

MULTISERVICE PROVIDER



QUARTERLY REVIEW: Q4 2025

Significant legislative changes review

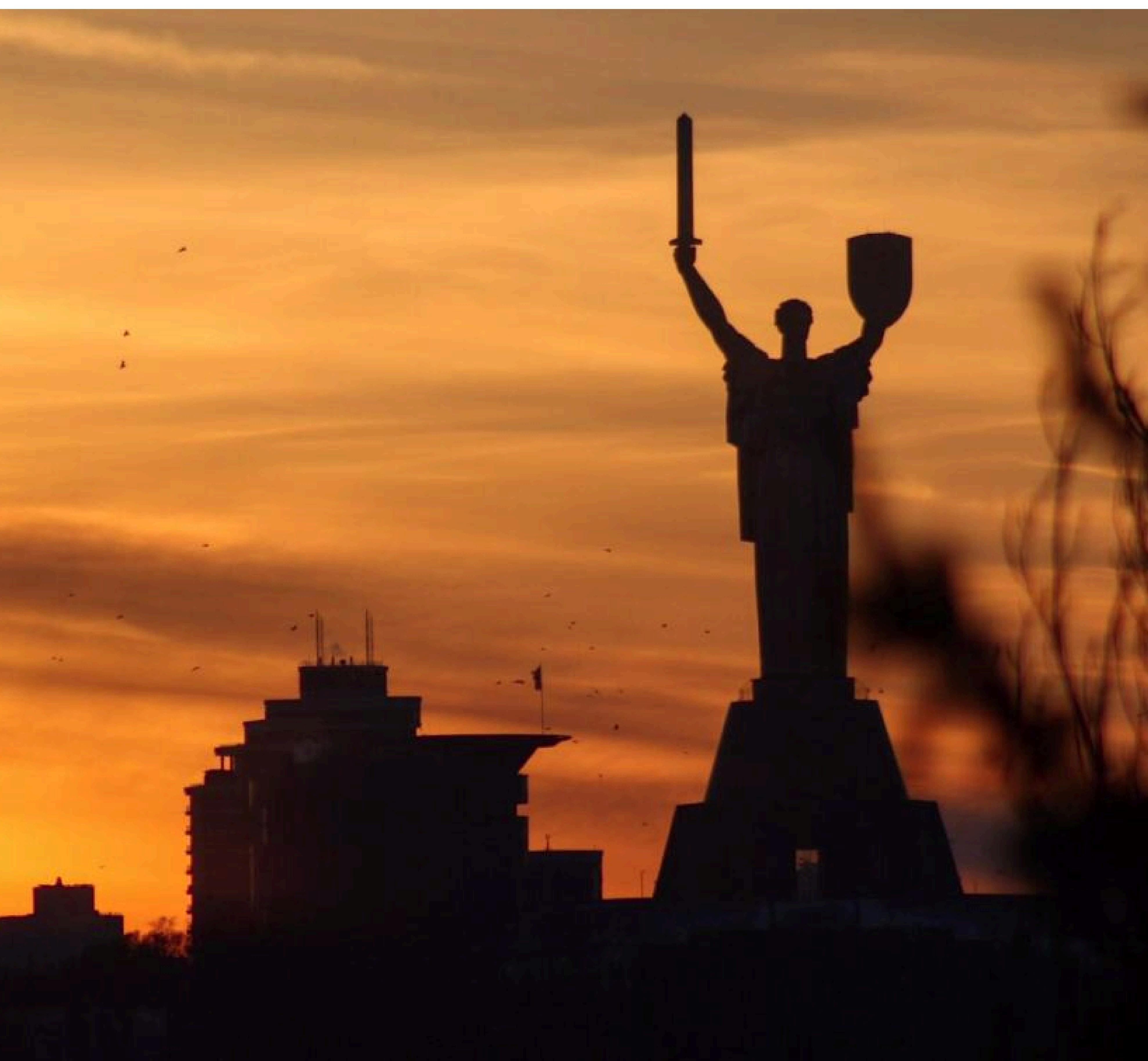


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01



MARTIAL LAW

What is a Military Occupational Specialty

A Military Occupational Specialty (MOS) is a military registration category that assigns service members and persons liable for military service to a specific military occupation and determines which branch of the armed forces they belong to

These categories reflect the practical skills and competencies that Ukrainian citizens have acquired to fulfil their constitutional duty to defend the nation.

The Ministry of Defence of Ukraine approves separate MOS lists for:

- ✓ enlisted personnel, non-commissioned officers and petty officers;
- ✓ commissioned officers.

Ukrainian citizens who have not served in the military are assigned their MOS when they register at Territorial Centres of Recruitment and Social Support (TRC and SS). Educational background, including diplomas and qualifications, is taken into account. For instance, someone with a junior or secondary medical qualification from civilian life would be assigned MOS-879 'Junior Medical Specialists'

Serving personnel can obtain a different or additional Military Occupational Specialty after completing the relevant training at military training units. Officers are assigned their MOS upon graduating from higher military educational institutions, military faculties at civilian higher education institutions, or through re-certification.

Upon conscription, all personnel without prior military service complete basic general military training. On completion, they receive MOS-100 'Rifleman'. They may then go on to specialist training to acquire an additional military specialty.

Each MOS has a numerical code, enabling automated military record-keeping. Code definitions are set out in separate regulatory documents for enlisted and commissioned officer personnel. This list is subject to change

Ukrainian citizens liable for military service can check their Military Occupational Specialty using the 'Reserve+' mobile app. For service members, the MOS is recorded in their military registration document and entered in their personal file.

Service members may hold more than one Military Occupational Specialty



02



ACCOUNTING AND TAXATION OUTSOURCING

Tax Changes in 2026: What is changing and for whom?



Law of Ukraine No. 4698-IX dated 03/12/2025 'On Amendments to the Tax Code of Ukraine and Other Laws of Ukraine Regarding Bank Corporate Income Tax in 2026 and Postponement of the Electronic Tracking System for Alcoholic Beverages, Tobacco Products and E-cigarette Liquids' came into force on 26/12/2025 (published on 25 December 2025 in the 'Holos Ukrayny' No. 248(500))

The Law introduces:

- ✓ a corporate income tax rate increase for banks to 50% for 2026
- ✓ postponement of the e-excise system launch until 1 November 2026;
- ✓ exemption of banks from tax agent duties in personal bankruptcy cases;
- ✓ extension of energy sector VAT exemptions until 1 January 2029;
- ✓ extension of VAT exemptions on UAVs, thermal imagers, anti-drone systems and other defence equipment until 1 January 2027

(this exemption is set out in para. 92 of subsection 2, section XX of the Tax Code of Ukraine. This covers drones (unmanned aerial vehicles), optical sights, collimator sights, night vision and thermal imaging sights, thermal binoculars, monoculars, binoculars, night vision devices and similar equipment.

