Monthly Newsletter on Regulatory and Legislative Changes

OCTOBER 2026

CHANGES TO THE LEGISLATIVE FRAMEWORK

On making amendments to the Law of Georgia "On Organizing Lotteries, Gambling and Other Prize Games" No. 1904/1-VIმს-XIმპ, the Law of Georgia "On Licenses and Permits" No. 1904/2-VIმს-XIმპ, the Law of Georgia "On License and Permit Fees" No. 1904/3-VIმს-XIმპ, the Law of Georgia "On Gaming Business Fee" No. 1904/4-VIმს-XIმპ and the Tax Code of Georgia No. 1904/5-VIმს-XIმპ (adopted: 28.10.2026, effective: 30.10.2026)

- The package introduces a new licensed gambling activity, the international gambling tournament. Such a tournament is a game conducted by the holder of a casino permit at a club table, with a prize fund guaranteed in advance by the organizer, in which at least 80 per cent of all participants are foreign citizens. It may be held either at the casino or outside it. The organizer may earn income from the tournament, provided that the pre-declared, guaranteed prize fund is actually played out; unless a law or a Government resolution provides otherwise, the existing rules on gambling tournaments apply.
- A separate permit is required to organize international gambling tournaments. It may be issued only to a casino permit holder, is valid for the remaining term of the underlying casino permit and is cancelled automatically if the casino permit is cancelled. The permit fee is GEL 100,000 per year; the first-year fee is paid before the permit is issued, in proportion to the days remaining until the end of the current year of the underlying casino permit.
- In addition to the standard permit documents, the applicant must submit to the Revenue Service:
  1. the tournament rules, including the name, venue and exact schedule of the tournament, the amount and formation of the guaranteed prize fund, entry fees and commissions, the minimum and maximum number of players, the club tables to be used, the method of determining winners, the prize distribution and payout terms, the player registration and identification procedure and a complaint procedure with a review period of no more than 30 calendar days;
  2. a financial guarantee covering the prize fund, in the amount set by an act of the Government.
- The permit holder must obtain the Revenue Service's consent before each new tournament by submitting its rules, and the Government may set additional permit conditions. The permit may not be issued where a manager, partner or beneficial owner has an unexpunged conviction for an intentional economic crime or an intentional serious or particularly serious crime.
- Under the Tax Code, winnings received by an individual from an international gambling tournament are taxed at 20 per cent, while the winnings of foreign citizens from a tournament whose prize fund exceeds GEL 3,000,000 are exempt. The organizer acts as a tax agent when paying winnings to individuals. Where a club table is used solely for an international tournament with a prize fund above GEL 3,000,000, no gaming business fee is payable for that table, whether or not the organizer earns income from the tournament. The general gaming business fee for each club table is GEL 4,000–14,000 per quarter.
- The holder of an international gambling tournament permit is subject to a fine of GEL 50,000 for violations under Article 37^1 of the Law, and a separate fine of GEL 50,000 applies for late payment of the permit fee. If the permit holder still fails to meet the permit conditions after the fine for late payment has been imposed, the permit is cancelled.

On making amendments to the Tax Code of Georgia No. 1888-VIმს-XIმპ (adopted: 15.10.2026, effective: 16.10.2026)

- The amendment extends the special VAT exemption under Article 309(79) of the Tax Code, which applies to the supply of immovable property and related construction and installation services in buildings that

qualify for this transitional regime. The exemption now covers supplies made between 1 January 2015 and 1 January 2033 (previously 1 January 2029), and the act commissioning the relevant building must be issued by the competent authority before 1 January 2033.
- The law also restates the special limitation periods for exempt transactions carried out under Article 309(79) and (80) in reporting periods from 1 January 2015 to 1 January 2030. The limitation period is 18 years for transactions in 2015 and decreases by one year for each subsequent year, being 8 years for 2025, 7 years for 2026, 6 years for 2027, 5 years for 2028 and 4 years for transactions carried out in 2029.

On making amendments to the Organic Law of Georgia "On the National Bank of Georgia" No. 1889-VIმს-XIმპ (adopted: 15.10.2026, effective: 16.10.2026)

- The amendments create the legal basis for a digital form of the national currency. The definitions of "money notes" and "issuance" now expressly cover Lari banknotes and coins issued in digital form. The National Bank of Georgia (NBG) has the exclusive right to produce and issue Lari banknotes and coins and their digital versions and holds the copyright in them. Digital Lari put into circulation by the NBG constitute its unconditional liability at nominal value, the NBG controls the stock of both cash and digital money and sets their issuance plan, and the issuance of Lari (including in digital form) directly to finance the state budget deficit is prohibited. The law does not set a date for the introduction of a digital Lari.
- The requirements for members of the NBG Council have been tightened. A member must be a Georgian or foreign citizen of distinguished integrity, a professional in economics, finance, information technology or another relevant field, and have at least 10 years of relevant professional experience; no more than two members may come from fields other than economics, finance and IT. Council members elected before the amendments entered into force are not subject to these requirements until their term expires.
- The NBG Council may invite a sector expert to join the Monetary Policy Committee and set the expert's qualification requirements, selection procedure and remuneration. Such an expert is bound by confidentiality and may not be an employee, a direct or indirect shareholder, or a supervisory or management board member of a financial sector entity or a related legal entity. Monetary policy decisions are taken by vote of the President, the First Vice-President and the Vice-Presidents, by a majority of those present, with the President having the casting vote.
- Decisions of the NBG commission that reviews disputes in the payment sector may be appealed to the Administrative Chamber of the Tbilisi City Court within one month of official notification; the appeal does not suspend the decision.

