



# Year-end pointers for Entrepreneurs & Director-Major Shareholders

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 we discuss key points of attention for your director-major shareholders, entrepreneurs and businesses.

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.

## Table of Contents

- ➔ Pointers for all businesses (personal income tax and corporate income tax)
- ➔ VAT Pointers for entrepreneurs
- ➔ Special pointers for entrepreneurs subject to personal income tax
- ➔ Special pointers for businesses subject to corporate income tax
- ➔ Pointers for director-major shareholders

## Pointers for all businesses (personal income tax and corporate income tax)

### Form a provision for large expenditures

If you already know that you will have a large expenditure in 2027 or later, you can under certain circumstances form a provision in 2026. A contribution made to that provision would reduce your taxable profit in 2026. Please note that the future expenditure must stem from (and be attributable to) facts and circumstances occurring in or before 2026. Furthermore, it must also be reasonably certain that the future expenditure will in fact occur. Examples include a transitional payment ('transitievergoeding') which will be due next year, or a claim for damages which arose in the past year, and which will likely need to be paid in the next year. Your Baker Tilly advisor can discuss the conditions and necessary documentation with you.

### Form and utilise a reinvestment reserve

Have you realised a fiscal profit from the sale of a business asset? Do you intend to replace that asset, and have you already formed a reinvestment reserve ('herinvesteringsreserve' or 'HIR') in order to do so? If so, make sure that you document your intention for reinvestment (annually), in writing and including the relevant substantiation. The HIR must be used within a period of three years.



### Pointer

Has the purchase of a new business asset been delayed due to exceptional circumstances, and are you approaching the three-year term? You can ask your tax inspector to extend the period if you have already started with the reinvestment.



## Use the deduction for small-scale investments

If you invest in a business asset, you can under certain conditions make use of the small-scale investment deduction ('kleinschaligheidsinvesteringsaftrek' or 'KIA'). Depending on the investment amount, this tax benefit allows you to reduce the fiscal profit in the year in which you enter into the obligation (e.g., by signing a contract of sale or by accepting a proposal). If you do not start using the business asset in 2026, the KIA is limited to the amount of the downpayment made that year.

| Investment             | Small-scale Investment Deduction (KIA)                                          |
|------------------------|---------------------------------------------------------------------------------|
| Not more than € 2,900  | 0%                                                                              |
| € 2.901 to € 71,683    | 28% of the investment amount                                                    |
| € 71,684 to € 132,746  | € 20,072                                                                        |
| € 132,747 to € 398,236 | € 20,072 less 7.56% of the portion of the investment amount exceeding € 132,746 |
| More than € 398,236    | 0%                                                                              |

**Please note:** if the total investments exceed EUR 132,747, the maximum amount of the KIA decreases. If the total exceeds EUR 398,236, this credit falls to zero. If you risk exceeding these limits by the end of the year, it may be wise to postpone an investment until 2027.



### Pointer 1

Did you not make use of the KIA in a previous year even though you would have qualified for this option? In that case, you can ask your tax inspector for an ex-officio reduction of your tax assessment of that year. This also applies with regard to the Energy Investment Deduction (EIA) and the Environment Investment Deduction (MIA), if and to the extent that you meet the relevant requirements. In 2026, the oldest year for which you can request an ex-officio reduction is 2021.



### Pointer 2

If you sell, within a five-year period, a business asset for which you have previously claimed an investment deduction, an additional taxable benefit for de-investment may apply. Effectively, this involves repaying (part of) the previously received investment deduction. Do you want to sell such a business asset, which was purchased in 2022? If so, consider postponing the sale until 2027.

## Pay attention to the MIA, EIA and Vamil

If you have invested in a business asset which is included on the Environment List 2026 or on the Energy List 2026, you may qualify for the Environment Investment Deduction ('milieu-investeringsaftrek' or 'MIA'), the Energy Investment Deduction ('energie-investeringsaftrek' or 'EIA') or the accelerated depreciation for environmental investments (Vamil). In order to do so, you must notify the investment to the Netherlands Enterprise Agency (RVO) within three months of entering into the investment obligation, generally the moment of the signing of the proposal or order confirmation.