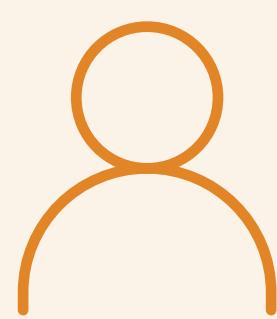
The complete list of exempt items appears in paras. 9-24 of section XXI of the Customs Code of Ukraine

- ✓ updated rules for the Territory of High Tax Trust (White Business Club);
- ✓ abolition of the single tax option for security services;
- ✓ abolition of the VAT exemption for electric vehicles;
- ✓ removal of the requirement to accrue compensating VAT liabilities for exempt transactions under subpara. 5, para. 32 of subsection 2, section XX of the Tax Code of Ukraine;

- ✓ amendments to the Law 'On Audit of Financial Statements and Auditing Activities'.

The Law came into force on 26/12/2025, with certain provisions taking effect from 01/01/2026.

Accounting Policy



Many businesses still mistakenly assume that establishing accounting policy is the accountant's job alone. In reality, under parts 2, 3 and para. 2 of part 5, Article 8 of the Law of Ukraine 'On Accounting and Financial Reporting in Ukraine' (hereinafter the Law on Accounting), it is the business owner or manager who bears responsibility for organising the accounting and approving the accounting policy.

If accounting is poorly organised or financial statements are prepared using flawed accounting policies, it is the manager who will be held liable. Responsibility only shifts partially to the accountant if the director has approved the accounting procedures and the accountant then breaches them..

From Accounting to Tax Records: What Has Changed

Accounting and tax records used to exist separately. Now, the corporate income tax base is derived from accounting data with tax adjustments (subpara. 134.1.1 of the Tax Code of Ukraine). This means that a company's accounting policy has a direct bearing on its financial result and corporate income tax liability.

Using a generic template from the internet is a risky approach that can lead to financial losses and regulatory challenges.

Key Points When Establishing Accounting Policy

When developing your accounting policy, consider:

- 1) your industry and business activities
- 2) the size of your enterprise;
- 3) whether an audit is mandatory;
- 4) national standards or IFRS requirements.

Approaches by entity type:

- ✓ public companies require detailed policies with mandatory disclosure in their financial statements;
- ✓ medium-sized enterprises undergoing annual audit need more detailed policies and comprehensive notes to their financial statements;
- ✓ small enterprises may use a simplified document, but it still needs to be up to date and not merely formal

Why 'Small Subsidiaries' Face More Problems

Medium-sized companies within international holding groups typically have robust accounting policies because these are approved by the parent entity. Small enterprises that are legally independent but effectively function as divisions of other companies, however, often lack a proper accounting policy or have only a token one.

More Enterprises Now Subject to Audit

With expanded audit requirements—including for Diiia City residents—auditors now begin their review by examining the accounting policy.

For IT companies, auditors pay close attention to revenue recognition (paras. 10-14 of National Accounting Standard 15) and how well it aligns with actual contracts.

The Key Principle of Accounting Policy

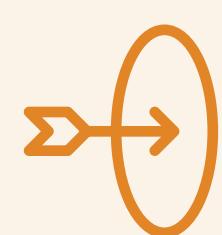
Where the National Accounting Standards offer alternative methods, your policy must clearly state which one the business has chosen. There is no point duplicating standard provisions where no alternatives exist.

Regulatory Framework

Beyond the Law on Accounting, you should also refer to the Methodological Recommendations on Enterprise Accounting Policy (Ministry of Finance Order No. 635 dated 27/06/2013).

Common Mistakes in Accounting Policy Preparation

- 1) No monetary threshold for distinguishing fixed assets from low-value non-current tangible assets => risk of additional tax charges due to incorrect depreciation
- 2) No residual value set for fixed assets => tax authorities may set their own and recalculate depreciation
- 3) No clear distinction between routine maintenance and capital repairs => confusion over expense recognition.
- 4) Depreciation methods listed but not applied => grounds for corporate income tax recalculation
- 5) Inventory valuation methods undefined => potential additional VAT and corporate income tax
- 6) Expense accounting method described incorrectly => distorted financial results.
- 7) No procedure for calculating foreign exchange differences => errors in foreign currency accounting
- 8) Internal documents overlooked (such as collective bargaining agreements) => no cross-references in the policy.
- 9) Materiality thresholds not defined => non-compliance with National Accounting Standard 1
- 10) Doubtful debt provisions not established (except where permitted by law).



Recommendations

- 1) Check annually whether the enterprise still meets its category criteria.
- 2) When applying National Accounting Standard 25, clearly specify which simplifications are being used.

Potential consequences of non-compliance:

- ✓ no defence in tax disputes or court proceedings;
- ✓ additional tax assessments and penalties;
- ✓ breach of the consistency principle;

- ✓ distorted financial results and dividend complications;
- ✓ problems when handing over to a new accountant;
- ✓ audit complications and extra costs.



The accounting policy is one of the cornerstones of tax and financial security for any business. It should be tailored to your business, reviewed annually, and treated as a practical working document.

Taxation of electric vehicle imports from 1 January 2026

From 1 January 2026, imports and domestic supplies will be subject to VAT—regardless of whether the vehicle was originally imported VAT-free or when ownership was registered.

Until 31 December 2025, an exemption applied: electric vehicles were not subject to VAT on import and supply within the customs territory of Ukraine.



03



PAYROLL OUTSOURCING

Key Figures from the Law of Ukraine 'On the State Budget of Ukraine for 2026' and Their Impact on Other Indicators



The Law of Ukraine 'On the State Budget of Ukraine for 2026' dated 3 December 2025

No. 4695-IX was officially published in the 'Holos Ukrayiny' No. 8769 on 12 December 2025.

