



Year-end pointers for Employers

With the end of the calendar year approaching, it's time to take a moment to see which matters require your attention in 2026. What new rules and obligations will apply next year? What points do you need to consider before the end of this year, and are there any steps you may want to postpone until 2027? In our Year-End Pointers, we provide tips and pointers for 2026, and we discuss what to take into account in 2027.

In these Year-End Pointers you can read more about deadlines, new legislation & obligations, and other key points of attention for employers.

If you have any questions, please do not hesitate to contact us. Your [Baker Tilly advisor](#) would be happy to explain how you can improve your tax position.

Please note: the House of Representatives and the Senate still need to approve a number of proposals. It is possible that certain measures will be implemented in a revised form, or not at all. This may affect these tax tips. Your advisor can tell you more.

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General pointers for employers

Uncertainty for ZZP'ers continues

The position of self-employed individuals without staff (a so-called 'ZZP'ers') has been the centre of attention for some time now. A new legislative act was proposed, the Wet VBAR, to replace earlier rules and codify case law, but that proposal has now been withdrawn.

In the week leading up to Budget Day, the minister provided an update on the so-called Zelfstandigenwet (Self-employed persons Act), which is meant to provide more certainty in advance from 1 January 2028, with the aid of a self-employed test and an employment relationship test. A draft legislative proposal was subsequently published for consultation. Keep an eye on [our website](#) for further developments, or contact your Baker Tilly advisor for an update.

Enforcement of false self-employment

In recent years, an 'enforcement moratorium' on false self-employment was in place, which meant the rules were only enforced in exceptional situations. But the Dutch Tax Authorities are now actively checking whether a ZZP'er should be considered an employee.



Pointer

Make sure you are aware of the rules. Take steps to detect and mitigate risks.

Please note: This year, legislation was adopted introducing a statutory presumption. From 31 December 2026, there is a legal presumption that an employment contract exists where work is performed at an hourly

rate of less than approximately €38. Our [Employment Advisory specialists](#) can provide further guidance.

Risks, additional assessments and penalties

If the Dutch Tax Authorities come to the conclusion that there is an employment contract instead of a contract for services, there is a risk that additional wage taxes and contributions are levied on the amounts paid to the ZZP'er, plus statutory interest and penalties. This creates a significant financial liability for the client/employer.

The additional levy is applied with retroactive effect to 1 January 2025. In cases of obvious false self-employment, retroactive taxation can also be imposed for periods prior to 1 January 2025. There is also an employment law risk, in that at some point (often in case of long-term illness or termination of the assignment by the client), the ZZP'er may claim that there is an employment contract, including sick pay, job protection, pensions, et cetera.



Pointer

Make sure you recognise potential risks in time and, if necessary, take measures to mitigate them. The position of ZZP'ers remains a hot topic and the risks are significant, especially for clients.



Map out risks regarding the hiring of ZZP'ers. Our experts would be happy to help.

Get your administration in order

As soon as possible, make sure that the financial administration and the wage administration are in alignment. If it becomes clear that certain remunerations have for example been paid, but are not included in the wage administration, you can still pay the wage tax due. The wage administration for 2026 must be finalised before submitting the wage tax return for the last wage period of the year. Points of attention in this regard are:

- a copy of the identification document (ID) of each employee
- invoices for benefits in kind and other provisions
- declarations for costs which have been reimbursed

It is not permitted to ask temporary agency workers for a copy of their ID. Instead, ensure that you have documented matters such as the type and number of the ID as well as the date of expiration. You should also make sure that you have accurately documented the wages and holiday bonuses paid to temporary agency workers as well as the number of hours that they have worked.

Check sector allocation & tax return period 2027

You will receive a sector allocation (by means of the 'beschikking gedifferentieerde premie Whk') from the Dutch Tax Authorities at the end of the year. Check whether your sector allocation for 2027 is accurate and still matches your business activities.

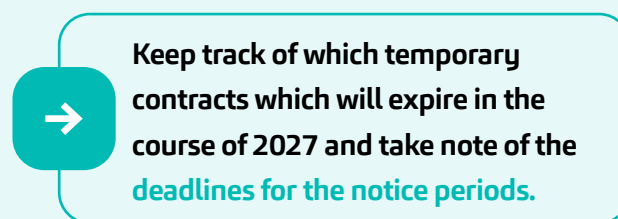
Do you want to change your wage tax return period from 2027 onwards? If so, do this before 14 December 2026, using the form 'Wijzigingen aangiftetijdvak loonheffingen'.

