German Tax Monthly

Information on the latest tax developments in Germany

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Overview of Legislation Finalised at the End of 2025

At the end of 2025, numerous tax-related legislative procedures were finalized with promulgation in the Federal Law Gazette: The Active Pension Act (23 December 2025), the Second Act to Strengthen Company Pension Schemes (21 January 2026), the Minimum Tax Amendment Act (23 December 2025), the Minimum Tax Report Ordinance (29 December 2025), the Act to Implement DAC8 (23 December 2025), the Act to Modernise and Digitalize the Fight Against Illegal Employment (29 December 2025) and the Seventh Ordinance Amending Tax Ordinances (29 December 2025), among others. The Acts generally entered into force on the day after their promulgation.

Active Pension Act

From the 2026 assessment period, employees who continue to work beyond the statutory retirement age limit will be entitled to a tax exemption of EUR 2,000 per month for income from employment that is subject to social security contributions. For further details see GTM November 2025.

Second Act to Strengthen Company Pension Schemes

The Act intends to make company pensions even more widespread. To this end, the framework conditions are improved, among others, in tax law. For further details see GTM August / September 2025.

Minimum Tax Amendment Act

The primary aim of the Act is to implement new OECD Administrative Guidance items from 15 December 2023, 24 May 2024 and 13 January 2025 on the global minimum tax in the German Minimum Tax Act. In addition, individual anti-profit shifting regulations are reduced to the necessary level as accompanying measures to avoid bureaucracy. For further details see GTM December 2025.

Minimum Tax Report Ordinance

The Minimum Tax Report Ordinance regulates the scope of application, definitions, the competent authority, the sections of the minimum tax report, the exchange of information and distribution approach, the simplified reporting during the transitional period and the preparation of the minimum tax report. For further details see GTM December 2025.

Act to Implement DAC8

In particular, the Act covers the transposition of the 8th amendment of the Directive on Administrative Cooperation (DAC8) into national law. The Act creates

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an obligation for providers of crypto-asset services to report to the Federal Central Tax Office in a systematic manner annually specific information that enables users to be identified and the transactions carried out by them to be quantified. For further details see GTM October 2025.

Act to Modernise and Digitalize the Fight Against Illegal Employment

The Act also includes an extension of the retention periods for accounting documents at banks, insurance companies and securities institutions to ten years permanently. For further details see GTM August / September 2025.

Seventh Ordinance Amending Tax Ordinances

Regulations with an international dimension to be amended include implementing the notification of the change from the exemption to the tax credit method under the DTT Lithuania and amending the Ordinance on the Allocation of Profits of Permanent Establishments regarding foreign insurance enterprises. For further details see GTM December 2025.

Government Draft of a Ninth Act Amending the Tax Advisory Act and Other Tax Regulations

On 14 January 2026, the Federal Cabinet approved the government draft of a Ninth Act Amending the Tax Advisory Act and Other Tax Regulations. In addition to amendments to the Tax Advisory Act, the draft also provides for an increase in the minimum local trade tax rate and amendments to the Real Estate Transfer Tax Act (to exclude possible double taxation in the event of a time lag between signing and closing, and to extend the notification period for real estate acquisitions).

The draft bill can now be submitted to the parliamentary process. Significant changes may still be made during the process. The legislative process may be completed before the parliamentary summer recess.

Minimum Local Trade Tax Rate

The local trade tax rate is calculated by multiplying the municipal assessment rate by the basic federal tax rate of 3.5 percent. Each municipality can set its own assessment rate. In 2024, the average in Germany was 409 percent, resulting in an average trade tax rate of 14.3 percent (3.5% * 409%).

However, there is a minimum rate for the municipal assessment rate, which currently stands at 200 percent resulting in minimum local trade tax rate of 7 percent (200% * 3.5%).

The minimum assessment rate is to be raised to 280 percent with effect from 2027. As a result, the minimum local trade tax rate would increase from 7 percent to 9.8 percent (280% * 3.5%). The aim is to counteract the practice of companies using low-assessment-rate municipalities to an even greater extent than is already the case.

