



INFORMATION

There is a new act on collective labour agreements and collective arrangements

The introduction of an electronic National Register of Collective Labour Agreements, in which the Minister of Labour will not verify the content of notifications for compliance with the law, and the expansion of the catalogue of cases to include issues related to work-life balance are the most important changes in the new Act on Collective Labour Agreements and Collective Arrangements.

A collective labour agreement specifies the conditions that should be met by the content of employment relationships or other legal relationships that are the basis for performing paid work – as provided for in the new Act of 5 November 2025 on Collective Labour Agreements and Collective Arrangements. A collective labour agreement may specify matters not regulated by the provisions of labour law in a mandatory manner, while maintaining the principle that the provisions of the agreement cannot be less favourable to employees than the provisions of labour law.

The list of issues that may be covered by a collective labour agreement has been significantly expanded. In addition to traditional issues related to working time, work systems, remuneration and leave, the Act also mentions issues related to reconciling work and private life, age management and active ageing, counteracting violations of dignity and mobbing, psychosocial risks, as well as conducting social dialogue.

One of the most important changes is the introduction of the electronic National Register of Collective Labour Agreements, known as KEUZP, kept in an IT system by the minister responsible for labour. The notification must be accompanied by a qualified electronic signature, a trusted signature or signed in another way accepted by the KEUZP system. Importantly, the minister does not verify the content of the notification in terms of compliance with the labour law, which is a significant difference compared to the current registration system. The collective agreement comes into force on the date specified therein, but not earlier than on the date of proper notification to KEUZP.

The minister will have two years to create a new register. Until it is established, the obligation to report information is fulfilled by submitting an electronic notification together with a digital representation of the content of the agreement to

the minister responsible for labour matters. Collective labour agreements concluded before the entry into force of the new Act remain in force until the expiry of the notice period, termination or validity of such an agreement.

The Act precisely defines the entities entitled to negotiate the conclusion of agreements. In the case of company collective labour agreements, these are the employer and company or inter-company trade unions. Multi-enterprise collective labour agreements may be concluded by employers' organisations, at least two employers or multi-enterprise trade union organisations. A significant facilitation is the provision that allows for the conclusion of a multi-employer collective labour agreement by at least two employers without the need to involve employers' organisations. Each party is obliged to conduct negotiations in good faith, respecting the legitimate interests of the other party, taking into account demands justified by the economic situation of the employer and refraining from making demands that clearly exceed the financial capabilities of the employer.

A novelty can be found in Article 11(2) of the Act which introduces the possibility of using the assistance of a mediator at the stage of negotiations on concluding a collective labour agreement. The mediator's task is to help the parties reach an agreement on the content of the agreement. The provisions of the Act on the Resolution of Collective Disputes regarding mediation will apply accordingly. A collective labour agreement may be concluded for either a definite or indefinite period. Before the expiry of the term of an agreement concluded for a definite period, the parties may decide to extend its term for a fixed or indefinite period. The notice period for a collective labour agreement is 3 months, unless the parties agree otherwise.

The Act introduces the possibility of filing a petition with a labour court to determine whether the content of a collective labour agreement is consistent with the labour law or whether the agreement was concluded in accordance with the regulations regarding its conclusion. Such a petition may be submitted by an employee, a person performing paid work other than an employee, a pensioner, a disability pensioner, a trade union, an employer covered by the provisions of an agreement as well as a labour inspector or a prosecutor. Submitting the petition does not suspend the entry into force or application of the collective labour agreement.



The bill on Personal Investment Accounts has been published

The Minister of Finance and Economy presented to the Council of Ministers a bill (form UD296) concerning the introduction of a new product into the Polish financial system – Personal Investment Accounts (OKI). The project aims to strengthen the capital market and increase household participation in long-term investments.

OKIs are investment accounts that can be opened in banks, brokerage houses, investment funds, insurance companies and voluntary pension funds. The product is based on the Swedish *Investeringssparkonto* (ISK) model, considered one of the most tax-efficient and accessible investment systems in the EU. Individual investors, after reaching the age of majority, will be able to accumulate assets in the form of cash, Treasury bonds, shares listed on the Stock Exchange or alternative trading systems, investment fund units and financial instruments excluded from speculative purposes.

