

Zakon o centralnoj evidenciji stvarnih vlasnika | Law on the Central Register of Beneficial Owners

Pravne vesti | Legal News
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Poštovani,

Obaveštavamo Vas da je dana 6. marta 2025. godine proglašen Zakon o centralnoj evidenciji stvarnih vlasnika (dalje: „**Zakon**“). Zakon je stupio na snagu 14. marta 2025. godine, s tim da je njegova primena, osim određenih odredaba, odložena za 18 meseci od stupanja na snagu, a postojeći registrovani subjekti dužni su da se usklade sa odredbama ovog Zakona u roku od 60 dana od dana pocetka primene (tj. najkasnije do **13. novembra 2026. godine**).

Glavne novine koje Zakon donosi su sledece:

- Zakon uvodi novi osnov evidentiranja u centralnoj evidenciji koji je odnosi na trustove i odnose slične trustu.
- Produžen je rok za evidentiranje podataka u centralnu evidenciju sa 15 na 30 dana od dana nastupanja osnova evidentiranja.
- Proširena je sadržina centralne evidencije uvođenjem obaveze učitavanja dokumenata na osnovu kojih je stvarni vlasnik određen, kao i kopije pasoša ili strane lične karte za strane stvarne vlasnike.
- Uvedena je obaveza godišnje provere tačnosti i ažurnosti evidentiranih podataka o stvarnom vlasniku.
- Agencija za privredne registre objavljuje na svojoj internet stranici listu registrovanih subjekata koji nisu izvršili evidentiranje stvarnog vlasnika u roku od 30 dana od osnivanja, ili od brisanja stvarnog vlasnika na osnovu sudske presude. Lista takođe uključuje subjekte koji do pocetka primene Zakona nisu evidentirali podatke o stvarnom vlasniku, kao i one koji u roku od 60 dana od pocetka primene Zakona ne učitaju potrebne dokumente.
- Pooštrena je kazna zatvora za krivično delo prikrivanja stvarnog vlasnika, te je propisana kazna zatvora od 6 meseci do 5 godina.
- Za prekršaje u vezi sa Zakonom, može se izreći zabrana vršenja određenih delatnosti registrovanom subjektu i odgovornom licu, kao i fizickom licu povereniku trusta, u trajanju od 6 meseci do 3 godine.
 - **Odredene odredbe primenjuju se odmah po stupanja na snagu Zakona, i to da ovlašćeno lice mora čuvati dokumente o stvarnom vlasniku 5 godina od prestanka subjekta, dok u slučaju suprotnog postupanja tom licu za prekršaj može biti izrečena novčana kazna od 50.000 do 150.000 dinara.**

Ukoliko imate bilo kakvih pitanja u vezi sa gore navedenim, stojimo

Dear Sir/Madam,

We inform you that on 6 March 2025, the Law on the Central Register of Beneficial Owners (hereinafter: “**the Law**”) was enacted. The Law came into force on 14 March 2025, with its application, except for certain provisions, postponed for 18 months from the date of entry into force, while existing registered entities are required to comply with the provisions of this Law within 60 days from the start date of its implementation (i.e. at latest by **13 November 2026**).

The main novelties introduced by the Law are as follows:

- The Law introduces a new basis for registration in the central registry such as trusts and trust-like relationships.
- The deadline for registering data in the central registry has been extended from 15 to 30 days from the date the basis for registration occurs.
- The content of the central registry has been expanded by introducing the obligation to upload documents based on which the beneficial owner is determined, as well as a copy of the passport or foreign ID card for foreign beneficial owners.
- The obligation to annually verify the accuracy and currency of the registered beneficial owner data has been introduced.
- The Business Registers Agency publishes on its website a list of registered entities that have not registered their beneficial owner within 30 days of establishment, or within 30 days from the removal of the beneficial owner based on a court ruling. The list also includes entities that have not registered beneficial owner data by the start of the Law's application, as well as those who fail to upload the required documents within 60 days of the Law's implementation.
- The prison sentence for the criminal offense of concealing the beneficial owner has been tightened, with a prison sentence ranging from 6 months to 5 years.
- For offenses related to the Law, a ban on performing certain activities may be imposed on the registered entity and the responsible person, as well as on the trustee of the trust, for a period of 6 months to 3 years.
 - **Certain provisions apply immediately upon the entry into force of the Law, specifically that the authorized person must retain documents regarding the beneficial owner for 5 years after the entity ceases to exist, while in the case of the opposite behaviour, that person may be fined from RSD 50,000 to 150,000 for the misdemeanour.**

Should you have any questions regarding the above, we stay at your

vam na raspolaganju.

disposal.

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Ne preporučujemo preduzimanje bilo kakvih aktivnosti bez profesionalnog saveta i detaljnog pregleda konkretne situacije.

The information provided herein is of a general nature and does not apply to any particular legal or natural person. Although the intention of this document is to provide accurate and up-to-date information, we do not guarantee the accuracy of the information from the date of receipt or in the future.

We do not recommend taking any action without professional advice and a detailed review of the particular situation.