Minimum Wage

The minimum wage from 1 January 2026, applicable throughout the year, is as follows:

- monthly: **UAH 8,647** (up UAH 647 from UAH 8,000 in 2025);
- hourly: **UAH 52** (up UAH 4 from UAH 48 in 2025).

The minimum wage figure used for calculating court-ordered payments remains at UAH 1,600.

Monthly Subsistence Minimum per Person

Main Demographic and Social Groups	Monthly Subsistence Minimum per Person from 1 January 2026
General Rate	UAH 3,209 (currently UAH 2,920)
Children under 6	UAH 2,817 (currently UAH 2,563)
Children aged 6 to 18	UAH 3,512 (currently UAH 3,196)
Working-age adults	UAH 3,328 (currently UAH 3,028)
Persons who have lost the ability to work	UAH 2,595 (currently UAH 2,361)

A separate provision states that the subsistence minimum for able-bodied persons used to calculate base salaries for judges, district prosecutors, officials of state bodies governed by special laws, other state employees, and tax and customs officers—is fixed at the level set for the relevant authority as of 31 December 2025.

In 2026, the guaranteed subsistence level for awarding benefits under the Law of Ukraine 'On State Social Assistance to Low-Income Families', expressed as a percentage of the subsistence minimum for different population groups, will be:

- ✓ for working-age adults – 60%;
- ✓ for those who have lost the ability to work and persons with disabilities – 100%
- ✓ for children – 145% of the applicable subsistence minimum

Minimum and Maximum Unified Social Contribution

- ✓ Minimum insurance contribution: UAH 1,902.34 (UAH 8,647 × 22%).
- ✓ Maximum assessable earnings (20 × minimum wage): UAH 172,940 (UAH 8,647 × 20).
- ✓ Maximum for service members and police (15 × minimum wage): UAH 129,705 (UAH 8,647 × 15)..

PIT-Free Domestic Daily Allowances

The maximum tax-free domestic daily allowance is UAH 864.70 (UAH 8,647 × 10%).

Single Tax Rates for Individual Entrepreneurs by Group

Group I single tax in 2026: UAH 332.80/month.

Group II single tax in 2026: UAH 1,729.40/month.

Military Levy for Groups I, II and IV Single Tax Payers

Military levy for Groups I, II and IV in 2026: UAH 864.70/month.

2026 Income Thresholds for Single Tax Payers

- ✓ Group I ($167 \times$ minimum wage): UAH 1,444,049;
- ✓ Group II ($834 \times$ minimum wage): UAH 7,211,598;
- ✓ Group III ($1,167 \times$ minimum wage): UAH 10,091,049.

These thresholds are fixed and remain unchanged throughout the year. They are locked in as of 01/01/2026.

How the Minimum Wage Rise Affects Remuneration

Sick pay and maternity benefit for those with less than 6 months' insurance in the past 12 months: minimum maternity benefit UAH 284.07, maximum maternity benefit UAH 568.13, and maximum sick pay UAH 284.07.

Salary threshold for employee reservation: UAH 21,617.50 (UAH 8,647 \times 2.5). In 2025 this figure was UAH 20,000 (UAH 8,000 \times 2.5).

Average Salary Requirement for Employee Reservation

Private enterprises seeking to obtain or retain 'critical importance' status must meet a mandatory criterion: the average salary accrued over the most recent calendar quarter must be at least 2.5 times the minimum wage (UAH 21,617.50 throughout 2026). Any employee being reserved, or already reserved, must also earn at least UAH 21,617.50 per month.

For employers in retail sale of alcohol, tobacco and fuel (both individuals and legal entities):

Businesses licensed for retail sale of alcoholic beverages, cider and perry (without added spirit), tobacco products, e-cigarette liquids or fuel must pay an average monthly salary of at least twice the minimum wage in force on 1 January of the reporting year (UAH 17,294 in 2026)

For businesses licensed for retail sale of alcoholic beverages, cider and perry (without added spirit), tobacco products, e-cigarette liquids or fuel whose retail outlets (including fuel stations) are all located outside regional administrative centres and the city of Kyiv and the city of Sevastopol at 50 km or more and with retail space up to 500 m², the average monthly salary must be at least 1.5 times the minimum wage (UAH 12,970.50 in 2026)

Salary indexation rules are reset in 2026.

Under Article 41 of the Law of Ukraine 'On the State Budget' for 2026, the consumer price index (CPI) for salary indexation will be calculated cumulatively starting from 1 January 2026.

January 2026 will serve as the base month, with CPI calculation commencing from February 2026.



Unified Reporting on USC, PIT and Military Levy: What Changes in 2026 and for Whom

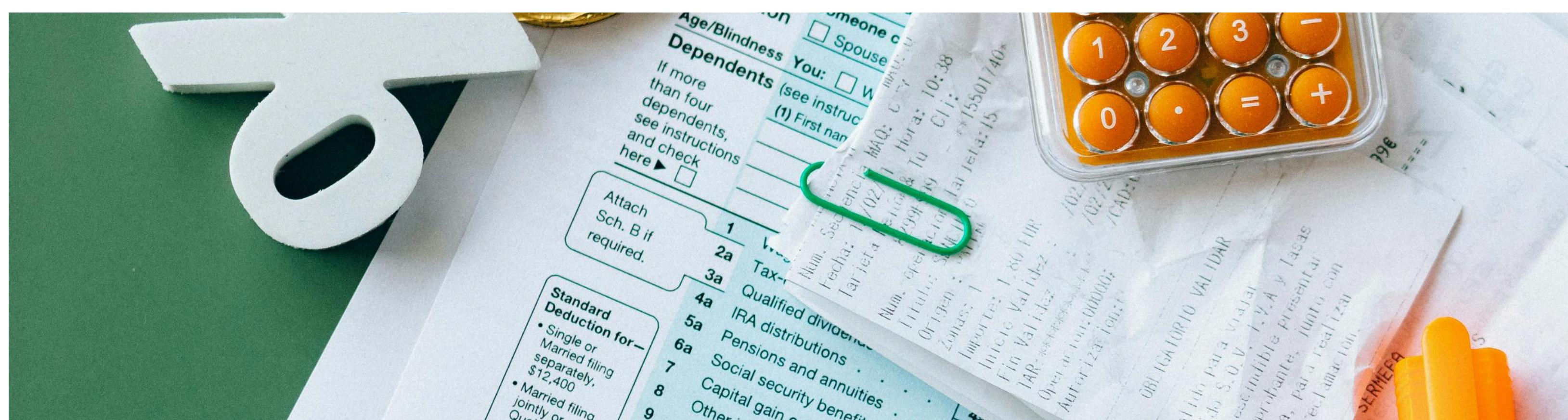
Under the Law of Ukraine 'On Amendments to the Tax Code of Ukraine and Other Legislative Acts in Connection with the Law "On Integrated Prevention and Control of Industrial Pollution" and to Improve Tax Legislation' dated 16/07/2025 No. 4536-IX (Law No. 4536), from 2026 individual entrepreneurs and self-employed tax agents must file unified USC, PIT and military levy reports quarterly rather than monthly as before.