Take note of the increase in the Disability Fund contribution (Aof)

The contribution to the Disability Fund (Arbeidsongeschiktheidsfonds, "Aof") is expected to increase next year. The rates are anticipated to rise by 0.4 percentage points, to 8.03% for large employers and 6.67% for small employers. Various legal procedures to the Aof levy are currently ongoing. These objections concern, among other things, the level of the levy and the use of the proceeds for purposes other than those for which the levy was introduced. Contact your Baker Tilly advisor if you would like to learn more about this.

Don't forget the notice period for temporary contracts

Do you have any temporary employment contracts that end on 31 December 2026? If so, be sure to inform the employee on time whether or not you intend to prolong the contract. For contracts lasting longer than six months, a notice period of one month applies. If you do not give notice of whether or not you wish to prolong the contract on time, the employee can claim damages. Therefore, you should inform your employee before 1 December!



Create a transition compensation provision

Do you anticipate having to lay off an employee, for example due to poor performance, a restructuring or a reorganisation? In the event that you would be required to pay transition compensation, it may under certain

circumstances be possible to form a provision for this. In this regard, it is important that the expenditures are the result of facts and circumstances from before the balance date (and which can also be allocated to that period), and that there is a reasonable amount of certainty that you will have to pay transition compensation in the future. Make sure that you document the substantiation for this properly, having consulted your advisor at Baker Tilly.

Put deadlines for grant applications in your 2027 calendar

In 2027, there are various subsidy opportunities with regard to staff and taxes that can help businesses reduce costs and stimulate growth. This includes subsidies for hiring staff from specific target groups, such as young people or the long-term unemployed. There are also tax benefits, such as tax credits for investments in sustainable technologies and training. It is important to keep well-informed about the specific conditions and deadlines of these schemes to use the available support optimally. Add the 2027 deadlines to your calendar now.

Comply with the Waadi and note the new Wtta rules

If you post staff, you must adhere to the [Waadi rules](#). If you hire workers, you also have certain obligations. Make sure you are aware of the rules. Our experts would be happy to explain, and we can assist you in obtaining the relevant NEN certification if required.

As of 2027, new legislation will take effect: the [Posted Workers Supervision Act \(Wtta\)](#). This moves us from a registration system to an admission system. Our experts would be happy to explain what the Wtta entails, how to prepare your business for it, and why international companies, too, must pay close attention to the new rules.

Be prepared for the Pay Transparency Act (WLT)

Employers will soon be required to comply with new legislation on pay transparency. The EU Pay Transparency Directive (2023/970/EU) requires employers to provide a high degree of transparency on remuneration, from the recruitment process through to periodic pay reporting and employees' individual rights to information. The aim of the Directive is to definitively address structural pay inequalities between men and women.

This new legislation is expected to take effect from 1 July 2027, with varying levels of preparation and reporting requirements.



Pointer

Mapping your organisation's pay structure, job evaluation system and pay gaps, and implementing any necessary adjustments, can be time-consuming. Don't delay your preparations for this legislation. Our WLT Quick Scan provides a quick overview of how far your organisation has progressed in its preparations. Contact our [Employment Advisory specialists](#) for more information.

International employers

Withholding obligation within a group

Are you part of a group with group entities abroad? Under certain conditions you can transfer the wage tax withholding obligation to the Dutch part of the group. In this way you can prevent a foreign member of the group from being confronted with a Dutch withholding obligation and the administrative obligations that come with it. Be sure to submit any requests to the Dutch Tax Authorities on time.

Request an A1 declaration & extend work permits

If you have employees who work in the Netherlands but live across the border (or vice versa), it is important to determine their position for social security purposes. You can obtain certainty on this point with a so-called A1 declaration (within the EU) or a Certificate of Coverage (outside the EU), which is generally valid for a period of 12 months. Assess whether any existing A1 declarations or CoC's will expire and, if needed, request a new declaration so that you are certain of whether or not the employee is covered by social security in the Netherlands, in 2027.

As of 1 July 2023, a number of European member states (including the Netherlands) concluded a Framework Agreement on Social Security, in order to address the increasing demand for hybrid working for frontier workers. The framework allows frontier workers to remain covered by the social security of their country of work, for instance the Netherlands, under certain conditions. Check whether any employees meet these conditions and request an A1 declaration if needed.

In addition to this, assess whether you employ any workers who have either a [work permit](#) or a [combined permit for residence and work](#). These permits are only valid for a limited period of time, so it may be necessary to request an extension.



Pointer

Would you like to know more about international employership and Global Mobility? Our experts would be happy to tell you more.