On making amendments to the Law of Georgia "On Payment System and Payment Services" No. 1890-VIმს-XIმპ (adopted: 15.10.2026, effective: 16.10.2026)

- Customer funds held by a payment service provider must be kept separately from the provider's own funds on a nominee holding account. A registered payment service provider that is a participant in a significant (systemically important) payment system may instead place customer funds in its account at the NBG, under rules to be set by the NBG, including the amount of funds to be placed.
- The law expressly prohibits the use of customer funds as security for the payment service provider's own obligations. Decisions of the NBG dispute review commission may be appealed to the Tbilisi City Court within one month of their delivery, without suspending their effect.

On making amendments to the Law of Georgia "On Energy and Water Supply" No. 1903-VIმს-XIმპ (adopted: 28.10.2026, effective: 29.10.2026)

- The amendment authorizes the Georgian National Energy and Water Supply Regulatory Commission (GNERC) to set, for transitional periods, household tariffs that depend on the volume consumed. Until 1 January 2036, GNERC may allocate the cost of water supply services among different consumer categories in different proportions and/or set different water supply tariffs for household consumers depending on consumption. Until 1 January 2038, it may set different natural gas tariffs for household consumers depending on consumption.
- The power to allocate water supply costs among consumer categories was previously due to expire on 1 January 2027. The law itself does not set consumption thresholds or tariff levels; these are to be determined by GNERC in its tariff decisions.

On making amendments to the Law of Georgia "On Enforcement Proceedings" No. 1879/1-VIმს-XIმპ, the Code of Administrative Offences of Georgia No. 1879/6-VIმს-XIმპ and related laws (adopted: 13.10.2026, published: 16.10.2026, substantial part effective: 01.11.2026)

- From 1 November 2026, the Enforcement Police operates as a department of the National Bureau of Enforcement, staffed by enforcement police officers who are professional civil servants holding special state ranks. Its tasks include assisting enforcement officers so that enforcement actions are carried out safely, preventing unlawful acts and, where necessary, applying coercive measures, maintaining public order during enforcement actions and protecting the Bureau's premises. Officers may use body-worn video and audio equipment and are subject to restrictions, including on political activity and on taking part in gambling.
- A private enforcement officer may request the assistance of the Enforcement Police Department, which must respond within 5 working days as to whether it can provide the service. If the Department agrees, the private enforcement officer must pay in advance a fee set by order of the Minister of Justice according to the category of enforcement action. The Minister of Justice has approved the new statutes of the National Bureau of Enforcement and of the Enforcement Police Department and the remuneration rules for enforcement police officers.
- Under the accompanying amendment to the Code of Administrative Offences, authorized officials of the Enforcement Police Department may carry out personal searches and inspections of items in administrative offence proceedings.

On making amendments to the Law of Georgia "On the Structure, Powers and Rules of Operation of the Government of Georgia" No. 1905/1-VIმს-XIმპ (adopted: 28.10.2026, effective: 28.10.2026)

- A First Deputy Minister or Deputy Minister may now simultaneously head a legal entity of public law or a state sub-agency within the field of governance of the relevant ministry. A First Deputy Minister or Deputy Minister may also hold, concurrently, the position of Special Representative of the Prime Minister of Georgia.

On Making an Amendment to the Law of Georgia "On Combating Corruption", No. 1905/2-VIმს-XIმპ (adopted: 28.10.2026; effective: 28.10.2026)

- The Law amends the incompatibility rules for public servants in Article 13(2) of the Law of Georgia "On Combating Corruption". As a general rule, a public servant may not hold another position in any public institution. Until now, the only exception to this rule was for the Executive Director of the Pension Fund of Georgia, who may also sit on the Fund's Governing Board.
- Under the amendment, a first deputy minister or deputy minister may now also head a legal entity of public law that falls within the ministry's area of governance or is under its state control. The same applies to a state sub-agency within the ministry's area of governance. The deputy minister may hold this role at the same time as, or combined with, the deputy minister post.
- The amendment also allows a public servant who acts as Special Representative of the Prime Minister of Georgia to hold another position in a public institution.

