Mauritius	0	0	0	Yes
Morocco	8 ¹ /10	10	10	Yes
Oman	0	10	5	Yes
Qatar	0	10	0	Yes
South Africa	5 ¹ /10	5	0	Yes
Syria	5 ³ /10	12	10	Yes
Turkmenistan	10	10	10	Yes
United Arab Emirates	5	5	5	Yes

¹ If the beneficial owner is a company which holds directly at least 25% of the capital of the company paying the dividends

² If the beneficial owner is a company (other than a partnership) which holds directly at least 25% of the capital of the company paying the dividends

³ If the beneficial owner is a company which holds directly or indirectly at least 10% of the capital of the company paying the dividends

⁴ If the beneficial owner is a company (other than a partnership) which holds directly at least 10% of the voting power of the company paying the dividends

⁵ If the beneficial owner is a company which holds directly at least 25% of the capital of the company paying the dividends (this share should be at least USD 100,000)

⁶ If the beneficial owner is a company which holds directly at least 20% of the capital of the company paying the dividends

⁷ If the dividends are paid to a company that has the capital of which is wholly or partly divided into shares, as long as it holds directly at least 25% of the capital of the company paying the dividends

⁸ When the beneficial owner is a company which holds directly at least 10% of the capital of the company paying the dividends where that latter company is a resident of Israel and the dividends are paid out of profits which are subject to tax in Israel at a rate which is lower than the normal rate of Israeli company tax

⁹ When the beneficial owner is a company (other than a partnership) which holds directly at least 25% of the capital of the company paying the dividends and has invested to the capital of that company at least EUR 150,000

¹⁰ If the beneficial owner is a company which is a resident of the other Contracting State and controls, directly or indirectly, at least 25% of the capital of the company paying the dividends (other than where the dividends are paid by an investment vehicle as mentioned in subparagraph (b))

¹¹ When those dividends are paid out of income (including gains) derived directly or indirectly from immovable property within the meaning of Article 6 by an investment vehicle which distributes most of this income annually and whose income from such immovable property is exempted from tax



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About Crowe in Croatia

We are committed to impeccable service quality, highly integrated service delivery processes and a common set of core values that guide our decisions daily.

Our firm is well-established as leader in our national business community and is staffed by nationals, thereby providing a knowledge of local laws and tax regulations, which is important to clients undertaking new ventures or expanding into other countries.

Our Global Reach

In addition to our local and regional services, as members of Crowe Global, we can draw on a worldwide network of independent professionals and their know-how. The Crowe Global network consists of more than 180 independent accounting and advisory services firms in about 140 countries around the world.

As member firm of Crowe Global we offer comprehensive, international expertise in a broad range of business consulting practices, including assurance, M&A, corporate finance, forensic services, human resources services, tax & regulatory.

This unique combination of our local and regional talent coupled with the global reach of our network provides us with the local expertise and global worldwide capabilities our clients expect and deserve.