

Slovenia Country Profile

EU Tax Centre

June 2019

Key tax factors for efficient cross-border business and investment involving Slovenia

EU Member State Yes

Double Tax Treaties With the following countries, territories and jurisdictions:

Albania	Estonia	Rep. of Korea	Romania
Armenia	Finland	Kosovo	Russia
Austria	France	Kuwait	Serbia
Azerbaijan	Georgia	Latvia	Montenegro
Belarus	Germany	Lithuania	Singapore
Belgium	Greece	Luxembourg	Slovakia
Bosnia & Herzegovina	Hungary	North Macedonia	Spain
Bulgaria	Iceland	Malta	Sweden
Canada	India	Morocco ^(a)	Switzerland
China	Iran	Moldova	Thailand
Croatia	Ireland	Montenegro	Turkey
Cyprus	Isle of Man	Netherlands	UAE
Czech Rep.	Israel	Norway	UK
Denmark	Italy	Poland	Ukraine
Egypt ^(a)	Japan	Portugal	US
	Kazakhstan	Qatar	Uzbekistan

Notes: (a) Treaty signed but not yet in force

Most important forms of doing business

Limited liability company and joint-stock company, also limited and general partnerships.

Legal entity capital requirements

Share capital: EUR 7,500 for limited liability company and EUR 25,000 for joint stock company.

Residence and tax system	<p>Legal entities having their legal seat or place of effective management in the territory of Slovenia are residents for income tax purposes.</p> <p>Resident companies are taxed on their worldwide income. Non-resident companies are taxed on their Slovenian source income only.</p>
Compliance requirements for CIT purposes	<p>Fiscal year can equal or deviate from the calendar year. In general, submission of the CIT return to tax authorities within 3 months after the end of the fiscal year.</p>
Corporate income tax rate	<p>The standard corporate income tax rate is 19 percent.</p>
Withholding tax rates	<p>On dividends paid to non-resident companies</p> <p>Vary between 15 percent and exemption.</p> <p>On interest paid to non-resident companies</p> <p>Vary between 15 percent and exemption.</p> <p>On patent royalties and certain copyright royalties paid to non-resident companies</p> <p>Vary between 15 percent and exemption.</p> <p>On fees for technical services</p> <p>No, unless services paid to a company located in tax haven and such country is listed on a "black list" published by the Ministry of Finance in Slovenia.</p> <p>On other payments</p> <p>See above.</p> <p>Branch withholding taxes</p> <p>See above.</p>
Holding rules	<p>Dividend received from resident/non-resident subsidiaries</p> <p>Exemption. No participation requirement or minimum holding period is required. Exemption does not apply where the dividend paying company is resident in a non-EU jurisdiction where the general or average nominal tax rate is lower than 12.5 percent and which is included on a "black list" published by the Ministry of Finance.</p> <p>Capital gains obtained from resident/non-resident subsidiaries</p> <p>50 percent exempt if certain conditions are met:</p> <ul style="list-style-type: none"> - Participation requirement: 8 percent; - Minimum holding period: 6 months; - At least one employee employed on a full-time basis in the period concerned;

- The participation should not be held in a company that is resident in a non-EU jurisdiction where the general or average nominal tax rate is lower than 12.5 percent and which is included on a “black list” published by the Ministry of Finance.

Tax losses

Tax loss may be carried forward without limit and may be utilized up to the amount equal to 50 percent of the positive taxable basis.

No carry back of losses.

If, during a tax period, the ownership of equity capital and/or equity holdings or voting rights of the taxpayer changes directly or indirectly by more than 50 percent compared to the state of ownership at the beginning of the tax period and the taxpayer (i) did not perform the activity two years prior to the change in ownership; or (ii) considerably changed the activity two years prior to or after the change in ownership, accumulated tax losses, as well as losses realized in the year of the change in ownership, cannot be carried forward.

Tax consolidation rules/Group relief rules

No

Registration duties

No

Transfer duties

[On the transfer of shares](#)

No

[On the transfer of land and buildings](#)

2 percent Real Estate Transfer Tax.

[Stamp duties](#)

No

[Real estate taxes](#)

No

Controlled Foreign Company rules

Yes

Transfer pricing rules

[General transfer pricing rules](#)

Yes

[Documentation requirement](#)

Yes

Thin capitalization rules

Yes, the debt-to-equity ratio is 4:1.

General Anti-Avoidance rules (GAAR)	Yes
Specific Anti-Avoidance rules/Anti Treaty Shopping Provisions/Anti-Hybrid rules	Principle "substance over form" - Tax Procedure Act.
Advance Ruling system	Binding rulings may be obtained before the intended transaction is undertaken. With regard to transfer pricing, unilateral, bilateral or multilateral Advanced Pricing Agreements can be concluded.
IP / R&D incentives	Yes
Other incentives	40 percent investment incentive on intangible assets and equipment (except for office equipment and furniture). 100 percent tax allowance for R&D expenses.
VAT	The standard rate is 22 percent, and the reduced rate is 9.5 percent.
Other relevant points of attention	No

Source: Slovenian tax law and local tax administration guidelines, updated 2019.

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