LAWS EFFECTIVE FROM OCTOBER 2026

On making amendments to the Law of Georgia "On Funded Pensions" No. 1861/1-VIმს-XIმპ, the Administrative Procedure Code of Georgia No. 1861/2-VIმს-XIმპ, the Code of Administrative Offences of Georgia No. 1861/3-VIმს-XIმპ and the Law of Georgia "On Enforcement Proceedings" No. 1861/4-VIმს-XIმპ (adopted: 16.09.2026, liability provisions effective: 15.10.2026)

- The funded pension package grants a conditional amnesty for unpaid fines and restructures the sanctions applicable to employers. The new liability regime entered into force on 15 October 2026. Failure to make a pension contribution is now sanctioned by a fine of GEL 300. The fine is cancelled if, within 10 working days of its imposition, the employer pays in full the unpaid contribution and the lost return accrued on it.
- The lost return is charged on the unpaid or late contribution from the day after the payment deadline at the NBG monetary policy rate plus 5 percentage points for each day of delay, independently of the fine, and stops accruing only once the contribution is paid in full. Under the amended Law on Enforcement Proceedings, it continues to accrue even after enforcement proceedings have started, and decisions of the Pension Agency imposing fines, unpaid contributions and lost return are directly enforceable.
- A fine may be imposed no later than six months after the violation is identified, and a decision imposing a fine may be sent for enforcement within two years of its adoption. Minor discrepancies are not treated as violations: for periods before 1 May 2025, a difference of up to GEL 1 per participant in a monthly check, and for periods after 1 May 2025, cases where the employer's total monthly contributions do not exceed GEL 1.
- Decisions of the Pension Agency may be appealed to the new Dispute Review Service within 30 calendar days of delivery, and the Service's decision may in turn be challenged in court within 30 calendar days. Under the new chapter of the Administrative Procedure Code, where a bank, employer or other person fails to provide information requested by the Pension Agency during an inspection, a judge of the Tbilisi City Court may order its disclosure; the order may be appealed within 48 hours, and the appellate court decides within 10 days, with no further appeal. Instalment agreements for unpaid contributions will become available from 1 June 2027.

On making amendments to the Code of Administrative Offences of Georgia No. 1523-VIმს-XIმპ (adopted: 28.04.2026, effective: 01.10.2026)

- The amendment tightens the sanctions for placing or selling used tires, ferrous and non-ferrous scrap metal, end-of-life vehicles and their parts, and flammable, explosive or dust-generating materials. Placing or selling such goods in places not designated for this purpose by the relevant municipal council is now punishable by a fine of GEL 2,500 for individuals and GEL 5,000 for legal entities.
- Placing or selling such goods in designated places but in breach of the rules set by the municipal council is punishable by a fine of GEL 1,000 for individuals and GEL 2,500 for legal entities.

On making amendments to the Tax Code of Georgia No. 1874-VIმს-XIმპ (adopted: 30.09.2026, effective: 30.09.2026) and Order of the Minister of Finance of Georgia No. 318 of 8 October 2026 on making amendments to Order No. 996 of 31 December 2010 "On Tax Administration" (adopted: 08.10.2026; effective: 09.10.2026)

- The taxable property (other than land) of an individual is now exempt from property tax where the income received by that individual's family in the previous calendar year does not exceed GEL 100,000. For individuals who do not qualify for the exemption, the tax rate on non-land property is set at 0.8–1 per cent of its market value at the end of the previous year.
- The new rules apply to the property tax on property that must be declared in 2026. Order No. 318 of the Minister of Finance has accordingly updated the individual property tax declaration form, in which the declarant must now indicate whether the family's total income for the previous year exceeds GEL 100,000.

CHANGES TO GOVERNMENT RESOLUTIONS AND SUBORDINATE NORMATIVE ACTS

On amendments to Order No. 34 of the Minister of Finance of Georgia of 28 January 2011 "On the Approval of Interest Rates for the Purposes of the Tax Code of Georgia" (Order No. 305, adopted: 01.10.2026, effective: 02.10.2026)

- For the purposes of Article 98²(1)(e) of the Tax Code, interest paid by an enterprise on a loan received from any person other than a licensed banking institution or a registered microfinance organization is treated as an expense not related to economic activity to the extent that it exceeds 24 per cent per annum. For loans from banking institutions and registered microfinance organizations, the contractual interest rate applies.
- In practice, companies financed through shareholder or other non-bank loans should review their interest rates, since interest above the 24 per cent threshold falls within the profit tax base as an expense not related to economic activity.

On the approval of the Rules on Reporting under the CRS Multilateral Competent Authority Agreement and on the Control of Compliance by Reporting Financial Institutions (Order of the Minister of Finance No. 342, adopted on 30 October 2026, effective from 2 November 2026)

- The Order replaces Order No. 125 of 5 April 2023 and approves two sets of rules: updated rules on reporting financial account information under the Common Reporting Standard (CRS) and new rules on how the Revenue Service controls compliance by reporting financial institutions.
- Reporting financial institutions must submit the required information, including on undocumented accounts, after the end of the calendar year and no later than 30 June of the following year, using the list of reportable jurisdictions published on www.rs.ge as of 20 May. Where there are no reportable accounts, a nil report must be filed. Reports may be resubmitted without limit until 20 September, with only the last submission taken into account; after that date, errors are corrected through a corrected report. A high-value account is a pre-existing individual account with an aggregate balance or value exceeding USD 1,000,000, and the use of third-party service providers does not shift responsibility from the financial institution.
- The Revenue Service may carry out risk-based analytical procedures, behavioral measures (phone calls, questionnaires, requests for clarification and reminder letters), desk audits and on-site audits. A five-year period counted from the day after the reporting deadline is subject to control. Requests for additional information must allow at least 15 calendar days; on-site audits require at least 10 working days' prior notice and must start within 30 days of notification. Identified violations are documented in a tax offence report under Article 279² of the Tax Code, and payment of the fine does not release the institution from the obligation to remedy the breach. Decisions may be appealed within 30 days.