### Pointer 1

Do you want to invest in a business asset which is not included on the Environment List, but which in your view should be on the Environment List 2028? From 1 January 2027 onwards, you can submit a proposal in this regard to the RVO. Contact your advisor for more on the conditions and requirements.



### Pointer 2

The EIA is expected to increase from 40% to 45.5% in 2027. This scheme is designed to encourage investment in qualifying energy-saving business assets. Discuss with your advisor whether it would be beneficial to postpone a qualifying investment until 2027.

## Keep an eye on mobility-related changes and obligations

A number of rules regarding the tax treatment of certain company cars changed in recent years. It may be wise to reconsider the setup of your fleet. For example, read more in our Year-End Pointers for Employers about why you may want to reconsider offering a company car with a long lease-term. Read more about these developments in our [Year-End Pointers for Employers](#).

## Request the tax credit for research and development 2027

Are you planning to carry out research and development activities in 2027 and do you have employees? The Act Promotion of Research and Development ('Wet Bevorderen Speur- en Ontwikkelingswerk' or 'WBSO') may offer opportunities for lowering your (wage) costs. The deadline for requesting an allowance based on the WBSO for entrepreneurs with employees is 20 December 2026.

## Pay attention to changes affecting innovative businesses

On [Budget Day](#), the government announced several proposals aimed at stimulating innovation in the Netherlands. In addition to tax incentives for innovative start-ups and scale-ups, it has, for example, proposed relaxing the lump-sum scheme in the Innovation Box regime.

If this proposal is approved, businesses using the lump-sum method for determining Innovation Box profits will be able to apply the favourable tax rate to profits of up to EUR 100,000, instead of the current EUR 25,000. Under the new rules, the resulting tax saving could increase to as much as EUR 16,800.



### Pointer

One of the requirements to qualify for this scheme, is a WBSO declaration (R&D tax credit approval). Discuss with your advisor whether you are eligible and what steps you need to take to benefit from this arrangement.

## Take changes in real estate rules into account

There are various real estate-related schemes in real estate transfer tax (RETT) and VAT. A number of these schemes have already changed or are set to change in the coming years. Consider, for example, the changed VAT revision rules for investments in real estate, and the possible notification obligation upon the transfer of shares in a real estate legal entity. Our [real estate experts](#) would be happy to discuss these developments with you.

A reduction in real estate transfer tax for residential property that is not owner-occupied is expected to be introduced. In addition to the general transfer tax rate of 10.4%, a rate of 8% already applies to general residential properties, such as holiday homes, second homes and

buy-to-let properties. From 1 January 2027, the rate for non-owner-occupied residential properties is expected to be reduced further to 7%.

The reduced 2% rate for owner-occupied homes and the general 10.4% rate for other types of real estate will remain unchanged.



**Discuss with your advisor which real estate developments may be relevant to you**



### Pointer

Are you selling a residential property to someone who will not occupy it as their main residence? Or are you acquiring real estate investments that fall within the scope of this reduced rate? If so, discuss with your advisor whether it might be beneficial to postpone the sale or purchase until 2027 in order to take advantage of the reduced 7% rate.

**Please note:** A real estate transfer tax exemption has been proposed for housing associations. If approved, an RETT exemption will apply, from 1 January 2027, to transfers of qualifying Services of General Economic Interest (SGEI/DAEB) real estate between housing associations.

## VAT Pointers for entrepreneurs

### Include VAT refund on uncollectible debts in your VAT return

Have you issued an invoice including VAT, but is this debt now uncollectible? If a customer does not pay your invoice (in full, you can claim a (partial) refund of the VAT that you have already paid, from the Dutch Tax Authorities.

You must do this within one year after the payment of the relevant debt has become due (or earlier if it has definitively been established that the debt is uncollectible).

You do not need to submit a separate request to the tax inspector: you can include the amount of the refund in your periodic VAT return. Make sure that you reclaim the VAT in the correct period and under the correct heading in the tax return. If the correct period has already lapsed, you may need to file a supplementary VAT return.

If it becomes apparent at a later stage that the debt, for which VAT was refunded, can be collected after all, you must pay back all of the refunded VAT to the Dutch Tax Authorities through a supplementary tax return.

### Check whether you are exceeding the threshold for distance sales

Do you sell and ship products to consumers in other EU countries? If so, you are in principle subject to the local VAT rules in each of these countries. This may mean that you must submit VAT returns and pay VAT in several countries.