Legal entities, meanwhile, will continue filing unified USC, PIT and military levy reports monthly.



Important! In January 2026, reporting for December 2025 (deadline 20 January 2026) must still use the old quarterly format.

For Q1 2026, the new rules apply: reporting is due by 10 May 2026. This pattern continues thereafter: quarterly reports are due within 40 days of the quarter's end.



04



HR CONSULTING

Employing Persons with Disabilities: Key Changes for Employers from 1 January 2026

From 2026, a disabled employee will only count towards the quota if three conditions are met: primary employment, salary above the minimum wage, and standard or adapted working hours. Financial penalties will be replaced by a targeted employment contribution.



From 1 January 2026, the Law of Ukraine 'On Amendments to Certain Legislative Acts Regarding the Right of Persons with Disabilities to Work' dated 15/01/2025 No. 4219-IX ([Law No. 4219-IX](#)) enters into force, bringing major changes to employment rules for persons with disabilities. The changes affect quota calculation, reporting and employer liability.

Employer – as defined in subpara. 14.1.222, para. 14.1, Article 14 of the Tax Code of Ukraine.

The Law introduces the following key changes:

Quarterly Calculation and Reporting

Employers must now calculate the disability employment quota quarterly rather than annually. Quota compliance reports will also be filed quarterly as part of tax returns.

New Workplace Quota

The quarterly quota is determined as follows:

- ✓ 1 position – for employers with **an average headcount of full-time employees** of 8 to 25.
- ✓ 4% of average headcount – for employers with more than 25 staff.
- ✓ 2% of average headcount – for healthcare facilities, rehabilitation centres, social service providers and organisations providing rehabilitation or training for persons with disabilities.

When Does an Employee Count Towards the Quota?

From 2026, an employee with a disability counts towards quota compliance only if all three conditions are met:

- 1) The job must be the employee's primary place of work.
- 2) Their accrued salary must exceed the minimum wage.
- 3) Working hours must meet standard or adapted duration requirements.

Introduction of the Targeted Contribution

Administrative and economic sanctions for failing to meet the quota are being replaced by a 'targeted contribution to support the employment of persons with disabilities'.

Key points:

- ✓ **Payers:** all employers who have failed to meet the quota, including public sector organisations, are required to pay.
- ✓ **Payment exemptions:** employers with an average headcount of full-time employees below 8, those who have met the quota, and diplomatic missions are exempt from the contribution.
- ✓ **Contribution amount:** calculated using a formula based on 40% of the average monthly salary, the number of months in the quarter, and the shortfall between the quota and the actual number of employed persons with disabilities. (During martial law, the contribution is set at 50% of the base rate.)

Administration and Liability

Administration: tax authorities are responsible for overseeing contribution accruals and payments.

Penalties for non-payment:

- 7% of the amount for late payment.
- 10% of the additionally assessed amount for additional assessments (capped at 50% of the amount).

Late payment penalty: a daily penalty of 0.1% of the underpayment will be charged on any arrears.

Reporting penalty: UAH 170 (10 tax-free minimum incomes) for failure to submit reports, late submission, or submission in an incorrect format.



These changes mean employers will need to review their HR processes and improve oversight of employment quota compliance.

New State Standard for equipping workplaces for persons with disabilities

The Ministry of Economy has approved the State Standard for Workplace Equipment (Arrangement) for Various Types of Functional Loss (hereinafter the State Standard) by Order dated 11/11/2025 No. 1265.

The State Standard sets out regulatory requirements for workplace equipment (arrangement) to accommodate various types of functional loss experienced by persons with disabilities, ensuring equal access to employment, productive work, and fair, favourable, safe and healthy working conditions.

The State Standard applies to:

- all employers who engage persons with disabilities;
- persons with disabilities.

Employers who engage persons with disabilities must provide them with proper working conditions and the socio-economic guarantees required by law, as well as implement additional occupational safety measures tailored to the needs of these employees.

Employers must:

- create and maintain proper working conditions for persons with disabilities in line with the State Standard requirements;
- assess workplace needs jointly with the person with a disability;
- provide reasonable accommodation in the workplace;
- provide occupational health and safety training, instruction and assessment for persons with disabilities, including on the use of specialised equipment, with an experienced employee assigned as a mentor during training, taking into account individual information perception needs;
- ensure proper maintenance of specialised equipment;
- cooperate with persons with disabilities and their representatives on workplace arrangement;
- ensure evacuation routes are clearly and visually marked, and use safety and health signs at work that employ directional signs, colours, light signals, acoustic signals, verbal communication or hand signals to prohibit dangerous actions, provide safety and health instructions, warn of risks or hazards, or require specific actions to protect employee safety and health;

- ⑤ provide staff training on respectful interaction with employees with disabilities during work processes, and on how to assist them with their tasks.

The State Standard also sets specific workplace equipment requirements for persons with disabilities, including those:

- 1) with musculoskeletal impairments;
- 2) with visual impairments;
- 3) with hearing impairments;
- 4) with limb loss;
- 5) with internal diseases (chronic conditions);
- 6) with mental or intellectual impairments.

This Order enters into force on the date Law of Ukraine dated 15/01/2025 No. 4219-IX 'On Amendments to Certain Legislative Acts of Ukraine Regarding Ensuring the Right of Persons with Disabilities to Work' enters into force (Law No. 4219-IX enters into force on 01/01/2026), but not before the Order's official publication.



New Deadlines for Hiring and Dismissal Notifications from 1 January 2026

The procedure for notifying the State Tax Service about new hires remains unchanged in 2026!