On amendments to Order No. 996 of the Minister of Finance of Georgia of 31 December 2010 "On Tax Administration" (Order No. 306, adopted: 01.10.2026, effective: 01.11.2026, and Order No. 332, adopted: 26.10.2026, effective: 01.11.2026)

- Order No. 306 updates the forms of the VAT return and the related annexes. When a return is corrected, separate lines must now show the positive difference (increase) and the negative difference (decrease) between the VAT amounts in the original or previous corrected return and the corrected return.
- Under Order No. 332, the Head of the Revenue Service may, by an individual administrative act, establish a special form and procedure for recording the supply, movement and stock of particular goods for certain categories of taxpayers. Where such a form has been established, a document drawn up in accordance with it is recognized as a document confirming the expense for the relevant transactions. Taxpayers to whom such a form applies must still comply with other legal requirements and issue any other required accounting documents.

On amendments to Government Resolution No. 96 of 30 March 2010 "On the Approval of Fees and Rates for Services Provided by the LEPL Revenue Service" (Resolution No. 508, adopted: 26.10.2026, effective: 01.11.2026) and to Order No. 257 of the Minister of Finance of 29 August 2019 (Order No. 341, adopted: 30.10.2026, effective: 01.11.2026)

- New Revenue Service fees apply to the clearance of certain energy goods placed under the re-export or transit procedure: GEL

90 per tonne for liquefied gas classified under HS heading 2711 and GEL 40 per tonne for coal classified in Chapter 27 of the Commodity Nomenclature. The general GEL 50 fee for clearance under a re-export declaration continues to apply to other goods.
- The new fees do not apply where the goods are carried exclusively by rail and/or sea (and, for liquefied gas, by pipeline) or where a EUR.1 certificate of preferential origin or an origin declaration is submitted. The fee must be paid no later than the moment the goods leave the customs territory of Georgia, and it does not apply to goods imported before 1 November 2026. Order No. 341 has added corresponding codes to the customs declaration classifier.

On amendments to Order No. 257 of the Minister of Finance of Georgia of 29 August 2019 "On the Approval of Instructions on the Movement and Clearance of Goods in the Customs Territory of Georgia" (Order No. 338, adopted: 27.10.2026, effective: 04.11.2026)

- The exchange rate shown in customs declarations, and the conversion of customs value into Lari, are now based on the NBG official rate on the day the declaration is registered or the day the customs and/or tax liability arises. A new classifier code 608 has been introduced to indicate the date on which the liability arises where it does not coincide with the date of registration of the declaration.

On amendments to Order No. 10/04 of the President of the National Bank of Georgia of 11 February 2011 "On the Approval of the Rule on Compliance with Minimum Reserve Requirements" (Order No. 245/04, adopted: 20.10.2026, effective: 21.10.2026)

- Fifty per cent of the amount of foreign currency-denominated certificates of deposit issued by a commercial bank is now excluded from the attracted funds on which minimum reserve requirements are calculated. Banks must apply the new rule when calculating minimum reserves from 3 November 2026 and comply with the resulting requirements from 3 December 2026.

On amendments to Resolution No. 1 of the Georgian National Communications Commission of 27 June 2003 "On the Approval of the Rules Regulating the Activities of the Georgian National Communications Commission" (Resolution No. 8, adopted: 29.10.2026, effective: 30.10.2026)

- The amendments revise the merger control rules applied by the Communications Commission under the Law of Georgia "On Competition" in the communications sector. A concentration must be notified to the Commission where the combined annual turnover in Georgia of the parties exceeds GEL 20 million in the financial year preceding the notification obligation and at least two parties each have an annual turnover exceeding GEL 5 million. Notifiable concentrations may be implemented only after the Commission has cleared them, where applicable subject to structural and/or behavioral remedies.
- The Resolution defines the parties to a concentration for each type of transaction (mergers, acquisitions of sole or joint control and joint ventures) and clarifies how the turnover of groups and of acquired business units is calculated. Several related transactions between the same persons within two consecutive calendar years are treated as a single concentration, to be notified before the last transaction.
- The Commission checks the notification for completeness within 3 working days and must review it within 25 working days of the start of the review. A non-horizontal concentration is presumed not to restrict competition significantly where the parties' market share in each relevant market does not exceed 30 per cent and/or the Herfindahl-Hirschman Index (HHI – market concentration index) is below 2,250, unless specific risk factors listed in the Resolution are present.