If you are based in the Netherlands, Dutch VAT must be charged and paid, up to the turnover threshold of EUR 10,000. If you exceed that amount of EUR 10,000 in a particular year, you will be liable for VAT in the EU country of

destination, from that moment onwards. In that case, it is possible to register the sales and VAT owed using the One Stop Shop (OSS). This allows you to prevent VAT registration from being needed in every EU country where goods are supplied.



#### Pointer 1

Do you expect that you will exceed the threshold of EUR 10,000 before the end of the calendar year? If so, don't forget to register for the OSS on time and to adjust your systems and prices, where needed.

**Please note 1:** if, in addition to distance sales, you also provide certain electronic services (TBE services) the EUR 10,000 threshold mentioned above applies to the combined total of those supplies of goods and services.



#### Pointer 2

The scheme only has very limited retroactive effect. It is important that you are fully aware of your VAT obligations upfront and take timely action, where needed. Our advisors would be happy to inform you about the VAT consequences of cross-border trade.

**Please note 2:** the OSS scheme will change with effect from 1 January 2027. A number of clarifications and expansions have been introduced as part of the Single VAT Registration (SVR) initiative. In addition, the current call-off stock regime is set to be phased out by July 2029 and replaced by a new arrangement within the One Stop Shop schemes: the transfer of own goods scheme. Your advisor can provide further guidance on these changes.



#### Pointer 3

Check whether you hold any stock of goods in other EU Member States and assess the implications for both the OSS scheme and your local VAT compliance obligations.

#### Prepare for the digitalisation of VAT

Significant changes are expected in the areas of VAT and international trade. Authorities are investing in digital infrastructures and seeking faster access to transaction data. ViDA (VAT in the Digital Age) is an important European initiative in this regard, but it is not the only one.

In the short term, changes are primarily focussed on the One Stop Shop (OSS) scheme. However, further changes will soon follow in the areas of digital reporting requirements, reverse charge rules and, in particular, e-invoicing. Make sure you stay well informed about these developments so you can prepare and transform your business, systems and supply chains on time to meet these new obligations.



#### Pointer

Neighbouring countries such as Germany and Belgium have already started implementing e-invoicing requirements in their legislation and are further advanced in this area than the Netherlands. Suppliers or customers in these countries may expect you to use e-invoicing. Be sure to monitor these developments closely.

#### Pay attention to the consequences of DAC7 for trading on digital platforms

Since 1 January 2023 online platforms must provide the Dutch Tax Authorities with certain data on payments and information regarding sellers on their online marketplace

every year. This leads to more extensive due diligence and administrative obligation for these platforms. If you operate a platform, make sure you are aware of these DAC7-rules and make sure you file the required annual report on time.

**Please note:** the deadline for filing the data regarding the 2026 calendar year is 31 January 2027.

#### Beware of the confluence of VAT and transfer pricing corrections

The VAT treatment of transfer pricing corrections is becoming clearer, partly as a result of European case law such as the *Arcomet judgement*. Transfer pricing adjustments at the end of the year may have VAT implications sooner than before. Our VAT specialists and our transfer pricing experts would be happy to tell you more about these developments.

#### Revise car-related VAT in the final VAT return of the book year

VAT on the purchase, maintenance and use of business cars is in principle deductible, if the car is used for activities that are subject to VAT. However, if a car is also used for private purposes, a correction must be processed in the final VAT return of the book year. Unless you have kept records of the actual private use, this correction amounts to 2.7% of the list price (including VAT and motor vehicle tax). For certain cars, such as cars that have been in use in the business for more than five years, a lower percentage of 1.5% of the list price may apply. Read more about the tax treatment of cars in our brochure '*Tax treatment of a company car*'.



#### Pointer

Keep track of which cars fall under the lower percentage and check this before filing the return.

#### Remember to file a supplementary VAT return on time

If it follows from your administration that too much or too little VAT has been paid, this should be corrected by means of a supplementary VAT return, if the total over- or underpayment is more than EUR 1,000 per period. This must be corrected within 8 weeks of noticing the over- or underpayment.

**Please note:** the Dutch Tax Authorities can compare the VAT paid with the corresponding item in the corporate income tax return. Make sure any necessary supplementary returns are filed (and paid after receipt of the additional assessment) on time.