Expat scheme and extraterritorial costs

If you recruit staff from abroad, it may be possible to apply for an expat ruling for certain employees with specific expertise which is scarce on the Dutch labour market. Under this 30%-ruling, you can pay out up to 30% of the gross wages tax free, in order to cover extraterritorial costs. Alternatively, you can reimburse the actual extraterritorial costs (instead of the lump sum of 30%). This choice needs to be made in the first wage tax return period of the relevant calendar year.

As of 1 January 2027, the 30%-ruling is to become a 27%-ruling. The maximum tax-free reimbursement is 27% of the taxable wages for the full duration of the ruling (with the cap at the WNT norm mentioned below). Pointer 1: Transitional law applies for employees with a 30%-ruling applied prior to 2024: they maintain their eligibility for a 30% tax-free reimbursement for the duration of the ruling.



Pointer

The minimum salary requirements will be increased as of 1 January 2027. The amounts will not be increased for employees with a 30%-ruling applied prior to 2025 (other than the normal annual indexation). For employees who do not fall within the scope of these transitional rules, employers should take the revised requirements into account when implementing salary increases, or inform those employees that they may lose entitlement to the expat ruling if the applicable salary requirement is not met.

Since 2024, the 30%-scheme is capped at the so-called 'Balkenende norm' or WNT norm. Transitional law ended on 1 January 2026.

End of transitional rules for expat schemes

After 31 December 2026, the transitional phase will end for the final remaining cases that could continue opting for treatment as partially non-resident taxpayer. This means that in principle, they will face full taxation of their worldwide Box 2 and Box 3 income, unless prevention of double taxation is offered.



Pointer

If needed, discuss with individual employees whether the end of these transitional rules will have consequences for their remuneration or tax position.

Employers & Mobility

Tax-free mileage allowance increased

Earlier this year, the Cabinet introduced a measure to support business travellers by **increasing the tax-free mileage allowance** from EUR 0.23 to EUR 0.25 per kilometre. The increase was implemented by means of a policy decree issued by the Ministry of Finance, allowing the increased allowance to be applied immediately for tax purposes. On Budget Day, the formal legislative amendment was submitted.



Pointer

Because the measure has retroactive effect, you may apply the higher tax-free mileage allowance for the entire 2026 calendar year. Your Baker Tilly advisor can tell you more about the correct way of processing this.

Beware of private-use kilometres of a company car

If a company car, which has been provided to an employee, is also used for private purposes, an additional taxable benefit may apply ('bijtelling'). In 2026, this was 22% of the list price of the car. Under certain conditions, the additional taxable benefit for electric cars may be lower: cars with no CO₂-emissions are subject to a taxable benefit at a rate of 18% on the first EUR 30,000 of the list price. This percentage is expected to rise to 20% in 2027.

If an employee has less than 500 private-use kilometres and provides you with a copy of the 'Verklaring geen privegebruik auto' ('Declaration of no private use of car') from the Dutch Tax Authorities, no additional taxable benefit applies. Check whether your employee also meets the conditions in 2026.

Please note: the employee must demonstrate that there are fewer than 500 private-use kilometres in a particular year, for example by means of mileage records. If the employee cannot demonstrate this, if challenged, or if the employee exceeds the 500-kilometre threshold, there will be an additional taxable benefit over the whole calendar year. Are you not in possession of a Declaration of no private use of car? In order to avoid the additional taxable benefit, you as the employer must be able to show that the distance driven by the employee for private purposes does not exceed the maximum amount of 500 kilometres per year.



Pointer

Bring the importance of documenting private-use kilometres and the 500-kilometre limit, to the attention of your employees. If the limit is exceeded in the last week of the year, this will have significant financial consequences for the employee!

Changes to the youngtimer scheme

The age threshold for applying the youngtimer scheme was previously increased from 15 to 16 years. This had an unintended adverse effect on vehicles that reached the age of 15 in 2025: they temporarily lost their youngtimer status as of 1 January 2026, only to fall within the scope of the scheme again later in 2026. Earlier this year, the Secretary of State resolved this issue through a policy decree. On Budget Day, legislation was subsequently presented to formally incorporate this solution into law.

The original proposal was to increase the age threshold from 16 to 25 years in a single step as of 1 January 2027. Following a parliamentary motion, a more gradual approach has now been adopted. The threshold will increase to 17 years in 2027 and to 20 years in 2028. As a result, a

structural youngtimer scheme will continue to apply, but it will become more focused on older vehicles with higher maintenance costs.

