ROMANIA TAX UPDATES

Romania Tax Newsflash

January 2025

Ordonanta de urgenta nr. 156/2024 (Ordonanta “trenulet”) privind unele masuri fiscal-bugetare in domeniul cheltuielilor publice pentru fundamentarea bugetului general consolidat pe anul 2025, pentru modificarea și completarea unor acte normative, precum și pentru prorogarea unor termene– publicata in Monitorul Oficial nr. 1334/31.12.2024 /

Emergency ordinance no. 156/2024 (so-called Ordinance “little train”) regarding some fiscal-budgetary measures in the field of public expenses for the set-up of the general consolidated budget for the year 2025, for the modification and completion of some normative acts, as well as for the extension of some deadlines– published in the Official Journal no. 1334/31.12.2024.

Ordonanta trenulet (OUG 156/2024) ce aduce modificari si completari asupra Codului Fiscal a fost publicata in Monitorul Oficial.

Aceste modificari sunt parte dintr-un efort mai amplu de a consolida fiscalitatea si de a asigura resursele necesare pentru Bugetul de stat pe anul 2025. Ele vor necesita o atentie speciala din partea contribuabililor pentru a se asigura conformitatea cu noile reglementari.

Prezentam mai jos principalele prevederi ale OUG 156/ 2024.

1. Impozitul pe dividende

- Cota de impozit pe dividende se majoreaza de la **8% la 10%** pentru toate dividendele distribuite atat persoanelor juridice cat si persoanelor fizice incepand cu 1 ianuarie 2025.
- Pentru dividendele distribuite in baza situatiilor financiare interimare intocmite in cursul anului 2024, cota de impozit pe dividende este **8%**, fara recalcularea impozitului pe dividendele respective dupa regularizarea acestora pe baza situatiilor financiare anuale aferente exercitului financiar 2024.

The little train Ordinance (GEO 156/2024) which brings changes and additions to the Fiscal Code was published in the Official Journal.

These changes are part of a larger effort to strengthen taxation and ensure the necessary resources for the State Budget for the year 2025. They will require special attention from the taxpayers to ensure compliance with the new regulations.

We list below the main provisions of GEO 156/2024.

1. Dividend tax

- The dividend tax is increased from **8% to 10%** for all dividends distributed to both legal entities and individuals starting with January 1, 2025.
- For the dividends distributed based on the interim financial statements prepared during the year 2024, the dividend tax rate is **8%**, without the recalculation of the tax on the respective dividends after their regularization based on the annual financial statements related to the 2024 financial year.

2. Microintreprinderi

- Se reduce plafonul pentru microintreprinderi:
  - Pentru 2025, de la 500,000 EUR la **250,000 EUR**
  - Incepand cu 1 ianuarie 2026, acest plafon scade la 100,000 EUR
- Pentru 2025, limita veniturilor realizate, reprezentand echivalentul in RON a 250,000 EUR/100,000 EUR incepand cu 1 ianuarie 2026, se verifica pe baza veniturilor realizate de catre persoana juridica romana la data de 31 decembrie 2024/31 decembrie 2025.
- Condiţia referitoare la ponderea veniturilor din consultanta si/sau management in veniturile totale, de la data de 31 decembrie 2024, nu se aplica pentru calculul limitei de 250,000 EUR.

3. Salariul minim

- **Constructii**: Se mentine salariul minim brut la nivelul de 4,582 RON/luna, fara a include indemnizatiile, sporurile si alte adaosuri.
- **Industria alimentara**: Salariul minim brut creste la 4,050 RON pe luna, fara a include indemnizatiile, sporurile si alte adaosuri.

4. Impozitul pe constructii speciale

- Se reintroduce impozitul pe constructiile speciale, cunoscut si sub numele de "taxa pe stalp", cu o cota de **1%** aplicata asupra valorii constructiilor existente la 31 decembrie a anului anterior, din care se scade valoarea cladirilor pentru care se datoreaza impozit pe cladiri.

2. Micro-enterprises

- The threshold for micro-enterprises is reduced:
  - For 2025, from EUR 500,000 to **EUR 250,000**
  - Starting with 1January 2026, this threshold is decreased to EUR 100,000
- For 2025, the revenue limit, representing the equivalent in RON of EUR 250,000/EUR 100,000 starting with 1 January 2026, is checked based on the revenues made by the Romanian legal entity as at 31 December 2024/31 December 2025.
- The condition regarding the percentage of revenues from consulting and/or management in total revenues, as of 31 December 2024, does not apply for the computation of the EUR 250,000 limit.