#### Pointer 1

If the amount of the correction is less than EUR 1,000 VAT in a reporting period, you may include the correction in the next VAT return, instead of filing a supplementary return.



#### Pointer 2

If you still need to submit a supplementary VAT return for 2021, do so before 1 January 2027, as any correction relating to 2021 will be statute-barred after that date.

#### Process BUA-correction in the final VAT return of the book year

If you have deducted VAT on promotional gifts, gifts for employees, or canteen expenses, you may have to correct this. If the total amount (excluding VAT) per employee or business relation exceeds EUR 227 in any year, a so-called

'BUA-correction' must be applied for that particular employee or relation.



#### Pointer

Baker Tilly has developed a useful tool for determining the amount of a potential BUA-correction. Please reach out to our [VAT experts](#) for more information.

#### Provide 90%-declaration within 4 weeks of the end of the book year

Have you acquired real estate in 2025, and did you and the seller jointly opt for a VAT-taxed sale? If so, you must provide the seller and the Dutch Tax Authorities with a so-called 90%-declaration before 28 January 2027, assuming your book year matches the calendar year. By doing so, you confirm that the real estate was used for activities for which you had at least a 90% right to deduct VAT. If you do not meet this 90%-criterion in the first or second book year following the year of sale, the supply of the property is retroactively seen as VAT-exempt. This may have significant consequences for the seller's right to VAT deduction. A provision on this matter will often have been included in the sales agreement.

#### If desirable, request VAT exemption for small businesses (KOR)

If your annual turnover does not exceed EUR 20,000 (excluding VAT) you may make use of the VAT exemption for small businesses ('kleineondernemersregeling' or 'KOR'). By applying the KOR, you are exempt from charging VAT to customers, whereas you yourself lose your right to deduct VAT. If you wish to apply for the KOR in 2026, be sure to register with the Dutch Tax Authorities on time. Bear in mind that there is a processing time of at least 4 weeks; to apply the KOR as of 1 January 2027, you should therefore

send the relevant information to the Dutch Tax Authorities before 1 December 2026 at the latest.



#### Pointer 1

When deciding whether or not to use the KOR, you should carefully weigh all of the relevant factors. This may include considering the impact on your customers' right to deduct VAT, as they may prefer a regular invoice including VAT.



#### Pointer 2

Since 1 January 2025, it is possible for small businesses in the Netherlands to apply the KOR in other EU countries, too. This may prevent possible VAT obligations in other EU countries. Discuss with your advisor whether you are eligible for this scheme.

#### Keep an eye on the introduction of new European regulations

Various initiatives are being rolled out at the European level to meet climate targets. An example is the [Carbon Border Adjustment Mechanism \(CBAM\)](#) which was introduced in 2024 (and has since seen a number of simplifications). This scheme is of significant importance to certain importers of carbon-intensive goods produced outside the EU. Importers that are within scope of the scheme must submit their first annual declaration by September 2027 at the latest. The sale of CBAM certificates will start on 1 February 2027.

#### Note the new revision period for major investments in real estate

Under current VAT rules, it is possible to limit the VAT burden using the so-called "short-stay" regulations. For example, by renting out homes subject to VAT for a short period after a major renovation, a VAT entrepreneur may

deduct the VAT on the renovation costs. If the entrepreneur subsequently switches to VAT-exempt residential rentals, the VAT deduction is not reversed.

As of 1 January 2026, the VAT revision scheme which already applies to (im)movable investment goods (including buildings), also covers services of at least EUR 30,000 (excluding VAT) to real estate, such as renovations and major maintenance. As a result, the VAT deduction mentioned above will apply, but must be adjusted based on the revision rules.



#### Pointer

Make sure you are aware of these rules and adjust your administrative processes accordingly.

## Special pointers for entrepreneurs subject to personal income tax

### Pay attention to the hours criterion!

For the purpose of the personal income tax, entrepreneurs can make use of several fiscal measures which can reduce the taxable profit. One example is the deduction for entrepreneurs. To qualify for this, the entrepreneur will need to have spent at least 1,225 hours on his business (and be able to demonstrate this, for example by keeping a register of the hours). Check whether you meet the hours criterion in 2026.