According to the bill, the agreement for operating an OKI can be concluded in electronic or paper form, with full freedom of deposits and withdrawals without the need to freeze funds. The number of accounts that can be opened has been legally limited: in 2026-2027, an investor will only be able to have one OKI. However, from 2028 it will be possible to have multiple accounts. Additionally, a transfer payment mechanism has been introduced, ensuring the smooth transfer of assets between institutions without the burden of income tax.

OKI taxation will be implemented in the form of a new tax on the value of assets, the rate of which will be 1.9% of the annual NBP reference rate (with the minimum rate being 0.1%). In the first year of application – 2026 – the tax will be charged proportionally (approx. 0.85%) for half a year. The tax base will be the annual average value of assets accumulated in the account, calculated taking into account daily valuations and adjustments for deposits and withdrawals. Tax exemptions are also

provided – up to PLN 12,500 for savings assets (e.g. deposits, treasury bonds) and up to PLN 50,000 for investment assets (shares, regulated funds). The total exemption limit in the first year of validity will be PLN 50,000.

Financial institutions will be obliged to submit monthly and annual information to the e-Tax Office, and investors will be obliged to submit annual tax returns and pay the tax due. The Polish Financial Supervision Authority will be responsible for supervising OKI, which will also prevent unauthorised use of the product name – sanctions of up to one million PLN are foreseen for violations.

The act is to enter into force on 1 July 2026.



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New definition and protection against mobbing in the Labour Code

The Standing Committee of the Council of Ministers has adopted a bill that will simplify the definition of mobbing and strengthen the protection of employees against undesirable actions at work. The new definition highlights the repetitive nature of mobbing, covers physical, verbal and non-verbal actions, and is independent of the perpetrator's intentions. The bill also provides for protection against false accusations and raises the minimum compensation to six times the minimum wage. The bill also imposes the obligation to define rules for counteracting mobbing and discrimination in work regulations. The court is to assess all violations of an employee's personal rights in one proceeding, and the employer will be exempt from liability if the mobbing does not originate from a superior and effective preventive measures have been implemented.

The National Labour Inspectorate creates a checklist for choosing a contract – full-time or mandate

The National Labour Inspectorate is preparing a checklist with questions to help entrepreneurs determine whether an employment contract or a civil law contract should be concluded in a given case, announced the Chief Labour Inspector. The list will be created in cooperation with employer organisations and trade unions, taking into account industries and the number of employees. The tool will make it easier for inspec-

tors to assess contracts before possible retraining and will help employers and employees operate according to uniform criteria.

Annual reduction of the basis for calculating ZUS contributions for 2026 announced

Pursuant to the announcement of the Minister of Family, Labor and Social Policy of 19 November 2025 (M.P. item 1206), the annual basis for calculating contributions for retirement and disability insurance in 2026 will be limited to PLN 282,600. This amount is based on the projected average monthly salary in the national economy, which is PLN 9,420 gross. The provisions of the Act on the Social Insurance System limit the basis for calculating contributions to thirty times this remuneration. If the limit is exceeded during the year, this period is treated as an insurance period. For comparison, the limit for 2025 was PLN 260,190 with a forecast salary of PLN 8,673. Details available in Monitor Polski.

The limit for IKE contributions in 2026 will be PLN 28,260.

Pursuant to the announcement of the Minister of Family, Labor and Social Policy of 17 November 2025 (M.P. item 1202), the maximum amount of payments to an Individual Retirement Account (IKE) in 2026 is PLN 28,260. This limit corresponds to three times the forecast average gross monthly salary in the national economy, set at PLN 9,420 in accordance with the draft



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budget act. The provision of Article 13(1) of the Act on IKE and IKE ZEM limits annual contributions to this amount. For comparison, in 2025 the limit was PLN 26,019 (announcement of 10 December 2024, M.P. 1053). Details in the Polish Monitor.

