



# Corporate Income Tax – 2026

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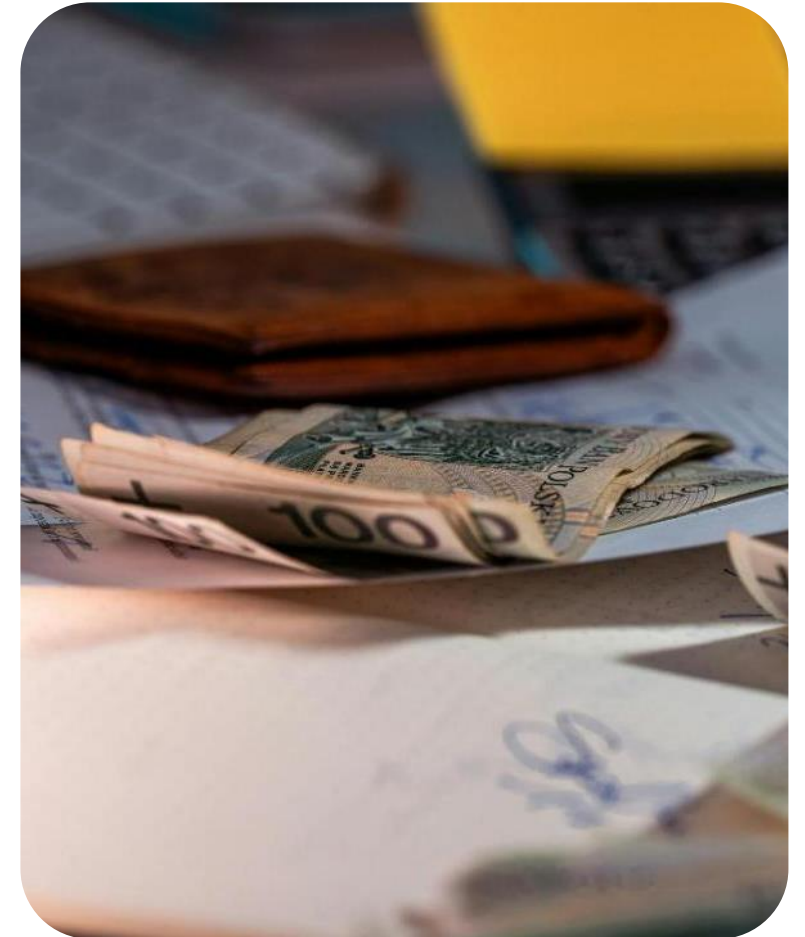


# Corporate Income Tax

Year 2026

## Corporate Income Tax Rates

<b>Standard Tax Rate</b>	<b>18%</b>
Banks and Financial Institutions	25%
Banks in 2026	50%



# Corporate Income Tax

Year 2026

The tax base is determined on the basis of the company's accounting profit:

Income	Tax base	Tax return filing deadline
< 40 million UAH	Annual accounting profit prepared in accordance with local accounting standards or IFRS. An annual tax return is required to be filed.	Within 60 days after the end of the year
> 40 million UAH	Quarterly accounting profit prepared in accordance with local accounting standards or IFRS, adjusted for tax purposes (additions or deductions). Tax returns are filed on a quarterly basis.	Quarterly – within 40 days after the end of the quarter Annual – within 60 days after the end of the year

# Tax adjustments

## Key temporary differences

Significant temporary tax adjustments that increase or decrease the tax base depending on accounting treatment.

- 1) Allowances for impairment of accounts receivable (expected credit losses). This adjustment does not apply to banks and financial institutions.
- 2) Provisions for future expenses (excluding provisions related to personnel costs).
- 3) Depreciation of property, plant and equipment (PP&E).

# Tax adjustments

## Key permanent differences

Significant permanent tax adjustments increase the taxable base.

- 1) Fines and penalties paid to government authorities;
- 2) Fines, penalties, or compensation for lost profits paid under contracts to entities not subject to corporate income tax;
- 3) Non-repayable financial assistance provided to affiliated entities that have incurred losses;
- 4) Royalties exceeding 4% of the prior year's net income;
- 5) Charitable contributions exceeding 4% or 8% (if at least 4% was donated to charitable organizations) of the prior year's taxable income;
- 6) Absence of a business purpose (reasonable economic justification) in transactions with non-residents;
- 7) Pricing of goods, works, or services that does not comply with the arm's length principle.

# Corporate Income Tax

## Fixed assets

Fixed assets with a value exceeding **20 TUAH**.

Useful lives

Type of property, plant and equipment (PP&E)	Useful life, years
Buildings	20
Machinery and equipment	5
IT equipment	2
Vehicles	5
Tools, equipment, supplies, furniture	4

In practice, the same useful lives are typically applied in financial and tax accounting.

# Tax adjustments

## Thin capitalization rules

If

- debt obligations to non-residents exceed equity by **more than 3.5 times**

Then

- the limit is **30%** \* (Tax base+ Finance costs + Tax depreciation)

If the debt-to-equity ratio is negative, apply a full adjustment by the percentage amount.

No adjustment is made for:

- %, that do not comply with the arm's length principle (fully adjusted)
- %, in favor of IFIs (international finance institutions)
- %, in favor of foreign banks

Does not apply to financial institutions and leasing companies.

# Corporate Income Tax

## Tax losses

Tax losses are carried forward indefinitely, but the amount is capped for large taxpayers.

	Criteria	Carryforward of tax losses
Large taxpayers	Within a period of four consecutive quarters: - Revenue exceeding 50 million EUR or - Taxes paid exceeding 1,5 million EUR	50% of the loss from the previous period. If the loss is less than 10% of the current year's profit, it is carried forward in full
All other taxpayers		No restrictions

# Corporate Income Tax

## Transactions with non-residents

### Increase in the final score:

30% of the value of goods (services) sold and purchased:

- transactions with low-tax jurisdictions;
- transactions with certain legal entities.

For Germany:

Starting from 2025, this provision does not apply if:

- (a) all members of the partnership are residents of the same country;
- (b) and that country has a double taxation treaty with Ukraine.

Offene Handelsgesellschaft	OHG
Gesellschaft bürgerlichen Rechts	GbR
Kommanditgesellschaft	KG
Kommanditgesellschaft auf Aktien	KGaA
Aktiengesellschaft und Compagnie Kommanditgesellschaft	AG & Co.KG
Gesellschaft mit bürgerlicher Haftung und Compagnie Kommanditgesellschaft	GmbH & Co.KG
Unternehmergesellschaft und Compagnie Kommanditgesellschaft	UG & Co.KG
Gesellschaft mit beschränkter Haftung und Compagnie Offene Handelsgesellschaft	GmbH & Co. OHG
Gesellschaft mit beschränkter Haftung und Compagnie Kommanditgesellschaft auf Aktien	GmbH & Co. KGaA
Aktiengesellschaft und Compagnie Kommanditgesellschaft auf Aktien	AG & Co. KGaA

# Corporate Income Tax

## Transfer pricing

Applies to companies meeting the following criteria:

Cost criteria (annual)	Counterparties
Revenue exceeding 150 million UAH <u>and</u> The total value of transactions with the counterparty exceeds 10 million UAH	Related parties
	Companies registered in low-tax jurisdictions
	Companies with specific legal form

A price above or below the arm's length value increases the tax base and is treated as dividends (constructive dividends).

# Your Contacts



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