Recruitment and dismissal must also be reported via Annexes 5 and 4 DF to the unified PIT, military levy and USC reporting.

Under subpara. 70.16.1 of the Tax Code of Ukraine, from 1 January 2026 information on hiring or dismissing employees must be submitted:

- ✓ by legal entities, government bodies and tax agents – within 20 calendar days following the reporting month;
- ✓ by individual entrepreneurs and self-employed persons – within 40 calendar days following the reporting quarter.

Employment Contracts: Mandatory Details

The employment contract must include:

- ✓ job function (position);
- ✓ remuneration;
- ✓ place of work;
- ✓ start date.

Before work begins, the employer must **notify** the employee in a mutually agreed manner about:

- ✓ place of work (employer details, including location), job function (position and duties), and start date;
- ✓ designated workplace and provision of necessary equipment;
- ✓ rights and obligations, working conditions, and any hazardous or harmful workplace factors,
- ✓ internal labour regulations
- ✓ health and safety briefings, industrial sanitation, workplace hygiene and fire safety training;
- ✓ annual leave entitlement, pay terms and rates, etc.



05



LEGAL CONSULTING

Multiple Citizenship Law Enters into Force on 16 January 2026

The Law of Ukraine 'On Amendments to Certain Laws of Ukraine Regarding Ensuring the Exercise of the Right to Acquire and Retain Ukrainian Citizenship' (the Multiple Citizenship Law) gives Ukrainians:

- ✓ the ability to hold foreign citizenship without the risk of losing Ukrainian citizenship, provided that citizenship was acquired from a country on the government-approved list
- ✓ the right to officially acquire citizenship of another country without having to renounce Ukrainian citizenship, provided that country is on the government list.

The law enters into force on 16 January 2026.



06



TRANSFER PRICING

Transfer Pricing Updates

Transfer pricing changes for controlled transactions in commodity goods (grain, ore, oil, etc.) have been in effect since 1 October 2025 (the first day of the month following publication of [Law of Ukraine dated 16/07/2025 No. 4536-IX 'On Amendments to the Tax Code of Ukraine and Other Legislative Acts of Ukraine in Connection with the Adoption of the Law of Ukraine "On Integrated Prevention and Control of Industrial Pollution" and for the Purpose of Improving Certain Provisions of Tax Legislation'](#) (Law No. 4536))

Legislators have made a small but crucial clarification regarding past periods – [subsection 10 of section XX of the Tax Code of Ukraine](#) now includes a new paragraph 75, which reads:

‘75. The term “quoted prices” as defined in [subparagraph 14.1.94-1](#) of paragraph 14.1, Article 14 of this Code applies for the purposes of [subparagraph 39.3.3.4](#) of subparagraph 39.3.3, paragraph 39.3 and [subparagraph “b” of subparagraph 39.5.3.1](#) of subparagraph 39.5.3, paragraph 39.5, Article 39 of this Code for tax periods from 1 January 2021 onwards’.

What was the issue?

Special rules for controlling commodity goods prices were introduced into the Tax Code of Ukraine some time ago. Central to these rules is the concept of ‘**quoted prices**’ – market prices from international exchanges and authoritative pricing agencies, used as benchmarks.

However, it was unclear exactly from which period these rules, including the term ‘quoted prices’, should apply. This created grounds for disputes with tax authorities during audits covering prior years.

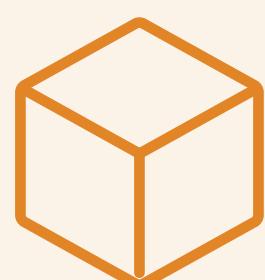
What has changed?

Law No. 4536 has resolved this issue by adding new paragraph 75 to subsection 10 of section XX of the Tax Code.

This paragraph explicitly states that the term 'quoted prices' and all related rules apply to tax periods **from 1 January 2021 onwards**.

What does this mean in practice?

- 1) Who this is relevant for:** Companies exporting or importing commodity goods (from the Cabinet of Ministers-approved list) in controlled transactions.
- 2) Retrospective application:** The amendment confirms that for 2021, 2022, 2023 and subsequent years, businesses were and remain required to justify commodity goods transaction prices by comparing them with exchange (quoted) prices. **This is the priority transfer pricing method.**
- 3) Legal certainty:** this provision establishes clear legal grounds for transfer pricing audits covering periods from 2021. There is now no room for alternative interpretation. Businesses that justified prices during this period using quoted prices did so correctly.



Essentially, this is not a new requirement but official codification of established practice. This change benefits taxpayers by eliminating legal uncertainty and reducing the risk of disputes with regulatory authorities over past reporting periods.

07



FINANCIAL AUDIT

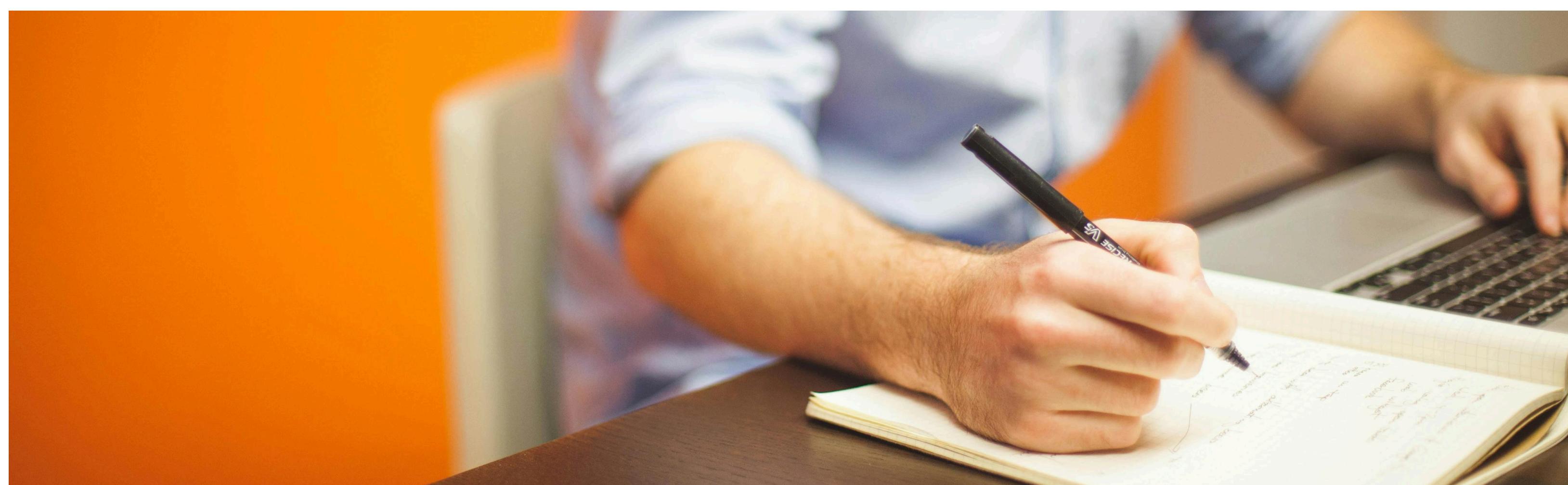
Unified Format – XBRL: Updated Requirements for Financial Reporting Submission Procedures Approved