The large ZUS will increase by PLN 153 per month in 2026

Entrepreneurs in the large ZUS will pay higher social security contributions in 2026 - the assessment basis will increase from PLN 5,203.80 to PLN 5,652 per month (60% of the forecasted average salary of PLN 9,420 gross according to the announcement of the Ministry of Family, Labour and Social Policy of 19 November 2025, M.P. item 1206). Total contributions with sickness, Labour Fund and Solidarity Fund will amount to PLN 1,926.76 per month (+PLN 152.80) and PLN 23,121.12 per year (+PLN 1,833.60) compared to 2025. (PLN 1,773.96/month, PLN 21,287.52/year). Higher ZUS applies to persons conducting non-agricultural business activity (including shareholders/partners in companies/partnerships, creators, artists), excluding the preferential Small ZUS (first 24 months) and Small ZUS Plus (up to 36 months with revenues up to PLN 120,000/year). The accident insurance contribution (1.67% for <10 insured persons) is PLN 94.39 (+ PLN 7.49); retirement pension PLN 1,103.27 (+ PLN 87.49); disability pension PLN 452.16 (+ PLN 35.86); sickness benefit PLN 138.47 (+ PLN 10.98). The Labour Fund and Solidarity Fund rate remains at 2.45%. ZUS will notify about the accident insurance by 20 April; the guide is available on the ZUS website.

From 2026, business registration will be online only

The Council of Ministers has adopted a bill amending the Act on the Central Registration and Information on Business (CEIDG) and the Entrepreneur Information Point, which assumes the digitization and simplification of the business registration procedures. From 2026, applications for business registration will be submitted exclusively electronically, including via the mObywatel application. The bill introduces an improvement to the CEIDG "one-stop shop", enabling the completion of many formalities with one application and automatic exchange of data between offices (ZUS, US, GUS). Information on civil law partnerships will be published in CEIDG, and from 2028 it will be possible to submit all applications using a single online form. The new regulations are to enter into force 6 months after their publication in the Journal of Laws.

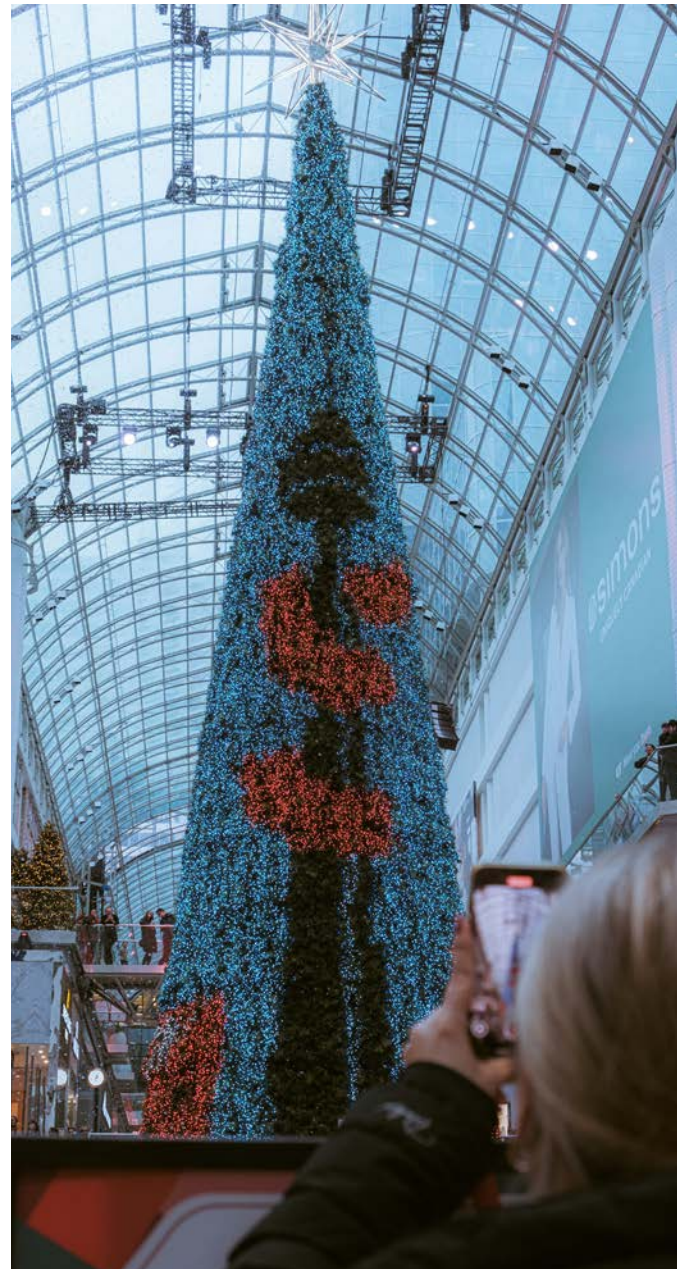
Christmas Eve a day off – work can result in a fine of up to PLN 100,000