### Take account of changes to available tax allowances

A number of tax allowances & deductions available to income tax entrepreneurs are expected to change next year. The self-employed deduction will be reduced from EUR 1,200 in 2026 to EUR 900 in 2027. The start-up deduction (EUR 2,123 in 2026) will decrease to €10 in 2027 and will be abolished in 2028. In addition, several tax measures that received negative evaluations will be phased out, including the assisting spouse deduction and the business cessation deduction. Where relevant, take these changes into account in your financial forecasts and provisional tax assessments.



#### Pointer

The tax-free mileage allowance has been increased, with retrospective effect from 1 January 2026.

If you are a PIT entrepreneur, you may also pay yourself a tax-free reimbursement for business mileage and deduct this expense from your taxable business profit. In that case, you bear the costs of items such as maintenance and fuel yourself, and any VAT on those

costs is not recoverable. Read more about this in our [Year-End Pointers for Employers](#).

### Offset a 2017 business loss for personal income tax

If your business has a loss for personal income tax purposes from 2017, which has not yet been offset, 2026 is the last year in which this loss can be utilised. After 2026, the loss will expire and you will no longer be able to offset it against future profits.



# Special pointers for businesses subject to corporate income tax



[Click here](#) to go directly to special pointers for director-major shareholders

## Request a preliminary corporate income tax assessment on time

If a corporate income tax assessment is issued more than six months after the end of the tax year (generally speaking this is on 1 July), the Dutch Tax Authorities impose legal interest. The applicable interest rate is currently 5% (2026). By requesting a preliminary corporate income tax return, you can pay the taxes owed in an earlier stage and prevent or reduce the amount of legal interest due. Your tax advisor can discuss with you whether it is necessary to request an (adjusted) preliminary assessment for 2025 or for earlier (outstanding) years.



### Pointer

Can you already estimate the taxable profit for the tax year 2026, in early 2027? If so, consider requesting a preliminary assessment. If the estimated amount of tax turns out to be too high or too low, you can always request that the preliminary assessment be adjusted.

## File your annual accounts on time

The annual accounts of a limited liability company ('BV') must be filed within eight days after the formalisation of those annual accounts. In any case, the annual accounts must be filed ultimately 12 months after the end of the book year, at the latest. This means that the ultimate filing date for the annual accounts for the book year 1 January - 31 December 2025, is 31 December 2026.



### Pointer

If there is a risk of bankruptcy, the timely filing of the annual accounts is of particular importance. Failure to do so can result in personal liability for the director, for debts of the company which cannot be paid through the liquidation.

## Check transfer prices and transfer pricing obligations

Affiliated parties must take into account at arm's length prices when doing business with each other. This applies both to internal domestic situations and to cross-border ones. Depending on the amount of revenue of a group with international operations, [non-prescriptive or formal documentation and reporting obligations](#) may apply. Your advisor can discuss with you whether this is the case for your company or group.



### Pointer 1

If a Dutch company is a part of an international group with a consolidated group revenue of EUR 750 million or more, a Country-by-Country Report ('CbCR') must be submitted. The Dutch BV can be faced with this obligation. In the case of normal book years, this report must be filed by 31 December of the subsequent year, at the latest.



### Pointer 2

If a Dutch company is part of an international group with a consolidated group revenue of EUR 750 million or more, a Country-by-Country notification needs to be submitted. Among other things, this notification must state which entity will submit the CbCR. This notification obligation falls upon every Dutch BV that belongs to such a group, but the notification can be submitted jointly. This notification must be submitted on the last day of the book year of the parent company of the international group, at the latest. The book year of

the parent company may differ from the book year of the Dutch BV. Take this into account when determining the notification deadline.

**Please note 1:** the first reporting deadline for [the new Public CbCR \(PCbCR\)](#) is approaching. This is a separate obligation from Country-by-Country Reporting in the context of Transfer Pricing. In many cases, the first PCbCR deadline is 31 December 2026.

**Please note 2:** in light of your corporate income tax return, bear in mind other relevant documentation requirements, such as [ATAD2](#) for Dutch companies that are part of an international group. Your advisor can tell you more about this..

## Keep an eye on changing rules for offsetting losses

Changes to the loss relief regime may be imminent, as a result of a recent Dutch Supreme Court ruling on the treatment of latent losses following a change in ownership. Exactly what form these changes will take is not yet known. It may become necessary to quantify latent losses prior to a sale, or even to monitor them on an ongoing basis.