The National Securities and Stock Market Commission (NSSMC) has established XBRL as the single mandatory format for all enterprises preparing financial statements under international standards, with submission to the Financial Reporting Collection Centre. These changes take effect from 01/11/2025

The document was first published for consultation with professional market participants. All proposals were carefully reviewed, with most being incorporated.

Extensive preparatory work on NSSMC regulatory amendments, including through specialised committee meetings, preceded the Commission's approval. This work resulted in broad support for the document from UAIB, OSNAP, ACU, FIMÁ, UEB, UTP and other capital market participants.

The document eliminates the XML financial reporting requirement and establishes a single mandatory format: international standards-based financial statements must be submitted exclusively in XBRL format through the Financial Reporting Collection Centre (FRCC).



Amendments to National Accounting Standard 26 'Employee Benefits'



The Ministry of Finance has amended National Accounting Standard 26 'Employee Benefits' by Order dated 01/12/2025 No. 604 (registered with the Ministry of Justice on 03/12/2025 under No. 1809/45215).

The new rules came into force on 23 December 2025.

The amendments align National Accounting Standard 26 'Employee Benefits' with IFRS, specifically the IFRS for SMEs and IAS 19 'Employee Benefits'.

The amendments clarify that National Accounting Standard 26 establishes the methodology for recording in accounting information on benefits (cash and non-cash) for work performed and/or services rendered by employees, and their disclosure in financial statements.

Work performed and/or services rendered by an employee means the fulfilment of duties under an agreement with the enterprise.

Employee benefits comprise all forms of payments and compensation provided by an enterprise in exchange for work performed and/or services rendered by employees, or upon termination.

Current employee benefits include:

- wages at salary grades and tariffs, and other payroll costs

- ✓ payments for time not worked (annual leave and other paid absences);
- ✓ bonuses and other incentive payments due within twelve months after the period in which employees perform the work and/or render services, etc.;
- ✓ non-monetary benefits (healthcare, housing and/or vehicles and/or services provided to employees free of charge under legislation, etc.).

Accrued employee benefits for work performed and/or services rendered during the reporting period, along with accrued USC, are recognised as current liabilities and expenses of the reporting period when the work was performed and/or services rendered, unless other National Accounting Standards require inclusion in asset cost.

If the amount paid exceeds the liability from work performed and/or services rendered up to the reporting date, the excess is recognised as an asset to the extent it will reduce future benefits and/or compensation.

Post-employment Benefits

Liabilities and assets related to post-employment benefits are accounted for separately under each post-employment benefit plan.

Post-employment benefit plans are classified as either defined contribution plans or defined benefit plans based on their principal terms and conditions

Contributions accrued under a defined contribution plan are recognised as a current liability and expense in the period when employees performed the work and/or rendered services, unless other National Accounting Standards require inclusion in asset cost.

If contributions already paid exceed those due for work performed and/or services rendered up to the reporting date, the excess is recognised as an asset

Gains (losses) from curtailment or settlement of a defined benefit plan equal the sum of changes in the present value of plan obligations, changes in the fair value of plan assets, unrecognised actuarial gains (net of unrecognised actuarial losses), and the unrecognised cost of prior employee service

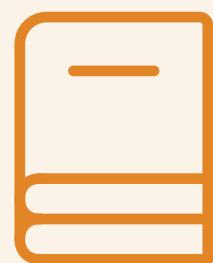
Settlement of a defined benefit plan occurs when plan amendments or curtailment result in termination of the plan. If a terminating defined benefit plan is replaced by one with similar terms, no settlement of the original plan occurs.

Disclosure of Employee Benefits in the Notes to Financial Statements

The Notes to Financial Statements must disclose the following for each category of other long-term benefits and termination benefits:

- ✓ nature of the benefits
- ✓ amount of the liability
- ✓ level of funding at the reporting date

Effective from 23/12/2025



The Order came into force on 23/12/2025, the date of official publication. It was published in the Official Gazette of Ukraine on 23/12/2025

08



IT CONSULTING

24/10/2025. BAS Small Business (Basic, PROF). Release 2.0.1.3 is now available.

What's new:

- ✓ Bug fixes and minor improvements

04/11/2025. BAS AGRO. ERP, edition 2.5. Release 2.5.14.1 is now available.

What's new:

- ✓ Aligned with release 2.5.14 of 'BAS ERP, edition 2.5'

05/11/2025. Agricultural Enterprise Management for Ukraine. Release 1.3.89.1 is now available.

- ✓ Aligned with release 1.3.89 of 'Manufacturing Enterprise Management for Ukraine, edition 1.3'

22/11/2025. The 'VAT Declaration' external report has been published on the ITS portal's 'Software Updates' service for the following configurations:

- ✓ BAS Trade Enterprise Management, version 1.2.78.2
- ✓ Trade Enterprise Management for Ukraine, edition 1.2, version 1.2.78.1
- ✓ Manufacturing Enterprise Management for Ukraine, edition 1.3, version 1.3.89.1

19/11/2025. BAS AGRO. Integrated Enterprise Management, edition 2.5. Release 2.5.16.4 is now available

25–27/11/2025. BAS Accounting (Basic, PROF, CORP). Release 2.1.32.1 is now available

27/11/2025. BAS ERP, edition 2.1. Release 2.1.40.3 is now available.