Real Estate Transfer Tax

Taxation in the event of a time lag between signing and closing

The direct or indirect transfer of shares in corporations or partnerships that own real estate (share deals) can trigger two taxable events, which can lead to double taxation of real estate transfer tax for the same share deal:

1. At the time of signing (signing of the contract under the law of obligations – binding transaction; share consolidation / share transfer in accordance with Section 1 (3) or Section 1 (3a) of the Real Estate Transfer Tax Act (RETTA)). The tax is usually assessed against the purchaser of the shares.
2. At the time of closing (transfer of shares; change of shareholders in accordance with Section 1 (2a) RETTA in the case of partnerships or Section 1 (2b) RETTA for corporations). The tax is assessed against the company that owns the property.

The Annual Tax Act 2022 introduced a legal provision to avoid double taxation (Section 16 (4a) and (5) RETTA): Upon request, the (first) assessment of real estate transfer tax for the signing will be revoked or amended if the shares are transferred in fulfillment of the underlying legal transaction (signing) and the taxable event for the closing is thereby realized. However, the provision only applies if all real estate acquisitions affected by this transaction were notified to the tax office in full within the strict deadline of two weeks.

The present draft law aims to resolve the issue of double taxation of the same transaction. To this end, the order of priority for taxation, i.e., the sequence in which the tax criteria are applied, will be reversed: in future, signing will be taxed primarily. Taxation of closing will only be secondary.

The above-mentioned procedural requirements for the necessary notification of acquisition transactions to avoid double taxation will no longer be necessary in future and are therefore to be repealed.

First-time application: The new regulation is to apply for the first time to legal transactions that are realized after the date of promulgation of the Act. In cases where the contract is concluded before the first-time application of the Act (signing), i.e., on or before the date of promulgation, but the shares are only transferred after that date (closing), only the signing is to be taxed.

Tax liability for real estate transfer tax

Under current law, at the time of signing (Section 1 (3) and (3a) RETTA), the debtor of the real estate transfer tax is the shareholder acquiring the shares and, in the case of a transfer of already combined shares (i.e. at least 90%), also the selling shareholder. At closing (Section 1 (2a) and (2b) RETTA), however, the company owning the real estate owes the real estate transfer tax. Due to the planned reversal of the taxation priority, the shareholder's tax liability would become the rule rather than the exception in the future, and vice versa regarding the tax liability of the real estate-owning company.

The draft law therefore provides for an extension of tax liability. In addition to the acquiring shareholder – and, in the case of the transfer of combined shares, the selling shareholder – the company owning the real estate will also be liable for real estate transfer tax in future, so that, according to the explanatory memorandum to the Act, the company owning the real estate can continue to be held liable in future.

The new regulation is to come into force on the day after the Act is promulgated.

Notification Period

Under current law, the notification periods for parties involved in domestic transactions are two weeks. The notification period is to be extended to one month. According to the explanatory memorandum to the Act, this is intended to harmonize the length of the deadlines in cases where the taxpayer has no domestic connection.

The new regulation is to come into force on the day after the Act is promulgated.

Federal Tax Court (I R 20/22): Loss Deduction Restriction to Prevent Double Use of Tax Group Losses in Germany and Abroad

The Federal Tax Court comments on previously unresolved issues surrounding the loss deduction restriction in Section 14 (1) sentence 1 no. 5 Corporate Income Tax Act. In addition to the temporal and personal application of the regulation, the Court also comments on the question of "taking negative income into account abroad". Although the provision was repealed in the course of the Growth Opportunities Act in 2024, the substantive comments of the Federal Tax Court may still be relevant in practice for other regulations.

In the case at hand, there was an income tax group between a limited liability company (GmbH) as the controlled company and a controlling company (German GmbH as well) with a US Inc. as a shareholder. From a US perspective, the controlling company is treated as a partnership. In the year in dispute, 2010, the tax group incurred a total loss. The question was whether Section 14 (1) sentence 1 no. 5 Corporate Income Tax Act applied and whether the loss could not be taken into account in Germany because the losses were also taken into account for tax purposes in the USA. The Lower Tax Court of Dusseldorf (7 K 905/19 K,G,F as of 30 March 2022) had argued that the named regulation had been introduced retroactively in 2013 for all cases that had not been finally assessed and was therefore constitutionally objectionable, meaning that the provision did not apply in the present case.