On amendments to Government Resolution No. 245 of 3 June 2026 "On the Approval of the Grounds, Principles and Procedure for Applying Price Indexation to Support the Implementation of Infrastructure Projects" (Resolution No. 484, adopted: 05.10.2026, effective: 06.10.2026; applicable: 04.06.2026, and Resolution No. 509, adopted: 26.10.2026, effective: 28.10.2026)

- The amended rules allow contractors to recover price changes in public works contracts procured under the Law of Georgia "On State Procurement". As a general rule, indexation applies to tenders announced from 1 January 2027 (and to tenders in the 2027 procurement plan announced earlier), and only to works performed more than 12 months after the start of works. It does not apply to simplified procurement, to projects financed by international financial institutions

or donors, or to contracts with a performance period of 12 months or less.
- Indexation covers 60 per cent of the value of works performed and is calculated on the basis of the Geostat construction cost index, using as the base the month 28 days before the opening of the tender. The contractor must request indexation before the end of the 12th month of the contract and submit Geostat's conclusions; if the conclusions are not submitted within 15 working days of completion of the works, the procuring entity may call the performance guarantee in full and impose a penalty. Indexation does not entitle the contractor to an additional advance, and the procuring entity may not require an increase in the performance guarantee.
- Under the transitional rule, as extended by Resolution No. 509 to the infrastructure projects of entities within the system of the Ministry of Regional Development and Infrastructure, indexation also applies to works performed since 1 April 2026 under ongoing contracts and to tenders announced between 1 June 2026 and 1 January 2027; for contracts and tenders announced before 1 June 2026, January 2026 is used as the base period. Contractors must apply to the procuring entity by 10 December 2026, failing which the transitional rule does not apply to them.

On amendments to Government Resolution No. 257 of 31 May 2019 "On the Procedure for Issuing Construction Permits for Objects of Special Importance (Including Radiation or Nuclear Objects) and on Permit Conditions" (Resolution No. 477, adopted: 01.10.2026, effective: 02.10.2026)

- Construction works on electricity transmission lines and substations forming part of the transmission network may now be carried out before a construction permit is obtained where there is an emergency, meaning a natural or man-made event or other force majeure that has damaged or is damaging an element of the power system and has caused, or will inevitably cause, its forced disconnection. The client must notify the competent agency in writing immediately when the works begin, and such works are not treated as unauthorized construction.
- Within a reasonable time, but no later than two years after that notification, the client must submit the relevant documentation, including a new type of mandatory expert assessment of the completed structures, and obtain the construction permit, failing which the construction is deemed unauthorized. The permit is issued taking into account the works already carried out.

On amendments to Government Resolution No. 561 of 7 September 2020 on the services, procedure and fees of the LEPL National Agency of State Property in facilitating the disposal of property of interested persons (Resolution No. 495, adopted: 16.10.2026, effective: 19.10.2026)

- As a general rule, the fee for services provided by the National Agency of State Property is paid in advance. For private legal entities, the percentage of the final sale or lease value of the property due under the fee schedule is payable no later than 30 calendar days after the completion of the electronic auction, if a winner is identified.
- An enterprise holding the status of the national oil company under the Law of Georgia "On Oil and Gas", when selling oil and gas produced in Georgia at auction with delivery to buyers in stages, may pay the service fee of 1 per cent of the value of the delivered volumes in instalments, no later than 30 calendar days after each actual delivery.

On the approval of the Technical Regulation on Wheat (Resolution No. 381, adopted: 07.08.2026, effective: 01.11.2026) and on amendments to Government Resolution No. 426 of 31 December 2010 on the issuance of permits by the Revenue Service and the National Food Agency (Resolution No. 474, adopted: 30.09.2026, effective: 01.10.2026)

- From 1 November 2026, wheat and durum wheat intended for human consumption must meet new quality and safety requirements when imported, exported (except in transit and re-export) and placed on the market. These include a maximum moisture content of 14.5 per cent, a maximum ergot content of 0.05 per cent, a maximum of 0.1 per cent of contaminants of animal origin, 1.5 per cent of other organic impurities and 0.05 per cent of inorganic impurities, and the absence of live insects and of toxic weed seeds in quantities posing a health risk. Wheat placed on the market must be labelled with, among other things, the harvest year, the producer, the importer (if any), the weight and the storage conditions.
- Wheat may be imported only from a grain elevator, accompanied by a document from the exporting country's control authority confirming that it was stored in an elevator

before import. Imports through rail and sea checkpoints are allowed only in closed wagons, grain hopper wagons or containers, while imports by road must be accompanied by a conformity document; vehicles must be disinfected before each loading. The regulation does not apply to imports of up to 10 kg with a value not exceeding GEL 500 or to wheat from countries listed in Government Resolution No. 50 of 7 March 2013. The requirements for domestic elevators will apply from 1 January 2031.
- Separately, Resolution No. 474 provides that wheat import permits issued before 22 September 2026 remained valid only until 1 October 2026.