BAS Integrated Enterprise Management, edition 2.1. Release 2.1.40.3 is now available.

BAS Real Estate Management PROF. Release 2.1.33.1 is now available.

01/12/2025. BAS Construction. Financial Management. Release 2.1.29.1 is now available.

BAS Real Estate Management CORP. Release 2.1.33.1 is now available.

BAS ERP, edition 2.5. Release 2.5.17.4 is now available.

02/12/2025. BAS Integrated Enterprise Management, edition 2.5. Release 2.5.17.4 is now available.

03/12/2025. BAS Payroll and HR Management (Basic, PROF). Release 3.0.8.3 is now available.

04/12/2025. BAS Trade Enterprise Management. Release 1.2.79.2 is now available.

05/12/2025. BAS Trade Management, edition 3.2. Release 3.2.40.3 is now available.

08/12/2025. BAS Holding Management, edition 2.0. Release 2.0.30.1 is now available.

'External Rules for Standard Exchange between "BAS Small Business" version 2.0.1.3 and "BAS Accounting" version 2.1.32.1' published in 'BAS Small Business PROF' configuration updates, version 2.0.1.3.

10/12/2025. Agricultural Enterprise Management for Ukraine, edition 1.3. Release 1.3.90.1 is now available.

11/12/2025. BAS Trade Management, edition 3.5. Release 3.5.17.4 is now available.

18/12/2025. BAS AGRO. Accounting. Release 2.1.40.1 is now available.
BAS AGRO. Accounting for Grain Elevators, Mills and Feed Mills. Release 2.1.40.1 is now available.

23/12/2025. BAS AGRO. Integrated Enterprise Management, edition 2.5. Release 2.5.17.4 is now available.

29/12/2025. BAS Construction ERP, edition 2.5. Release 2.5.17.5 is now available.

Release highlights:

- 1) Data Synchronisation (Applicable to: BAS Accounting (Basic, CORP) version 2.1.32.1; BAS Real Estate Management PROF/CORP version 2.1.33.1; BAS Construction. Financial Management version 2.1.29.1; BAS Holding Management version 2.0.30.1)
- ✓ Exchange rules with BAS Small Business updated to edition 2.0.

2) Non-current Assets (Applicable to: BAS ERP version 2.1.40.3; BAS Integrated Enterprise Management version 2.1.40.3; BAS Integrated Enterprise Management version 2.5.17.4; BAS AGRO Integrated Enterprise Management version 2.5.17; BAS ERP version 2.5.17)

- ✓ Partial Disposal of Fixed Assets
 - Partial fixed asset disposal functionality implemented.

3) Payroll and HR (Applicable to: BAS AGRO. Integrated Enterprise Management edition 2.5.16; BAS ERP version 2.1.40; BAS Integrated Enterprise Management version 2.1.40; BAS Accounting CORP version 2.1.32; BAS Real Estate Management CORP version 2.1.33; BAS Integrated Enterprise Management version 2.5.17.4; BAS Payroll and HR Management (Basic, PROF) version 3.0.8.3; Manufacturing Enterprise Management for Ukraine version 1.3.90.1; Trade Enterprise Management for Ukraine version 1.2.79.1; BAS Trade Enterprise Management version 1.2.79.2; BAS Holding Management version 2.0.30.1; BAS AGRO. Accounting version 2.1.40.1; BAS AGRO. Accounting for Grain Elevators, Mills and Feed Mills version 2.1.40.1; BAS AGRO. Integrated Enterprise Management edition 2.5.17.4; BAS ERP version 2.5.17.4; BAS Construction ERP version 2.5.17.5)

- ✓ Military Registration
 - Personal Military Registration Lists can now be generated in accordance with Cabinet of Ministers of Ukraine Resolution No. 916 of 30 July 2025.
- ✓ Social insurance benefit calculations
 - Printed forms for 'Social Insurance Application-Calculation' and 'Confirmation of Social Insurance Payments' documents can now be generated in accordance with Pension Fund of Ukraine Resolution No. 28-1 of 19 August 2025.
- ✓ Annual leave provision
 - The 'Accrual of Estimated Leave Liabilities' document now includes the option to generate the 'Provision Calculation Certificate' printed form.
 - Two new reports have been added: 'Annual Leave Provision Calculation Certificate' and 'Annual Leave Provision Balances and Movements'.

4) Regulatory Reporting (Only for configurations: BAS AGRO. Integrated Enterprise Management, edition 2.5.16.4; BAS Accounting (Basic, CORP) version 2.1.32.1; BAS ERP version 2.1.40.3; BAS Integrated Enterprise Management version 2.1.40.3; BAS Real Estate Management CORP version 2.1.33.1; BAS Construction. Financial Management, version 2.1.29.1; BAS Integrated Enterprise Management, version 2.5.17.4; BAS Payroll and HR Management (Basic, PROF), version 3.0.8.3; Manufacturing Enterprise Management for Ukraine version 1.3.90.1; Trade Enterprise Management for Ukraine version 1.2.79.1; BAS Trade Enterprise Management version 1.2.79.2; BAS Holding Management version 2.0.30.1; BAS AGRO. Accounting version 2.1.40.1; BAS AGRO. Accounting for Grain Elevators, Mills and Feed Mills version 2.1.40.1; BAS AGRO. Integrated Enterprise Management edition 2.5.17.4; BAS ERP version 2.5.17.4; BAS Construction ERP version 2.5.17.5)

 Profit declaration

- A new 'Profit Declaration' regulatory report form has been introduced pursuant to Ministry of Finance of Ukraine Order No. 215 of 24/04/2025.

 Excise duty declaration

- A new 'Excise Duty Declaration' regulatory report form has been introduced pursuant to Ministry of Finance of Ukraine Order No. 291 of 05/06/2025.

5) Fixed Assets (Only for configuration: BAS AGRO. Integrated Enterprise Management, edition 2.5. release 2.5.16.4)

 Printed forms

- Fixed assets printed forms approved under Ministry of Finance of Ukraine Order No. 818 of 13/09/2016 have been added.
- These forms are mandatory for budget fund administrators. Enterprises of any organisational, legal, or ownership type may use these forms at their discretion.

6) Crop Production (Only for configuration: BAS AGRO. Integrated Enterprise Management, edition 2.5. release 2.5.16.4)

 Threshing floor

- Use the 'Entry of Opening Balances for Threshing Floor' document to enter opening material balances at the threshing floor.

