HLB THE GLOBAL ADVISORY AND ACCOUNTING NETWORK

Tax Alert

August 2026

Issue No 3

www.hlb.global

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Law of the Kyrgyz Republic No. 145 dated 6 August 2026 “On Amendments to Certain Legislative Acts of the Kyrgyz Republic in the Field of Taxation and Non-Tax Revenue”

- New **fee for issuing non-residents with a permit (accreditation) to open and maintain bank accounts** with banks in the Kyrgyz Republic has been introduced into the **Code of the Kyrgyz Republic on Non-Tax Revenues**. The fee is payable by foreign non-resident entities opening such accounts. The amount of the fee will be established by the Cabinet of Ministers of the Kyrgyz Republic.
- **Progressive scale of fines for the movement of goods and vehicles across the state border from the territory of EAEU Member States without documents required under the tax legislation** of the Kyrgyz Republic and/or EAEU law has been introduced into the Code of the Kyrgyz Republic on Offenses.

The amount of the fine depends on the value of the goods and vehicles being moved and is as follows:

- 500 calculation indices (KGS 50k) for individuals and 1,000 calculation indices (KGS 100k) for legal entities — where the value is less than KGS 500,000;
- 1,000 calculation indices (KGS 100k) for individuals and 2,000 calculation indices (KGS 200k) for legal entities — where the value is from KGS 500,000 to KGS 1,000,000;
- 2,000 calculation indices (KGS 200k) for individuals and 3,000 calculation indices (KGS 300k) for legal entities — where the value is KGS 1,000,000 or more.

For repeated violations committed within one year after the application of enforcement measures, increased fines will apply.

Previously, the above violation was subject to a fixed fine of 200 calculation indices (KGS 20k) for individuals and 650 calculation indices (KGS 65k) for legal entities.

Resolution of the Cabinet of Ministers of the Kyrgyz Republic No. 565 dated 20 August 2026 “On Amendments to Resolution No. 93 of the Cabinet of Ministers of the Kyrgyz Republic dated 22 February 2022 ‘On Measures to Implement the Requirements of Articles 99, 100, 120, 125, 302 and 324 of the Tax Code of the Kyrgyz Republic’”

- The list of persons **not subject to the conditional VAT assessment regime** upon import of goods has been expanded.

The conditional VAT assessment regime upon import of goods now does not apply to entities supplying:

- heat energy;
- electricity;
- gas;
- motor vehicles.

- The conditions for the reapplication of the conditional VAT assessment regime upon import of goods have been amended.

The period required before reapplying the conditional VAT assessment regime has been reduced from one year to **six calendar months** from the date of cancellation of registration.

- The procedure for calculating the **period for claiming a refund of security deposits** upon the import of goods from third countries has been clarified.

The calculation of the 210-day period for applying for a refund of security deposits has been amended: for an application to the tax authority, the period is calculated from the date the imported goods are recorded; for an application to the customs authority, the period is calculated from the date the goods are released under the customs release procedure.

On 24 August 2026, a draft law was submitted to the Parliament "On Ratification of the Agreement between the Kyrgyz Republic and Hong Kong for the Avoidance of Double Taxation with Respect to Taxes on Income and Capital, signed on 2 March 2026 in Bishkek and Hong Kong" (the "Agreement")

- The Agreement provides for the following **withholding tax rates applicable to dividends, interest and royalties**:

- Dividends: 5% where the beneficial owner directly holds at least 20% of the capital of the company paying the dividends; 10% in all other cases.
- Interest: 8%. An exemption is provided for interest paid to governmental authorities and other state entities, subject to agreement between the competent authorities.
- Royalties: 8%.

- **Income from the alienation of shares (participation interests)**

Exemption from withholding tax is provided for income derived from the alienation of shares (participation interests). The exemption does not apply where, at any time during the 365-day period preceding the alienation, more than 50% of the value of the shares (participation interests) was derived directly or indirectly from immovable property situated in the relevant state.

- **Principal Purpose Test (PPT):** The tax authorities of the Kyrgyz Republic or Hong Kong may deny treaty benefits where one of the principal purposes of an arrangement or transaction was to obtain such benefits. The Agreement also provides that it should not be used to indirectly obtain tax benefits for residents of third countries.

On 26 August 2026, a draft Resolution of the Cabinet of Ministers of the Kyrgyz Republic on amendments to Resolution No. 94 dated 22 February 2024 "On Measures to Implement the Requirements of Articles 336 and 345 of the Tax Code of the Kyrgyz Republic" was submitted for public consultation

- The list of **petroleum products and components subject to Excise Tax** at a rate of KGS 5,000 per tonne is being expanded. In addition to motor and special-purpose gasoline, as well as light and middle distillates, the proposed amendments would include certain components classified under HS codes **2902600000, 2902700000, 2909199000 and 2921420001**.The amendments are proposed to apply to legal relations arising from 1 January 2025.

Resolution of the Cabinet of Ministers of the Kyrgyz Republic No. 553 dated 17 August 2026 "On Amendments to Resolution No. 21 of the Cabinet of Ministers of the Kyrgyz Republic dated 22 January 2026 'On Approval of the Procedure for the Allocation of the Tariff Exemption for Electric Vehicles'"

- It is provided that, when granting a tariff exemption in the form of exemption from import customs duties on electric vehicles, it is necessary to rely not only on EAEU Council Decision No. 111 dated 5 December 2025, but also on EAEU Council Decision No. 79 dated 9 July 2026, which provides for an increase in the quota for the Kyrgyz Republic from 15,000 to **25,000 units.** An online counter is available on the official website of the State Customs Service of the Kyrgyz Republic, allowing users to track in real time the amount of the quota already used and the remaining quota.