From 2025, Christmas Eve will become the 14th public holiday, which means a ban on making employees work on 24 December, the National Labour Inspectorate reminds. An employer who violates this prohibition commits an offense punishable by a fine ranging from PLN 1,000 to PLN 30,000, and in the case of trade, the fine may even increase to PLN 100,000. Exceptions to the ban on working on Christmas Eve include, among

others, rescue operations, continuous traffic, transport, health care, trading at petrol stations and the work of entrepreneurs conducting business in person. Employees forced to work on this day are entitled to a day off in lieu, no later than the end of the settlement period.

The CJEU partially annulled the provisions of the Minimum Wage Directive

The Court of Justice of the EU has annulled part of the provisions of Directive 2022/2041 concerning the establishment of criteria for the adequacy of minimum wages, finding that the Union had exceeded its competences – according to the ruling of 11 November 2025 in case C-19/23. The Court invalidated



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Article 5(2) which required Member States to take into account criteria such as purchasing power, productivity levels and the rate of wage growth, and the part of Article 5(3) prohibiting the reduction of the minimum wage in the context of indexation. The remaining provisions of the Directive, including those promoting collective bargaining, remain in force. The ruling may require a revision of the Polish draft law on minimum wages (No. UC62), which provides for a mechanism to update wages every four years based on the contested criteria.

Full-time postgraduate studies are not a non-contributory period

Full-time postgraduate studies at public universities do not constitute a non-contributory period when determining the right to a pension, explained the Deputy Minister of Family, Labor and Policy in response to a parliamentary question of 10 November 2025. Pursuant to Article 7(9) of the Pension Act,

a non-contributory period is studying at a higher education institution in one field, provided that the studies are completed, which applies to persons obtaining higher education for the first time. The Ministry emphasises that participants in full-time postgraduate studies are in a qualitatively different situation than those pursuing doctoral or assistant studies, which involve independent performance of activities typical of professional work. The current structure of the catalogue of non-contributory periods does not violate the constitutional principle of equality and the Ministry of Family, Labour and Social Policy does not plan to modify it.

Higher limits for supplementing retirement pensions and disability pensions from December

Pensioners who have not reached the general retirement age must control their income to avoid having their benefits reduced or suspended, ZUS reminds. From 1 December 2025 to 28 February 2026, the limit exceeding which results in a reduction of the retirement pension or disability benefit is PLN 6,140.20 gross (70% of the average salary from the third quarter of 2025), while the benefit suspension threshold is PLN 11,403.30 gross (130%). The limits do not apply to persons who have reached the general retirement age (60 for women, 65 for men), with the exception of pensioners receiving a supplement to the minimum pension. People earning extra money to supplement their benefits should report their income to ZUS by the end of February of the following year, choosing the settlement system that is more advantageous for them – monthly or annual.

From 2026, entrepreneurs with a turnover of PLN 200,000-240,000 will be entitled to VAT exemption.

Taxpayers whose sales value in 2025 exceeded PLN 200,000 but did not exceed PLN 240,000 will be able to benefit from the subjective VAT exemption from 1 January 2026, without a one-year grace period, confirmed the Deputy Minister of Finance in response to parliamentary question no. 12839. The explanation concerns the application of the transitional provision of the Act of 24 June 2025 (Journal of Laws of 2025, item 896), which excludes the rule of Article 113(11) of the VAT Act introducing a one-year grace period. The doubts arose from the imprecise wording of the regulations, which some experts interpreted as meaning that it was necessary to wait a year after losing the right to exemption. The Ministry emphasises that the legislator's intention was to enable the exemption to be used from 1 January 2026.