According to the Federal Tax Court's decision, the retroactive introduction of the provision is not objectionable from a constitutional point of view. Furthermore, the Federal Tax Court clarifies that Section 14 (1) sentence 1 no. 5 Corporate Income Tax Act also applies for trade tax purposes. The Federal Tax Court has now referred the case back to the Lower Tax Court of Dusseldorf for review, as the Lower Tax Court must examine whether the loss was also deducted in the USA. The deduction of losses abroad must have led to an actual reduction in foreign tax (cross-period consideration); it is not sufficient, for example, if the losses are carried forward or back without being claimed as tax-reducing.

Note: Although Section 14 (1) sentence 1 no. 5 Corporate Income Tax Act was deleted with effect from the 2024 tax year, the provision on the deduction of operating expenses in the event of taxation inconsistencies (Section 4k (4) Income Tax Act), which has been in force since 2020, contains a similar rule: "... Expenses are also not deductible as business expenses to the extent that the expenses are also taken into account in another country." According to the explanations in the Ministry of Finance guidance as of 5 December 2024 on Section 4k Income Tax Act, the increase in a loss that can generally be offset for tax purposes is also taken into account in this sense.

Federal Tax Court (II B 5/25): Examination of the EU Energy Crisis Contribution's Compliance with European Law

The Federal Tax Court has expressed significant doubts regarding the compliance of the EU Energy Crisis Contribution with European law, leading to the suspension of execution. The conflict in Ukraine has undeniably resulted in an energy crisis across

Europe. Nevertheless, certain entities within the energy sector have reported substantial profits.

In response, several EU member states, including Germany, have implemented an excess profit tax, known as the EU Energy Crisis Contribution, under EU Regulation 2022/1854 dated 6 October 2022. This measure aims to capture the "excess profits" generated by companies in the energy sector during 2022 and 2023. Affected companies are required to independently calculate, declare, and pay the EU Energy Crisis Contribution to the Federal Central Tax Office.

From the beginning, there have been doubts regarding the compliance of the EU Energy Crisis Contribution with European law. The key issues include: the criteria for selecting affected companies, the disregard for incurred losses, the infringement of property rights, and questions about the legitimacy of the EU regulation's alignment with European law. Currently, there are three preliminary ruling requests pending before the European Court of Justice (ECJ) (C-358/24 – Belgium, C-533/24 – Ireland, C-251/24 – Romania), along with additional proceedings before the General Court concerning the EU Regulation (T-759/22, T-775/22, T-802/22, and T-803/22).

In the main proceedings, the Federal Tax Court must now decide whether the EU Energy Crisis Contribution is indeed contrary to European law or must present this question to the European Court of Justice.

Relief from German Withholding Tax in Case of Hybrid Entities – Current Developments

Introduction

The Federal Central Tax Office is increasingly denying exemption certificates to US corporations when the German company paying dividends or license fees is considered a partnership (disregarded entity) from a US perspective.

Refund and Exemption Procedures

If a double tax treaty (DTT), the Parent-Subsidiary Directive (Sec. 43b German Income Tax Act [ITA]), or the Interest and Royalties Directive (Sec. 50g ITA) allows for a reduction in WHT, a foreign corporation receiving dividends or license payments can apply to the Federal Central Tax Office for a full or partial refund of the WHT paid in Germany (Sec. 8 para. 1 sentence 1 German Corporate Income Tax Act (CITA) in conjunction with Sec. 50c para. 3 sentence 1 ITA, known as the refund procedure). When a foreign corporation applies for an exemption certificate from the Federal Central Tax Office, the distributing German corporation can immediately apply the reduced WHT deduction according to the DTT, Parent-Subsidiary Directive, or Interest and Royalties Directive once it receives the exemption certificate (Sec. 8 para. 1 sentence 1 CITA in conjunction with Sec. § 50c para. 2 sentence 1 no. 1 ITA, known as the exemption procedure). The refund and exemption procedure requires the foreign corporation to meet the substance criteria of Sec. 50d para. 3 ITA (German anti-treaty / anti-directive-shopping rule).

Hybrid Entities

Currently, there is no legal regulation, ruling of the Federal Tax Court, or official statement from the German tax authorities regarding the possibility of obtaining relief from WHT when the German company paying dividends or license fees is a hybrid entity. In this context, a hybrid entity is defined as one that Germany classifies as a non-transparent corporation, while the foreign country - particularly the USA - either disregards the entity for tax purposes or treats it as a transparent partnership.