Additional transitional law will also be introduced. Vehicles that were already made available to an employee on or before 31 December 2025, as well as vehicles that reach the age of 17 years in 2027, may continue to benefit from the youngtimer scheme throughout the whole of 2027. From 2028, the new age threshold of 20 years will apply to all vehicles.

Please note: parts of this proposal are still subject to parliamentary approval. Your Baker Tilly advisor can keep you updated.

Note change to final levy on delivery vehicle

A taxable benefit is deemed present in the case of a delivery vehicle that can be used privately, unless the vehicle is demonstrably not used for more than 500 private kilometres on an annual basis. This is difficult to prove in practice for delivery vehicles continuously used on an alternating basis. In that situation, the employer used to be able to apply a final levy of EUR 451 (2026) per delivery vehicle per year, instead of applying an additional taxable benefit. This amount is indexed annually. The levy does not have to be recovered from employees and is incurred by the employer.

Please note: a levy on trucks applies in the Netherlands, as of 1 July 2026. Since that date, owners of heavy goods vehicles have been required to pay a charge per kilometre driven on most motorways and on certain provincial and municipal roads. The levy rate was reduced in 2026. That reduction will not be carried forward into 2027.



Mobility-related rules have changed significantly in recent years. Make sure you review whether you are applying the revised rules correctly.

Ensure that fines are dealt with on time

If an employee has incurred traffic fines with a company car, it may be the case that you pay the fine upfront and then recover the costs from your employee later. If so, make sure that you recover these costs in that same year. If you pay a fine and do not recover it from the employee, the amount of the fine may constitute wages. This means that you could risk an additional wage tax assessment. Additionally, make sure that this option is explicitly documented in the labour agreement or a company car arrangement. Certain steps may be required in order to offset fines against an employee's wages.

Terminating a lease agreement

Will an employee with a leased company car be leaving your company next year? It may be worth terminating the lease agreement with the leasing company before 1 January 2027. If the employer pays the termination fine and recovers it from the employee, the employee can deduct the amount from the additional taxable benefit, in the form of an own contribution ('eigen bijdrage'). Note that this must be explicitly agreed upon with the employee beforehand.

Please note 1: the additional taxable benefit cannot be a negative amount.

Please note 2: as of 1 January 2027, a new final levy applies to non-zero-emission cars made available to employees. The employer will face a final levy of 12% of the

list price (or market value, in the case of cars older than 25 years). Transitional law applies for most cars made available to employees before that time, expected to end on 17 September 2030. An additional amendment has been proposed, extending the transitional law until 1 January 2031.



Pointer

if you currently offer lease contracts longer than 4 years, discuss with your Baker Tilly advisor whether you need to prepare for the new final levy. It may, for example, be wise not to enter into any agreements for non-zero emission vehicles with a running time beyond 17 September 2030 (or 1 January 2031 if the amendment is approved).

Work-related personal-mobility scheme: reporting and administrative obligations

Employers with 100 or more employees are required to report annually on the CO₂ emissions generated by their employees' commuting and business travel. This reporting obligation, including certain administrative obligations, came into effect on 1 July 2024.

Bear in mind that the report for the next reporting period (1 January 2026 to 31 December 2026) must be submitted no later than 30 June 2027.

Please note: a proposal has been made to amend the reporting requirement with retrospective effect from 1 January 2026, so that only employers with 250 or more employees would be required to report. This amendment has not yet been formally enacted.

Consider offering company bikes as a mobility solution

An increasing number of businesses offer company bikes or lease bikes to their employees. If a bicycle is made

available to an employee, the benefit from private use is set at just 7% of the consumer price. The owner of the bike may be the employer, but businesses increasingly use leased bikes. In the case of a leased bike, a lease company owns the bike. This company also takes care of matters such as insurance and maintenance. The employer pays the company a leasing fee and makes the bike available to the employee.



Pointer

Shared bicycles used for business purposes do not incur an additional taxable benefit.



Read more tips for PIT entrepreneurs in our [Year-end Pointers for Entrepreneurs and Director-Major Shareholders](#)

Work Related Costs Scheme (WKR)

Check and use the remaining discretionary margin

For certain reimbursements and provisions in kind to employees, specific exemptions apply for wage tax purposes. If no exemption applies, a reimbursement or provision in kind can be included in the discretionary margin ('vrije ruimte') of the [Work Related Costs Scheme](#) ('werkkosten-regeling' or 'WKR'). Within the discretionary margin, you can offer your employees reimbursements and provisions in kind, free of tax. Have you not used up all of your discretionary margin? Perhaps you could use it to surprise your employees with an extra special Christmas gift, or to pay out the usual bonus (tax free) as a net amount under the discretionary margin. Take careful note of the conditions which apply in this respect.