Requests to conclude a PPK management agreement only electronically

The Polish Development Fund will send notices to conclude an agreement to manage an employee capital plan exclusively electronically via the ZUS Electronic Services Platform to the information profiles of employing entities. This is the intent of the bill amending the Act on Employee Capital Plans, published in the Council of Ministers' legislative agenda on 6 November 2025. In its justification, the Ministry of Finance



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emphasised that sending notices electronically was an effective and cost-effective solution and was positively received by businesses. This option was available only for one year after the end of the COVID-19 epidemic emergency, i.e. until July 2024, and the proposed regulations are intended to introduce electronic summonses on a permanent basis. The request will be deemed effective on the day of its receipt by the employing entity or after 14 days from its posting on the information profile if it is not collected

Registering a car alone does not guarantee a higher limit

From 1 January 2026, entrepreneurs settling the depreciation of combustion cars emitting more than 50 g CO₂/km will have to apply a lower tax cost limit – PLN 100,000. The current, more favourable limit (PLN 150,000) will only cover vehicles entered into the fixed asset register before 1 January 2026. The Ministry of Finance explains that simply registering a car before that date is not sufficient; the actual

inclusion in the register is decisive. For new cars, the settlement method is determined by the exhaust emission data from the certificate of conformity in CEPIK. An entrepreneur who does not include a car in the register before 2026 will not benefit from the higher depreciation limit.

Three shopping Sundays in December - PIP reminds about work limits

In December 2025, pre-Christmas shopping will be possible on three consecutive shopping Sundays preceding Christmas Eve, informs the National Labor Inspectorate. According to the new regulations, an employee may perform work in trade or related activities on a maximum of two of these three Sundays. The employer is obliged to provide another day off within 6 days before or after Sunday, and if this is not possible – until the end of the settlement period. If a day off is not granted, the employee is entitled to an allowance of 100% of the remuneration for each hour of work on Sunday or Christmas Eve. Exceptions to the work ban on these days include emergency services, catering and transport.



IMPORTANT INTERPRETATIONS AND RULINGS

Free management by a shareholder does not generate any income for the company

↓ A limited liability company does not generate income from gratuitous benefits when the majority shareholder serves as the president of the management board without remuneration – confirmed the Director of the National Revenue Information Centre in the interpretation of 7 November 2025 (ref. 0111-KDIB2-1.4010.410.2025.2.KW). The authority found that the managing partner of the company receives an equivalent in the form of the right to a dividend and an increase in the value of shares, which excludes the recognition of such a benefit as gratuitous within the meaning of Article 12(1)(2) of the CIT Act. This position is confirmed by the case law of the Supreme Administrative Court, according to which a free benefit requires the absence of any form of equivalent. The Commercial Companies Code does not require remuneration for management board members, and the direct influence of a shareholder on the company's profit constitutes a real financial benefit.

Prizes in promotional competitions up to PLN 200 exempt from PIT

↓ Prizes with a value not exceeding PLN 200 awarded in promotional competitions aimed at advertising the organiser are exempt from personal income tax pursuant to Article 21(1)(68a) of the Personal Income Tax Act, ruled the Voivodeship Administrative Court in Gliwice in its judgment of 15 October 2025 (case file reference number I SA/GI 1217/24). The Regional Administrative Court emphasised that competitions are based on the construction of a public promise and their participants are not obliged to provide any reciprocal benefits, which means that the prizes constitute gratuitous benefits. The court also found that the competition reinforces associations with the company's products in the participants' memories, which confirms the connection with the organizer's promotion and advertising and, therefore, the

company is not subject to the obligations of a personal income tax payer.

A cash allowance instead of a company car is a tax-deductible expense

↓ The company may include in the tax-deductible expenses the cash allowance paid to employees in exchange for giving up the use of a company car – confirmed the Director of the National Revenue Information Centre in the interpretation of 20 November 2025 (ref. 0111-KDIB1-2.4010.520.2025.1.AK). These expenses, as activities rationalising costs and aimed at securing the source of revenue, meet the conditions specified in Article 15(1) of the CIT Act. In the tax authority's assessment, the key factor is the purposefulness and rationality of the expense and the fact that the allowance was not excluded in the negative costs catalogue. This solution simplifies the company's budget and positively impacts its image as an employer, enabling flexible management of employee benefits. The Director of the National Revenue Information Centre fully agreed with the company's arguments, waiving the legal substantiation.