On amendments to Government Resolution No. 385 of 17 December 2010 "On the Approval of the Regulations on the Procedure and Conditions for Issuing Medical Activity Licenses and Inpatient Facility Permits" (Resolution No. 456, adopted: 18.09.2026, effective: 01.11.2026, and Resolution No. 480, adopted: 01.10.2026, effective: 01.10.2026, applicable to the relationships commenced from 01.09.2026)

- From 1 November 2026, all inpatient facilities must ensure, with the patient's informed consent, rapid testing for hepatitis B surface antigen (HBsAg) and reporting for all patients admitted to inpatient care, including emergency and admission units, regardless of the length of stay. Exceptions apply to patients with confirmed chronic hepatitis B and to persons tested in the preceding six months, as confirmed in the unified screening system.
- Under Resolution No. 480, all psychiatric service providers must comply with the additional permit conditions for psychiatric care by 1 January 2027. From that date, every psychiatrist must participate in continuing medical education on the management of psychiatric conditions and collect 20 CME credits annually, and every nurse must complete a course on emergency management, de-escalation techniques and patients' rights once every three years.

On amendments to Government Resolution No. 45 of 26 January 2011 on the terms and fees for services provided by the LEPL National Wine Agency (Resolution No. 472, adopted: 28.09.2026, effective: 01.10.2026)

- The Resolution restates the service terms and fees of the National Wine Agency. A certificate of conformity for exported or imported wine, wine-based beverages, grape-derived spirits and other covered products, and a VI-1 certificate for grape must and grape juice exported to the EU, costs GEL 650 if issued within 1 working day, GEL 525 within 2 working days, GEL 335 within 3 working days and GEL 110 within 4 or more working days; for small wineries, the corresponding fees are GEL 300, 250, 150 and 50.
- A certificate of conformity for wine and covered beverages produced in Georgia for the domestic market is issued within 1 working day for GEL 10 and free of charge for small wineries. Approval of the producer's technological instruction for a grape-derived alcoholic or spirit beverage costs GEL 650 per product.

On amendments to Government Resolution No. 404 of 18 August 2016 "On the Approval of the Procedure for the Legalization of Documents" (Resolution No. 464, adopted: 28.09.2026, effective: 01.10.2026)

- Legalization of documents is carried out in two stages. First, the competent authority certifies the authenticity of the signature, the authority of the signatory and, where applicable, the seal or stamp on the document; then the Consular and Diaspora Department of the Ministry of Foreign Affairs certifies the signature and seal on the first-stage legalization stamp. The competent authority must send the Department a copy of the official's signature on the legalization sticker or stamp, and the Department may rely on these data without additional verification.

On amendments to Government Resolution No. 411 of 9 August 2018 "On the Approval of the List of Agricultural Crops Subject to Mandatory Certification" (Resolution No. 490, adopted: 12.10.2026, effective: 13.10.2026)

- The list of fruit propagating material and fruit plants subject to mandatory certification has been restated and expanded. It now covers, among others, citrus, hazelnut, quince, fig, kumquat, strawberry, walnut, apple, olive, pistachio, almond, apricot, cherry, sour cherry, plum, peach, pear, currant, raspberry and blackberry, blueberry, cherry plum (tkemali) and persimmon. Laurel has been added as a new category of technical crops.

On amendments to the Technical Regulations on the Management of Waste Oils, on amendments to the Technical Regulations on the Managements of Waste Tires, on amendments to the Technical Regulations on the Waste Management of Electrical and

Electronic Equipment (Resolution No. 476, adopted: 01.10.2026, effective: 02.10.2026, and Resolutions No. 492 and No. 493, adopted: 12.10.2026, effective: 13.10.2026)

- The Resolutions revise the annual targets that producers, acting through producer responsibility organizations (PROs), must meet under the extended producer responsibility regime through 2032. The recovery target for tires placed on the market rises from 35 per cent in 2026 to 65 per cent in 2032; the recovery target for waste oils rises from 25 per cent in 2026 to 50 per cent in 2031–2032; and the overall minimum collection target for waste electrical and electronic equipment rises from 25 per cent in 2026 to 65 per cent in 2032, with separate recovery and recycling targets for each equipment category.
- PROs may give priority to waste management measures that rank higher in the waste management hierarchy, provided that the overall recovery or collection targets are met.

On the approval of the Statute of the Dispute Review Service of the Pension Agency (Resolution of the Governing Board No. 13, adopted: 15.10.2026, effective: 16.10.2026)

- The Statute sets out the structure of the Dispute Review Service and the procedure for reviewing employers' complaints and applications. Filing a complaint suspends enforcement of the contested decision from the moment the complaint is registered, but the participant's lost return continues to accrue. For applications and claims, an oral hearing is not mandatory where the case can be examined objectively and fully without one.
- The Statute also sets out the rules for instalment agreements, which will become available from 1 June 2027: on an employer's application, the Service may agree to staged payment of unpaid contributions and the related lost return, only once for the same amount and over no more than 18 months, with a decision within one month; enforcement is suspended while the agreement is in force and resumes immediately if it is breached. The orders update the rules on paying and enforcing pension contributions, including the use of the Revenue Service electronic system for notifications, where the time the addressee views a document is recorded.