- The 'Threshing Floor Weighing' document tracks material movements at the threshing floor. The document supports the following operation types: 'Harvest from Field', 'Grain Receipt', 'Internal Threshing Floor Transfer', and 'Sale from Threshing Floor'.
- The 'Threshing Floor Trial Balance' report enables analysis of material movements and balances for a selected period.

7) Livestock Farming (Only for configuration: BAS AGRO. Integrated Enterprise Management, edition 2.5. release 2.5.16.4)

- ✓ Milk accounting
 - The 'Milk Yield' report displays milk yield data drawn from the 'Milk Yield' document.
 - The 'Milk Sale' document records milk shipments in the system.
 - The 'Milk Transfer' document records milk movements between storage locations (farms/warehouses).
 - The 'Milk Write-off' document records the write-off of dairy products.

8) Other (Only for configurations: BAS Small Business (Basic, PROF), version 2.0.1.3; BAS Trade Management versions 3.2.40.3 and 3.5.17.4)

- ✓ Minor bug fixes and improvements.

03/12/2025. Manufacturing Enterprise Management for Ukraine, version 1.3. New release 1.3.90.1 has been issued.

Trade Enterprise Management for Ukraine, version 1.2. New release 1.2.79.1 has been issued.

Release highlights:

1) Payroll and Personnel

- ✓ Military registration
 - Personal Military Registration Lists can now be generated incorporating amendments from Cabinet of Ministers of Ukraine Resolution No. 916 of 30 July 2025.
- ✓ Social benefit calculations
 - Printed forms for 'Social Insurance Fund Application-Calculation' and 'Social Insurance Fund Payment Confirmation' documents can now be generated incorporating amendments from Pension Fund of Ukraine Resolution No. 28-1 of 19 August 2025.

4) Regulated reporting

✓ Income declaration

- A new 'Profit Declaration' regulated report form has been introduced pursuant to Ministry of Finance of Ukraine Order No. 215 of 24/04/2025.

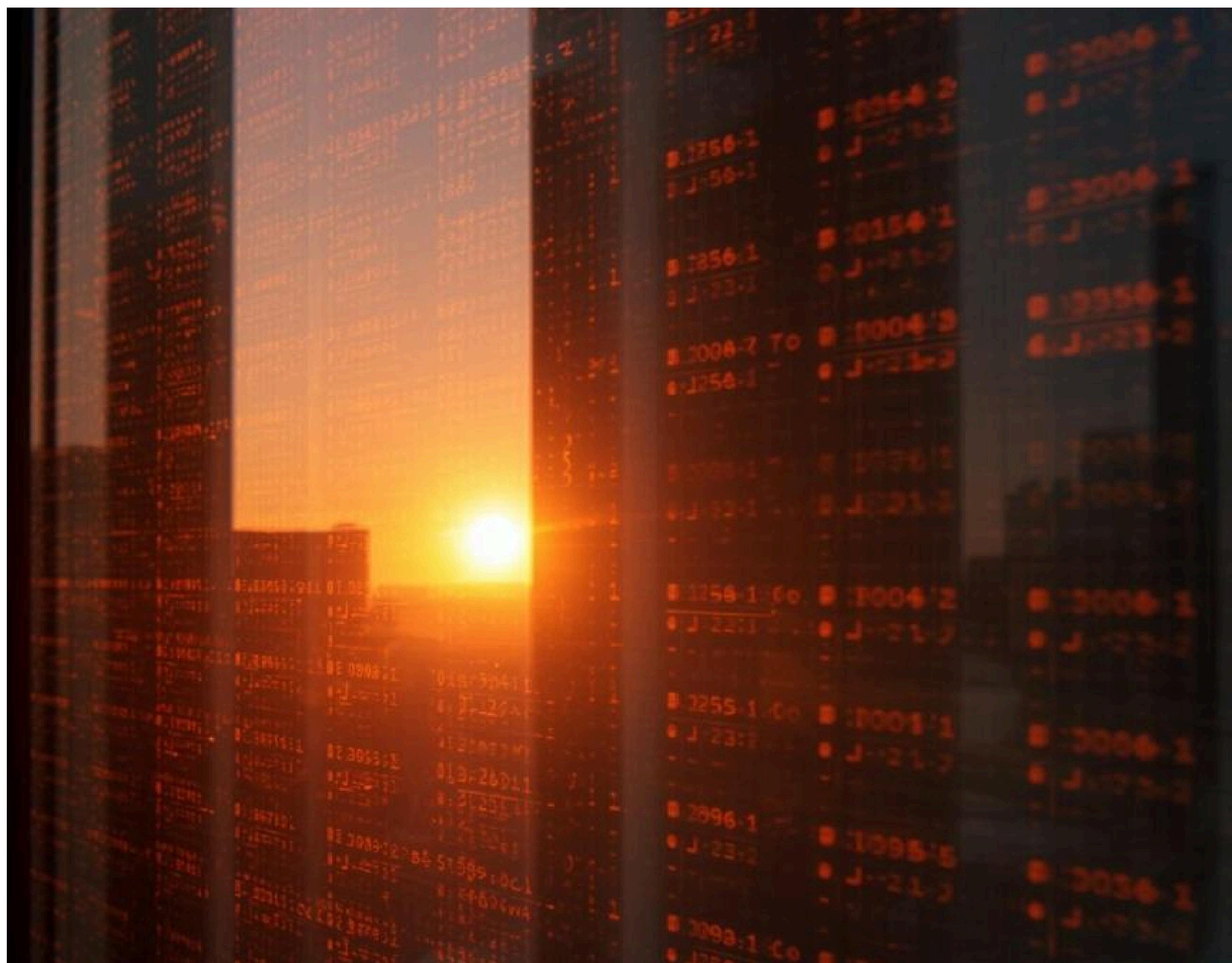
✓ Excise duty declaration

- A new 'Excise Duty Declaration' regulated report form has been introduced pursuant to Ministry of Finance of Ukraine Order No. 291 of 05/06/2025.

23/12/2025. BAS AGRO. ERP, edition 2.5. New release 2.5.15.1 has been issued.

What's new:

- 1) The product has been aligned with release 2.5.17 of 'BAS ERP, edition 2.5'.



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