



# Key changes in the tax legislation of Russia in 2026



February 2026

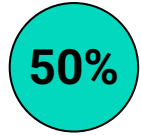


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# Income Tax



## Limitation of Carrying Forward Accumulated Losses

- Possibility to carry forward accumulated loss of  $\leq 50\%$  of the tax base **extended until 2030**



## The list of expenses has been expanded:

- Fines and penalties confirmed by the court in respect of bad debts are included in the income tax base. At the same time, the debt is not recognized as bad debt in the date of recognition of the corresponding income has not yet occurred
- Property acquired using targeted budget funding is recognized as depreciable; however, such budget funds are not included in the initial cost of the property



## The procedure for recognizing income and expenses on certain transactions has been changed

- The multiplying coefficient of 2 **does not apply** to expenses for acquiring rights to software if the agreement permits transferring such rights to third parties
- Compensation for the expropriation of property for state or municipal needs **is not recognized as income**, and expenses covered by such compensation are not taken into account
- Free of charge property (provided that participation in the capital is  $\geq 50\%$ ) **is not exempt from taxation** if the recipient or its participants ( $\geq 10\%$ ) are Foreign agents

# Income Tax



## Limited application of benefits

- **Rates:**

Foreign agent organizations, as well as organizations with a share of foreign agents of more than 10%, are not entitled to apply most of the reduced income tax rates

- **IT Benefits:**

Residents of Skolkovo and ISTC are not entitled to apply for IT income tax benefits

- **Investment tax deduction:**

Subjects of the Russian Federation has the right to approve the list of expenses in respect of which the ITD can be applied. The corresponding costs can be taken into account as expenses



## Other changes in income tax

- Members of multinational corporate groups with global revenues over €750 million and activities in Russia will face a new mechanism guaranteeing a minimum 15% effective profit tax rate (mirroring Pillar 2 rules)

# Value Added Tax



## Rate increase:

	2025	2026
<b>Base rates</b>	20%	<b>25%</b>
<b>Calculated Rates</b>	16,67% (20/120%)	<b>18,03%</b> <b>(22/122%)</b>



## The procedure for taxation of certain transactions has been changed

- ✓ Servicing of bank cards and settlements on them
- ✓ Renting mining infrastructure to foreigners
- ✗ Transfer of real estate for state and municipal needs



## VAT for simplified tax system:

- Revenue threshold for VAT exemption reduced:
  - ~~60 million rubles in 2025~~
  - 20 million rubles in 2026
  - 15 million rubles in 2027
  - RUB 10 million from 2028

**!** If the income for 2025 exceeded 20 million rubles, then from 2026 the taxpayer on the simplified tax system pays VAT

# Personal Income Tax



## The 5-year benefit for the sale of shares has been truncated

- The exemption applies only when exercising the rights of participation in Russian legal entities
- The exemption does not apply when a member withdraws from the company



## Changes in contributions to authorized capital and reorganizations

- If shares or **stakes** qualifying for the 5-year tax exemption are contributed to a Russian legal entity's charter capital, material benefit income may be calculated by comparing the market value of the received shares/stakes against the market value of the contributed assets as of the transfer date



## Personal income tax rates for certain categories of taxpayers have been changed

- Tax residents of EAEU member states and their citizens engaged in labor activities in Russia are subject to PIT at rates of 13–22%
- The income of individuals with the status of a Foreign Agent is subject to personal income tax at a rate of 30%, in addition, some exemptions do not apply



## The list of income exempt from personal income tax upon donation has been clarified

- Not only shares, but also other securities, as well as derivative financial instruments, are subject to exemption

# Insurance Contributions



## Application of insurance contributions for IT companies

- The tariff is increased:
  - **15% within the limit base**
  - 7,6% Above the limit base
- Residents of Skolkovo and ISTC **are not entitled** to apply reduced contributions for IT



## Innovations in insurance contributions for SMEs

- A reduced tariff of 15% (for payments over 1.5 minimum wages) applies only if:
  - the main OKVED is included in the list of the Government of the Russian Federation
  - share of core income  $\geq$  70%



## Other changes in insurance contributions

- Material assistance to employees upon the birth of a child, up to RUB 1 million, is exempt from insurance contributions
- The minimum base for calculating insurance contributions on payments to company executives is set at no less than the minimum wage
- Voluntary medical insurance for employees on foreign business trips is exempt from insurance contributions
- A single fixed payment has been established for individual entrepreneurs combining multiple types of activities regarding fixed insurance contributions

# Property Taxes and Other Changes



## Error correction

In case of an increase in tax rates, correction of the error by reflecting the adjustment in the current period is not allowed



## Changes for CFCs

Exemption of active holding and sub-holding CFCs from income tax applies if **income tax rate** in the country of registration of the CFC  $\leq 15\%$



## Controlled transactions

Transactions with persons whose location or tax residence is in a country with an income **tax rate of  $< 15\%$  are recognized as controlled**



## Increasing the depth of a tax audit

During a field tax audit, completed tax periods of the year in which the audit decision was made may also be checked



## The procedure for calculating taxes has been changed

The calculation of transport and land taxes, as well as corporate property tax on objects taxed at cadastral value, is now carried out by the tax authorities (starting from 2027)



## The procedure for the formation of the "cadastral list" has been changed

The list of objects for which the tax base is determined by cadastral value is formed as of March 1 of the current tax period

# How Global Aim Can Help



## Tax advice on complex local and international tax issues:

- Russia (incl. tax Due Diligence);
- UAE and other countries of GCC;
- Kazakhstan, Belarus, Uzbekistan and other countries of the "near abroad";
- EU countries, Hong Kong, UK and USA



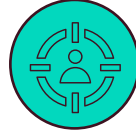
## Tax structuring and support of asset restructuring:

- creating of international holding, operational, financial and IP structures;
- increasing tax efficiency, including the application of tax incentives / regimes;
- optimization of the tax burden in cross-border payments



## International tax planning:

- tax planning in international corporate and personal structures;
- finding tax-efficient solutions for structuring international assets;
- analysis of tax consequences and risks in international structures and transactions



## Personal taxation:

- optimization of the tax burden on the income of business owners and assets;
- analysis of preferential personal tax regimes;
- analysis of CFC rules and preparation of reports;
- tax support for the restructuring of personal assets;
- preparation of personal tax reports

# Глоссарий

<b>Abbreviations</b>	<b>Transcript</b>
<b>ISTC</b>	Innovative scientific and technological center
<b>ITD</b>	Investment tax deduction
<b>Foreign agent</b>	Entity with foreign agent status
<b>IT</b>	Information technology
<b>CFC</b>	Controlled foreign company
<b>VAT</b>	Value added tax
<b>PIT</b>	Personal income tax
<b>OKVED</b>	All-Russian Classifier of Economic Activities

<b>Abbreviations</b>	<b>Transcript</b>
<b>EAEU</b>	Eurasian Economic Union
<b>EU</b>	European Union
<b>GCC</b>	Gulf Cooperation Council
<b>UAE</b>	United Arab Emirates
<b>UK</b>	United Kingdom
<b>USA</b>	United States of America

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