On amendments to Order No. 51/ნ of the Director of the LEPL Land Transport Agency of 26 September 2025 "On the Approval of the Procedure for Issuing ECMT Multilateral Permits" (Order No. 64/ნ, adopted: 23.10.2026, effective: 26.10.2026)

- ECMT multilateral permits, which allow international road haulage between member countries, may now be annual or short-term (valid for 30 days) and are issued with the stamp corresponding to the vehicle category ("EURO V safe", "EURO VI safe" or the new "ZEV" category for zero-emission vehicles). Permits without country restrictions are issued only for vehicles of at least the "EURO VI safe" or "ZEV" category.
- To obtain a permit, a carrier must own or lease at least five vehicles registered in Georgia of the "EURO IV safe" category or higher and have adequate financial resources. Employment documents for the transport manager and drivers must show a contract concluded for an indefinite term or at least for the validity of the permit and may not contain any corrections. Carriers must notify the Agency of any change in the submitted information within 15 working days.

On Making an Amendment to Order No. 13017 of the Head of the Revenue Service of 12 June 2023 "On Approving the Form and Procedure for Recording the Movement and Balances of Goods for Certain Categories of Taxpayers and/or Certain Inventory Items", (Order No. 24839; adopted: 30.10.2026; effective: 30.10.2026; applies to transactions carried out from 01.12.2026)

- The Order introduces a new electronic document, the "Act of Purchase of Goods from a Natural Person". Taxpayers must issue it when they buy goods from individuals in the course of their economic activity. The act is issued through the taxpayer's page on www.eservices.rs.ge. It must be issued by the last day of the month following the month of purchase.
- The selling individual confirms the act by one of three methods: an SMS code; an SMS link; through their own rs.ge page. Confirmation must be made within two months following the month of the transaction. The seller's phone number must differ from the buyer's. The purchase acts are automatically recorded in an electronic register that both the buyer and the seller can see.
- The act is not required in the following cases: a) the seller issues a waybill, a special tax invoice for petroleum products or a tax document; b) the purchase is of timber, which is covered by a separate procedure; c) the

purchase is of property subject to ownership registration, such as real estate or vehicles.

- The act is optional for persons under special tax regimes (micro business, small business and fixed tax payers) and for purchases from individuals who are VAT payers.
- The taxpayer is entitled to apply the “Form and Procedure for Recording the Purchase of Goods from a Natural Person,” approved by this Order, also in cases of purchasing services from a natural person.

DRAFT LAWS PENDING BEFORE PARLIAMENT

Draft Law of Georgia "On the State Budget of Georgia for 2027" and the accompanying draft amendments to the Budget Code of Georgia, No. 372/2-XIმპ (submitted by the Government on 30.09.2026; available at: https://parliament.ge/legislation/32448)

- The Government has submitted the draft 2027 State Budget, together with the document "Basic Data and Directions for 2027–2030" and draft amendments to the Budget Code. The draft provides for state budget revenues of GEL 26,795.6 mil of which tax revenues amount to GEL 25,250 mil and expenses of GEL 25,833.2754 mil The overall balance is projected at a deficit of GEL 2,863.289 mil financed mainly through domestic securities (GEL 2,600 mil) and external loans (GEL 2,070.4 mil).
- Under the Budget Code of Georgia, the finance bodies of the autonomous republics and municipalities, and certain legal entities of public law and non-commercial legal entities, may already keep funds in current and deposit accounts in commercial banks and microbanks to earn additional income. The draft proposes to extend this right to state-owned enterprises classified in the general government sector and to the entities referred to in Article 6(b^3) of the Code. These entities could also use the funds in such accounts as security for bank guarantees, loans and letters of credit connected with their economic activity.
- At the same time, state-owned enterprises in the general government sector that have moved to Treasury servicing would need the State Treasury's consent to open any other bank account, as budget organizations already do. The Treasury could revoke the consent and close the account.
- The transitional period for moving municipalities from equalization transfers to the distribution of value added tax (VAT) revenues, which currently ends in 2026, would be extended to 2030, together with the annual cap on the growth of each municipality's forecast VAT revenue. The draft also proposes a new rule for 2027–2030 on redistributing the resources freed up by the cap. They would go first to municipalities whose forecast VAT revenue has fallen compared with the previous year. The remainder would then go to those with the lowest growth, in turn, until the resources are used up. This would replace the current 2025–2026 rule, which is based on a GEL 15 million threshold.
- State-owned enterprises in the general government sector are already due to move to Treasury servicing from 1 January 2027. The draft would exempt enterprises that are inactive or being liquidated, reorganized or privatized, or whose status is being changed or clarified. The Ministry of Finance would keep a register of these enterprises.
- The drafts are currently being reviewed by the parliamentary committees in accordance with the timetable approved by the Bureau of Parliament.