## Pay attention to tax treatment of interest

Interest expenses are not always fully deductible for corporate income tax purposes. The general interest deduction limit provides that if a company's interest expenses exceed its interest income, the balance of interest expenses is deductible up to the higher of either 24.5% (2026) of the fiscal EBITDA, or EUR 1 million.

**Please note:** at the European level, there is a push to relax this so-called earnings stripping measure. It is possible that the Dutch government may soon introduce broader changes to the interest deduction limitation rules, but for now no generic changes have been proposed..



#### Pointer

On **Budget Day**, a targeted relaxation for housing corporations was announced. If this measure is approved, the general interest deduction limitation will no longer apply to housing corporations from 1 January 2028.

#### Request to file tax return in a foreign currency, on time

In some cases, it can be helpful to file a Dutch tax return in a currency other than the euro. This could for example be the case if a Dutch company belongs to an international group. In order to do this from 2027 onwards, you must submit a request to the tax inspector on the basis of the 'Regeling functionele valuta' ('Functional currency regulation') before 1 January 2027.

**Please note:** in principle, this choice is made for a ten-year time period. Be sure to discuss relevant matters such as the additional requirement for the annual accounts, with your advisor.

#### Check whether your healthcare institution still meets the requirements for the exemption for healthcare

Under certain conditions, healthcare institutions can make use of the exemption for healthcare. This means that they are not liable for corporate income tax. It is important to monitor whether the activities requirement ('werkzaamheidsvereisten') and the requirement for the destination of profits ('winstbestemmingseis'), amongst other things, have been met continuously. If a change in the Articles of Association is needed in light of the latter requirement, do so before the end of the calendar year.

#### Pay attention to donations made by your company

As a director-major shareholder, you can choose to make a donation from the BV, rather than from private means.

A donation from the BV is deductible from the profit if the donation is made to a public benefit organisation ('ANBI') or a social advocacy organisation support foundation ('steunstichting SBBI'). This deduction is capped at 50% of profits with a maximum of EUR 100,000.

If the gift exceeds these thresholds or if the receiver is not an ANBI or a steunstichting SBBI, the excess is treated as a withdrawal by the shareholder.



**Innovative start-ups and scale-ups face favourable new tax schemes in 2027, including new rules for employee participation schemes. Your advisor can tell you more.**

#### Monitor developments regarding the carried interest scheme

The carried interest scheme ('lucratiefbelangregeling') is intended to ensure that excessive yields, which constitute remuneration for work, are taxed in Box 1 (personal income tax). This may for example concern remuneration schemes for (senior) management in the private equity sector. These schemes were previously designed so that management could invest relatively small amounts in the company they work for, with a high potential yield. Before the introduction of the carried interest scheme, such rights were often awarded in the form of shares which are generally taxed in Box 3 based on a notional yield.

The carried interest scheme is currently under discussion. As of 2028, the effective tax rate for indirectly held carried interests will increase (by applying a multiplier to the

taxable base) from 24.5% to 28.45% in the first bracket of Box 2, and from 31% to 36% for income in the second bracket.



#### Pointer

Is the carried interest scheme applicable to you? If so, make sure you're aware of the various developments. Your Baker Tilly advisor can tell you more.



#### Pointer

Do you want to maintain better control of your company's tax position? A Tax Control Framework can help you stay on top of things. Our experts would be happy to help you with a tailor-made solution.

# Pointers for director-major shareholders

## Assess dividend distributions

In 2026, income from substantial shareholding is subject to personal income tax in Box 2 at a tax rate of 24.5% for income up to just over EUR 68,000 and a rate of 31% for income above that amount. This bracket limit will be indexed in 2027, expectedly rising to just over EUR 70,000. Under the initial 2027 Tax Plan, the tax rates in Box 2

were not changed. However, later that month the Cabinet proposed new plans, including a 4 year reduction of the top rate by 1.8%. Box 2 income such as dividends from an own company would then be subject to a tax rate of 29.2% in the top bracket, rather than the current 31%. Distributions below the bracket limit remain subject to the current 24.5% rate.