Providing accommodation to employees without paying social security contributions

Providing employees and contractors with residential accommodation belonging to the employer, on the basis of a loan agreement and for partial payment, does not constitute a basis for calculating social security contributions - according to the interpretation of the Social Insurance Institution (ZUS) of 12 November 2025 (ref. DI/200000/43/998/2025). Such a benefit meets the conditions of § 2(1)(26) of the Contribution Regulation: it is non-cash, the employee pays a fixed partial fee, the principles result from the remuneration regulations or another internal act, and the value of the accommodation constitutes income for personal income tax purposes. As a consequence, the difference between the value of accommodation and the payment is not covered by contributions – both for employees and contractors, and the decision is binding on ZUS only in the case described.



CALENDAR

22 December 2025 (Monday)

- ✓ Payment of the monthly personal and corporate income tax advance for November 2025.
- ✓ Payment of collected contributions on revenues under employment relationships for November 2025.
- ✓ Payment by payers of collected income tax advances or lump-sum income tax for November 2025.
- ✓ Payment of the tax advance collected for November 2025 by the parent company representing the tax capital group.
- ✓ Payment of the due lump-sum tax if the income on dividend and other revenues due to share in profits of legal persons in November 2025 was expended in violation of the intended allocation specified in the declaration (CIT-5).
- ✓ Payment of the tax advance for November 2025 by the property company and sending the taxpayer information about the advance payment PIT-ISN and CIT-ISN, respectively
- ✓ Payment of income tax on revenues on a fixed asset in the form of a building for November 2025.
- ✓ Payment of the lump-sum on companies' income (the so-called Estonian CIT) due to: concealed profits and expenses unrelated to the business activity - if pay-out or expense was incurred or a consideration was provided in November 2025; change of value of assets - if acquisition, transformation was carried out or in-kind contribution was made in November 2025.
- ✓ Payment of tax on consideration or property the family foundation transferred or put at the disposal in November 2025.
- ✓ Payment of ZUS contributions for November 2025 - other contribution payers
- ✓ PFRON payment for November 2025.



29 December 2025 (Monday)

- ✓ VAT payment for November 2025.
- ✓ Filing the VAT-8, VAT-9M, VAT-12 declarations for November 2025.
- ✓ Sending the JPK_V7M file for November 2025.
- ✓ Sending the JPK_V7K file for November 2025 (record part).
- ✓ Payment of excise tax for November 2025 and submission of excise tax declaration.
- ✓ Sending summary information on intra-Community VAT-EU transactions for November 2025.
- ✓ Filing the VAT-13 declaration by a tax representative for November 2025.
- ✓ Settlement of sugar tax due for November 2025.
- ✓ Settlement of tax on retail sale PSD-1 for November 2025.
- ✓ Sending documents regarding co-financing of remuneration of disabled employees to PFRON for November 2025.



31 December 2025 (Wednesday)

- ✓ Filing the declaration for VAT settlement regarding the VII-DO import procedure for November 2025.
- ✓ Filing the application for refund of retirement and disability pension contributions paid for October 2025 with PFRON by disabled persons conducting a business activity.
- ✓ Filing with the tax office by a general partnership with its registered office or management board in the territory of the Republic of Poland, whose partners are not exclusively natural persons, the CIT-15J information (including attachment CIT/JW)



5 January 2026 (Monday)

- ✓ Filing the VAT-14 declaration on the amounts of VAT due in the case of intra-Community purchase of motor fuels for December 2025.



CALENDAR

7 January 2026 (Wednesday)

- ✓ Payment of the lump-sum income tax collected in December 2025 on receivables paid to a foreign legal person.
- ✓ Payment of the lump-sum income tax collected in December 2025 on revenues from dividends and other revenues from share in the profits of legal persons, and providing taxpayers with CIT-7 information on collected tax.
- ✓ Payment by the acquiring company of the lump-sum tax on income originating in December 2025.
- ✓ Filing the declaration of the amount of income from unrealised profits (PIT-NZ and PIT-NZS) for December 2025 and payment of tax due resulting from the declaration
- ✓ Filing the declaration of the amount of income from unrealised profits (CIT-NZ) for December 2025 and payment of the tax due disclosed in the declaration.



12 January 2026 (Monday)

- ✓ Filing the INTRASTAT declaration for December 2025.



15 January 2026 (Thursday)

- ✓ Payment of the recycling fee for plastic bags collected in Q4 2025.
- ✓ Payment of ZUS contributions for December 2025 - contributions payers having legal personality.
- ✓ Payment to PPK (Employee Capital Plans).



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