Pointer 1

Are you organising a Christmas party? If this party is held at the workplace, this will not reduce the discretionary margin. However, if the Christmas party is expanded to include a meal, a lump sum amount of EUR 4.05 per meal (2026) must be taken into account for the WKR.



Pointer 2

Check whether it is advantageous to apply the group arrangement.



Pointer 3

Are you planning a New Year's party in 2027? By organising this at the workplace rather than an external venue, you can prevent that a large part of the discretionary margin for 2027 is immediately used up.



Our Employment Advisory experts would be happy to explain how to make **optimal use of the discretionary margin in the WKR.**

Make agreements on working from home

Employers can grant employees a tax-free reimbursement for working from home, to a maximum of EUR 2.45 (2026) per day worked from home. If there is a structural pattern of working from home, a fixed reimbursement could also be agreed upon.

Please note: if a tax-free reimbursement for working from home is paid for a particular day, it is not possible to also pay a tax-free reimbursement of the costs of commuting from home to work on that day.



Pointer

Do you offer a working-from-home reimbursement? If so, please ensure correct documentation and administration.

Exemption for employee discounts on company-specific products abolished

From 1 January 2027, the targeted exemption for employee discounts on company-specific products under the WKR will be abolished. As a result, a discount on company-specific products will be treated as taxable wages, unless another targeted exemption applies.



Pointer

Subject to certain conditions, these discounts may still be designated within the discretionary margin of the WKR and provided tax-free.



Please note: this change may have significant financial consequences if you offer this type of discount to your employees. Our specialists can help you assess the impact and determine whether your current employment conditions or benefit arrangements need to be adjusted.

Keep an eye on new rules for innovative start-ups and scale-ups

New tax incentives have been announced for certain innovative start-ups and scale-ups.

Does your company meet the relevant conditions? If so, you may apply to the Netherlands Enterprise Agency (RVO) for a ruling. If you subsequently grant employee participation rights, the income derived from those rights may qualify for favourable tax treatment. Under the proposal, 35% of the gain from employee participation rights would be exempt from taxation. The remainder is taxed through payroll withholding no later than the moment the shares acquired through the options are sold.

Interested in **employee participation schemes**? Our specialists can explain the available opportunities and tax benefits in more detail.

In addition, a new regime will apply in Box 3 of the Dutch personal income tax system. In short, investments in qualifying innovative start-ups and scale-ups held in Box 3 will become subject to a capital gains tax regime from 2028, with taxation taking postponed until realisation.



Find out more about the changes to Box 3 in our [Year-End Pointers for individual taxpayers](#).

Other tax incentives are also available for innovative businesses. For example, read more about the Innovation Box and the WBSO (R&D tax incentive scheme) in our [Year-End Pointers for Entrepreneurs and Director-Major Shareholders](#).

Note the changes to the Early Retirement Scheme (RVU)

Employees who leave employment within 36 months before reaching State Pension Age (AOW age) may qualify for an exemption from the final levy that normally applies to a (deemed) Early Retirement Scheme (RVU). The threshold exemption for this scheme was set to end on 31 December 2025, but it has ultimately been extended and, in certain sectors, increased by €300 per month.

In exchange for these changes, the final levy on RVU arrangements that do not qualify for the exemption will be increased gradually from 52% in 2025 to 65% in 2028. Although the scheme is intended primarily for employees in physically demanding occupations, it is expected that collective bargaining parties will be given considerable freedom in determining how this is applied in practice.

Employment tax credit no longer available on UWV benefits paid through employers

The tax treatment of certain UWV benefits that are paid on by employers will change from 1 January 2027. From that date, the employment tax credit ('arbeidskorting') may no longer be applied to the benefit component of such payments. As a result, affected employees will generally receive a lower net salary.



Pointer

Contact your Baker Tilly HR or payroll advisor if you would like more information about the implications of this change or its administrative processing.



Read more about our Year-end pointers for private individuals, entrepreneurs, director-major shareholders and businesses [here](#).





Year-end pointers 2026



This overview was written with due care and attention, based on the legislative proceedings until 1 October 2026. This overview is intended to be general in nature and should not be construed as specific advice or a comprehensive overview of all changes. A number of topics, pointers, measures, and legislative proposals were not included in this overview. Please note: several measures have not yet been finalised. It is possible that they may be changed during the legislative process. Discuss what the consequences of the proposed changes are for your situation with your advisor.

Do you have any questions? [Contact](#) your Baker Tilly advisor