3. Minimum wage

- **Construction**: The minimum gross salary is maintained at the level of 4,582 RON/month, without including allowances, increments and other additions.
- **Food industry**: The minimum gross salary increases to 4,050 RON per month, not including allowances, increments and other additions.

4. Tax on special constructions

- The tax on special constructions, also known as the "pole tax", is reintroduced, with a rate of 1% applied to the value of the existing constructions as at 31 December of the previous year, from which is deducted the value of the buildings for which the building tax is due.

5. Impozit pe venit si contributii sociale

i. Se elimina facilitatile fiscale pentru angajatii din sectorul IT, constructii si industria alimentara

- Angajații din IT, constructii, agricultura si industria alimentara nu mai sunt scutiti de impozit pe venit, incepand cu veniturile lunii ianuarie 2025.
- Se abroga prevederea cu privire la Pilonul II. Astfel, angajatii din aceste sectoare revin cu contributiile lunare la Pilonul II de pensii private obligatorii.

ii. Se mentine suma de 300 RON neimpozabila la salariul minim

- Pentru suma de 300 RON/luna reprezentand venituri din salarii si asimilate salariilor nu se datoreaza impozit pe venit si contributii sociale obligatorii, pana la 31 decembrie 2025.

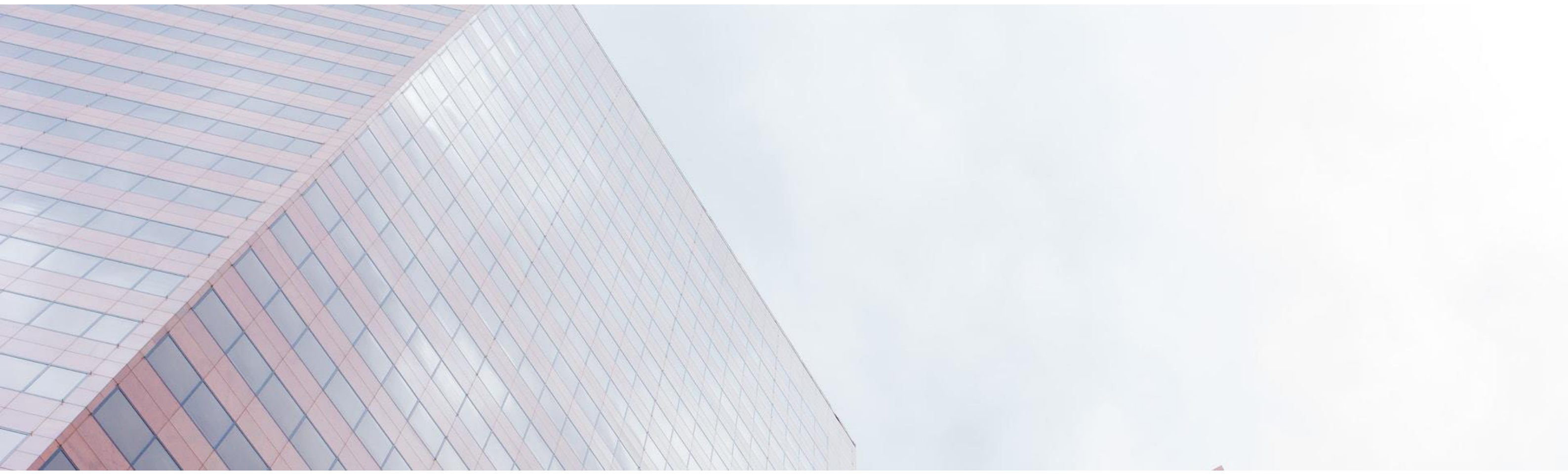
5. Personal income tax and social charges

i. Tax facilities for employees in the IT sector, construction and the food industry are eliminated

- Employees in IT, construction, agriculture and the food industry are no longer exempt from income tax, starting with the income of January 2025.
- The provision regarding Pillar II is repealed. Thus, the employees in these sectors return with the monthly contributions to Pillar II of mandatory private pensions.

ii. The non-taxable amount of RON 300 is maintained for the minimum wage

For the amount of RON 300/month representing income from salaries and deemed as salaries in view of taxation, no personal income tax or mandatory social contributions are due, until 31 December 2025.



Nu ezitati sa ne contactati pentru orice clarificari sau intrebari.

Please do not hesitate to contact us for any clarification or enquiry.

Contact us

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