Example - German Company as a Hybrid Entity with US Parent Corporation as the Recipient of Dividends

From a German point of view, the German company is treated as a non-transparent corporation, so that there is a dividend to a US parent company. Exemption certificates have therefore (so far) been granted by the Federal Central Tax Office based on the DTT Germany-USA in these cases, regardless of the fact that the dividend payment is disregarded for purposes of US taxation because the German company is classified as a disregarded entity from a US perspective.

The Federal Central Tax Office appears to have revised its opinion and is no longer issuing exemption certificates in this context. However, no official statement has been made. In the cases that have come to light, the new position is primarily justified by Art. 1 para. 7 DTT Germany-USA, which states: "In the case of an item of income, profit or gain derived by or through a person that is fiscally transparent under the laws of either Contracting State, such item shall be considered to be derived by a resident of a State to the extent that the item is treated for the purposes of the taxation law of such State as the income, profit or gain of a resident." This revised perspective based on Art. 1 para. 7 DTT Germany-USA contradicts the previously prevailing view. According to the dominant opinion in tax literature, Art. 1 para. 7 DTT Germany-USA applies whenever at least one of the two Contracting States considers the person deriving the income as transparent. The provision thus focuses on the recipient of the income rather than the German company paying the dividends or license fees.

Permanent Establishment Through Cross-Border Home Working: Changes in the OECD Model Commentary

With the increasing spread of remote work, many companies are faced with the challenge of managing the tax risks that can arise from cross-border home working.

In Germany, according to the Application Decree to the Fiscal Code (ADFC), the work of an employee from his home is generally not regarded as a permanent establishment, as the employer does not have sufficient power of control over the employee's premises. According to the ADFC, the situation may only be different in certain circumstances for employees in management positions. However, this generally welcomed view of the German tax authorities has led to qualification conflicts and consequently to double taxation risks in cases where, in the opinion of the other contracting state, a deemed power of control of the employer over the home is sufficient to create a permanent establishment.

The OECD has now published an updated version of the OECD Model Commentary on Article 5 of the OECD Model Tax Convention. The new version is intended to create more clarity as to when a permanent establishment is established through cross-border home working, and specifies corresponding criteria.

On the one hand, the updated OECD Model Commentary emphasizes that occasional business activities from an individual’s home generally do not constitute a permanent establishment in the sense of a fixed place of business. In addition to an individual’s "home" in the narrower sense, i.e. the employee's home or place of residence, the Commentary also refers to "other relevant places", such as a second home, a holiday rental, the home of a friend or relative. In the case of working from home for less than 50% of the total working hours over the course of any twelve-month period commencing or ending in the fiscal year concerned, no permanent business premises should be assumed for the enterprise of the employer.

Further analysis of the facts and circumstances is required if at least 50% of the working time is spent working from home, although a place of business is not necessarily given. In addition to other conceivable aspects, the decisive question is whether there is a business reason for the person's presence in the country, such as maintaining business relationships with local customers or suppliers. There must be a clear connection between the presence of the person and the location and business activities of the enterprise in that country.

The OECD also provides indications as to which circumstances of working from a home or another relevant place in the other State can speak in favour of the assumption of a permanent establishment in the sense of a fixed place of business in that other State because a business connection is seen. If employees are permitted to work from home solely to retain them in the company or to reduce costs, this should not be considered business reason.

In addition, it should be noted that the amended OECD Model Commentary focuses on the issue of a fixed place of business permanent establishment. Irrespective of this, the establishment of a so-called dependent agent permanent establishment, a management permanent establishment or a service permanent establishment remains relevant in terms of the activities and powers of the employees.

The implementation of the amended OECD Model Commentary on Article 5 may vary from country to country. The OECD recommends a dynamic interpretation in which the latest version of the Model Tax Convention and its commentary should be used to interpret agreements that have already been concluded.

For the interpretation of the OECD Model Commentary by the German tax authorities, see the article on the MoF guidance of 24 December 2025 in this issue.