**Please note 1:** the proposal for a lower top rate has not yet been approved. If you intend to perform a dividend distribution, please discuss with your advisor whether it is advisable postpone a large dividend until after 31 December 2026, or to spread this out over multiple years so as to make use of the lower bracket multiple times.

**Please note 2:** a BV may be limited in the amount of dividend that can be distributed. Discuss the possibilities for distributing dividends with your advisor.

**Please note 3:** a dividend distribution in 2026 may lead to an increased taxation in Box 3 in 2027.

**Please note 4:** discuss the formalities with your advisor. If needed, request a (revised) provisional assessment for personal income tax, to prevent or mitigate legal interest.

## Chart your debts owed to your own company

Do you owe an outstanding (mortgage) debt to your own company? There are a number of reasons why it would be good to reassess and chart these debts. For example, the deduction of mortgage interest may be limited. In 2026, the interest on a qualifying own-home loan can be deducted at a maximum tax rate of 38.16% in Box 1 of the personal income tax. A non-qualifying own-home loan or other type of debt owed to your company will however fall in Box 3, and therefore have a negative yield of about 2.7% (provisional percentage for 2026).

In addition to this, the [Wet Excessief lenen bij eigen vennootschap](#) ('Act Excessive borrowing from own company') entered into force on 1 January 2023. Director-major shareholders who (together with among others their partner) owe a debt exceeding EUR 500,000 (2026) to their own company, are taxed in Box 2 over the amount exceeding that threshold. Mortgage debts owed to the own company for the financing of an own-home, are in principle not taken into account for the purpose of this Act.

**Please note 1:** the reference moment for excessive debts in 2026 is 31 December 2026. Discuss with your advisor whether it is desirable to decrease your debts, for example by means of a dividend distribution.



### Pointer 1

Does your company owe you money? This receivable will often be included in Box 1 of the personal income tax. If your Box 1-receivable is repaid to

you before the reference date for Box 3 (1 January of every year), your taxable assets in Box 3 will increase in the following year.



### Pointer 2

Do you want to temporarily borrow a sum of money from your company? Consider postponing this until after 31 December 2026 if the new loan leads to your debts exceeding the threshold for the Act Excessive borrowing from own company. Similarly, if you have emigrated and received a payment deferral for a protective assessment, taking out a loan in 2026 may be less favourable than doing so in 2027. Your advisor would be happy to elaborate on this matter.

**Please note 2:** shortly after Budget Day, a proposal was presented to substantially reduce the threshold for excessive borrowing in a series of steps. Although the first relevant reference date, should this reduction be approved, is not until 31 December 2027, it is advisable to assess now whether repayment of excessive loans would be appropriate. Your advisor can provide further guidance on this.

## Assess your customary wages

A director-major shareholder who carries out activities for his company, must pay himself wages. Based on the customary wages arrangement, the minimum amount in 2026 is the highest of the following three amounts:

- 100% of the wages that would be paid in the most comparable employment situation;
- the wages of the highest-earning employee of the company or group;
- a minimum amount of EUR 58,000 (2026 amount).



#### Pointer

It is prudent to pay extra attention to determining (and documenting) the customary wages. Your advisor can help you determine the customary wages. Bear in mind related matters such as your spending needs, dividends and mortgage interest deduction.

#### **Make use of tax credit from substantial shareholding before 2027**

Did you have an unused loss from a past substantial shareholding, without having a substantial shareholding in 2025 and 2026? If so, you can convert this loss into a tax credit in 2026. The amount of this credit is 24,5% of the unused loss from the substantial shareholding. The credit can be offset against income in Box 1 for the tax years 2026 up to and including 2033..

#### **Discuss your business succession plan**

There are no changes to the business succession scheme ('BOR') as of 1 January 2027. However, the end of the year is still a good time to check whether your business succession plans still match your wishes. Your advisor would be happy to discuss whether changes in rules or circumstances may affect your business succession plans, and whether there are any steps you should take before the end of 2026.

#### **Keep an eye on developments in mobility**

A great deal is set to change in the area of mobility over the coming years. In addition to new measures such as the final levy for non-zero-emission cars and the truck levy, which will affect employers and entrepreneurs, director-major shareholders (DGAs) and employees who drive a 'youngtimer' car will also face new transitional arrangements. Read more about these developments in our [Year-End Pointers for Employers](#).





## 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