It remains to be seen whether and in what form the German tax authorities – which on the basis of the Fiscal Code and the Application Decree to the Fiscal Code predominantly impose higher requirements than the OECD (also in the context of the updated OECD Model Commentary) for the establishment of a permanent establishment – will react to the current version of the updated OECD Model Commentary.

Federal Ministry of Finance: Interpretation of Double Taxation Treaties Taking into Account the OECD Model Tax Convention

In a guidance dated 24 December 2025, the Federal Ministry of Finance (MoF) changed its opinion on the consideration of the OECD Model Tax Convention (OECD-MTC) in the interpretation of double taxation treaties (DTTs). The background to this is the Federal

Tax Court ruling I R 42/20 of 5 December 2023.

In its decision, the Federal Tax Court confirmed its established case law that DTTs are to be interpreted statically and not dynamically (contrary to the BMF guidance dated 19 April 2023). According to the previous administrative opinion, the interpretation of a treaty was not "frozen" at the time of its conclusion. The OECD commentaries, in the version applicable at the time of application, must be taken into account when determining the interpretation of provisions of the OECD-MTC or corresponding provisions of DTTs between OECD member states. This applies in particular to subsequent additions and clarifications to the Commentary.

According to the new MoF guidance dated 24 December 2025, the following now applies to the interpretation of DTTs:

1. It is established case law of the Federal Tax Court that DTTs, as international treaties, must be interpreted in good faith in accordance with the ordinary meaning of their provisions in their context, in light of their objectives and purposes. The wording of a provision of a DTT represents the limit of interpretation.
2. If the wording of a provision of a DTT between OECD member states to be interpreted is identical or at least comparable to a provision of the OECD-MTC, the OECD commentaries on this provision – taking into account the observations of the OECD member states contained therein – in the version applicable at the time of implementation of the DTT into German law is to be regarded as rebuttable evidence of the practice of OECD member states in interpreting the provisions of their DTTs corresponding to the OECD-MTC.
3. The OECD Commentary, in the version applicable at the time of application, contains the understanding of the OECD member states regarding the interpretation of the provisions of the OECD-MTC. It does not constitute a legal norm but aims to avoid conflicts of interpretation and promote harmony in decision-making. Within the limits of the wording of the treaty provision to be interpreted, the version of the OECD Commentary applicable at the time of application must therefore also be used for interpretation, insofar as it contains clarifications and specifications in particular compared to earlier versions of the OECD Commentary.
4. If the wording of a provision of a DTT between OECD member states to be interpreted is neither identical nor at least comparable to a provision of the OECD-MTC, interpretation using the OECD Commentary is ruled out.
5. If other administrative instructions (including the publication of decisions of the Federal Tax Court in the Federal Tax Gazette, Part II) result in a different understanding of the treaty, this takes precedence over that of the OECD Commentary.

The MoF guidance dated 24 December 2025 replaces the MoF guidance dated 19 April 2023.

Federal Ministry of Finance: Tax Group and Atypical Silent Partnerships

The Federal Ministry of Finance (MoF) has reacted to the Federal Tax Court decisions of 11 December 2024 (I R 33/22, I R 17/21) on corporate tax groups involving a corporation in which there is an atypical silent partnership.

The MoF had previously taken the strict view that a corporation in which there is an atypical silent partnership cannot be either a controlled company or a controlling company (MoF guidance dated 20 August 2015). In contrast, in the aforementioned rulings, the Federal Tax Court has established the following principles, among others:

1. If there is an atypical silent partnership in a corporation (either in the entire company or only in a part of the company), it can still be a controlled company within a corporate tax group, as it can transfer its annual net profit under commercial law, determined taking into account the silent partner's share of profits, to the controlling company as "total profit".
2. If there are several independent atypical silent partnerships, each (only) in different branches of a corporation, then this corporation can in principle be the controlling company of a corporate tax group. However, it depends on the specific structure in each individual case, in particular which division of the company the tax group participations are to be assigned to and who is entitled to the transferred profit.

In the opinion of the tax authorities, the following principles now apply for the recognition of a corporate tax group in connection with atypical silent partnerships:

Atypical silent partnership

If a silent partnership pursuant to Section 230 of the German Commercial Code exists in the commercial business of a corporation and qualifies as a partnership for income tax purposes (atypical silent partnership), this atypical silent partnership cannot be a controlled company nor a controlling company.

Corporation in which an atypical silent partnership exists

If an atypical silent partnership exists in a corporation, it may be a controlled company.

A corporation in which an atypical silent partnership exists can only be a controlling company if participation in the controlled company is attributable to a business division of the corporation in which there is no atypical silent partnership. If, on the other hand, the atypical silent partnership exists in the entire commercial business of the corporation, it cannot be a controlling company.

Application rule

The current MoF guidance replaces the MoF guidance dated 20 August 2015 and is to be applied in all cases still pending.

The easement provision set out in the MoF guidance dated 20 August 2015, according to which tax groups already recognised for tax purposes on 20 August 2015 with controlling companies in whose entire commercial business atypical silent partnerships exist can continue to be recognised for tax purposes, taking into account the circumstances of the individual case, by way of easement and for reasons of legitimate expectations, will be continued.

Federal Ministry of Finance: Status of Double Taxation Treaties as of 1 January 2026

The Federal Ministry of Finance (MoF) has published the current status of double taxation treaties (DTTs) and treaty negotiations as of 1 January 2026. The MoF guidance also addresses the first-time application of the BEPS Multilateral Instrument (MLI) from 1 January 2026 for certain countries. It also addresses the "suspension" of the DTTs with Russia and Belarus as well as DTTs with non-cooperative tax jurisdictions (within the meaning of the Tax Haven Defence Act).

DTT with Russia

In a note verbale dated 8 August 2023, the Russian Federation announced the "suspension" of Articles 5 to 22 and 24 of the DTTA between Germany and Russia as well as points 2 to 7 of the protocol to this treaty with immediate effect and until further notice. This affects all types of income covered by the DTT and additionally by the Protocol to the DTT as well as the suspension of the prohibition of discrimination under Article 24 of the DTT in conjunction with the Protocol to the DTT. This unilateral suspension does not lead to a cancellation of the treaty under international law, meaning that it continues to exist. However, from 1 January 2024, German taxation rights will no longer be affected by the DTT with the Russian Federation on the basis of Section 1 (3) sentence 2 of the Tax Haven Defence Act in conjunction with the Tax Haven Defence Regulation.

DTT with Belarus

The DTT of 30 September 2005 between Germany and Belarus is fully suspended with effect from 1 January 2025. This was notified to the Republic of Belarus on 30 December 2024. The Republic of Belarus had already suspended individual provisions of the DTT as of 1 June 2024. The Republic of Belarus has not complied with a request from the Federal Government to reverse this partial suspension of the treaty. The Federal Government considers this to be a material breach of the treaty within the meaning of the Vienna Convention on the Law of Treaties.

Non-cooperative tax jurisdictions

The MoF guidance also refers to the procedure regarding non-cooperative tax jurisdictions. This concerns Trinidad and Tobago from 2022 and the Russian Federation from 2024. In this context, German taxation rights are not affected by the DTT based on Section 1 (3) sentence 2 of the Tax Haven Defence Act in conjunction with the Tax Haven Defence Regulation.

Multilateral Convention (MLI)

The MLI entered into force for Germany on 1 April 2021. However, due to the selection decision made by the German side on Article 35(7) MLI, the modification of a tax treaty covered by the MLI will only become effective after the conclusion of a subsequent application legislative procedure and corresponding notification to the OECD as depositary of the MLI for reasons of legal certainty and clarity.

From 1 January 2026, the MLI will also apply to the DTTs with Japan and Czechia.

The MLI has already been applicable to the following DTTs since 1 January 2025:

- France
- Greece
- Croatia
- Malta
- Slovakia
- Spain
- Hungary.

Status of the double taxation treaties

As of 1 January 2026, the following revision protocols are (so far) applicable:

- Netherlands
- Switzerland.

No **new** revision protocol to a DTT was **signed** in 2025.

In 2025, new treaty texts for the following (revision) treaties or revision protocols were **initialed** (it should be noted that the treaty texts are generally only published after signing):

- Belgium
- Kuwait
- Montenegro
- New Zealand
- Serbia
- Slovenia (newly added to the list, although initialed on 18 March 2024).

Negotiations on revision protocols commenced with the following countries in 2025:

- France
- Italy.

It is not possible to predict how long the respective negotiations will last. The negotiations may also extend over several years.

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