Draft Law of Georgia on making amendments to the Law of Georgia "On Water Users' Organizations" and the accompanying draft amendments to the Law of Georgia "On Fees for the Use of Natural Resources" and the Law of Georgia "On Aquaculture", No. 385/2-XIმპ (submitted by the Government on 28.10.2026; available at: https://parliament.ge/legislation/32536)

- The package proposes to separate the legal regime for "profile" water users, who receive water from the primary water user through the irrigation system for irrigation purposes, from that for "non-profile" users, who use such water for aquaculture, hydropower or technical purposes. Only services to profile users would remain subject to GNERC regulation and tariff setting, while water supply to non-profile users would be removed from that regime. The draft would also create a basis for special rules on supplying water to aquaculture ponds, including water use norms per hectare depending on the supply regime and water surface area.
- Under the proposed amendments to the Law "On Fees for the Use of Natural Resources", where water is supplied through a melioration system, only the primary water user would pay the water use fee, so that the same water is not charged twice. Under the proposed amendments to the Law "On Aquaculture", an applicant for an aquaculture permit that takes water through the irrigation system would have to submit technical conditions issued by the primary water user and a contract concluded with it.

Draft Law of Georgia on making amendments to the Law of Georgia "On the Activities of Commercial Banks" and the accompanying draft amendments to the Law of Georgia "On

the Activities of Microbanks", No. 384/3-XIმპ (initiated by Members of Parliament on 28.10.2026; available at: https://parliament.ge/legislation/32534)

- The package proposes to update licensing, ownership and fit-and-proper requirements for banks and microbanks. Applicants would need supervisory capital meeting NBG requirements instead of a fixed paid-in capital amount, and detailed ownership information would be required only for holders of significant shareholdings, their intermediate owners and beneficial owners. The definition of a "foreign reliable bank", which qualifies for simplified licensing, would be linked to a credit rating from a recognized international rating agency. If an applicant fails to remedy deficiencies within the set deadline, the license would be refused automatically, and the 12-month decision period would run from the NBG's confirmation that the application is complete.
- A significant shareholding would expressly include a holding of exactly 10 per cent, as well as significant influence or control regardless of the size of the holding. Owners would have to notify the NBG in advance of any disposal (not only a sale) that brings their holding below 10, 20, 30 or 50 per cent, and the NBG could suspend voting rights or require a reduction below 10 per cent where a holding was acquired without its consent.
- For systemically important banks, an administrator could hold no more than one executive and two non-executive positions, or five non-executive positions, with positions within one group counted as one, subject to an overall cap of 10 positions, no more than three of them executive. Banks could lease out real estate only for their own banking or related activities, their subsidiaries' activities or their social projects, in addition to managing foreclosed property. For microbanks, the draft proposes a lower minimum share of business loans in the loan portfolio (50 per cent), the removal of the requirement to lend only in national currency and a right to lease out real estate.

Draft Organic Law of Georgia on making amendments to the Organic Law "Election Code of Georgia" and the accompanying draft amendments to the Organic Law "Local Self-Government Code", No. 383/3-XIმპ (submitted by Members of Parliament on 28.10.2026; available at: https://parliament.ge/legislation/32532)

- The package proposes a single deadline for summarizing election results. Currently, the Central Election Commission (CEC) has 26 days to summarize parliamentary and Tbilisi City Council and mayoral elections, while other municipal elections are summarized by district commissions within 15 days. Under the draft, the CEC would summarize the final results of all parliamentary and municipal elections no later than the 15th day after polling day. It would base them on the precinct protocols and on final court decisions on electoral violations.
- District election commissions would be expressly empowered to order recounts on the basis of complaints and to annul results in precincts with gross violations. Their obligation to recount up to five randomly selected precincts would be abolished.
- Observer organizations would be registered by the chairperson of the relevant election commission instead of the commission as a whole.
- Campaign advertising would only have to show the electoral subject's name, number or symbol clearly, instead of meeting the current minimum share of the frame.
- Electoral subjects that pass the threshold would have to file their campaign finance report with the State Audit Office within 5 days of polling day instead of 12.
- The accompanying amendment to the Local Self-Government Code specifies that the first session of the newly elected Tbilisi City Council is opened by the Chairperson of the CEC. The first sessions of other municipal councils continue to be opened by the chairperson of the relevant election commission. Under the current wording, all first sessions are opened by "the chairperson of the relevant election commission".

UPCOMING CHANGES TO THE REGULATORY FRAMEWORK

On making amendments to the Patent Law of Georgia No. 1895-VIმს-XIმპ, the Law of Georgia "On Trademarks" Nos. 1896/1-VIმს-XIმპ and 1896/2-VIმს-XIმპ and the Law of Georgia "On Patent Attorneys of Georgia" No. 1894-VIმს-XIმპ (adopted: 27.10.2026, published: 30.10.2026; substantive provisions effective: 01.01.2027 for trademarks and patent attorneys and 01.02.2027 for patents)

- Parliament has adopted the intellectual property package. From 1 February 2027, any person may request Sakpatenti to carry out a fee-based patent information search: a prior art search (on novelty and inventive step), a search by patent holder or applicant, a freedom-to-operate search for a specific product or process, and a patent family search. Searches may be carried out under a standard or an expedited procedure on the basis of the databases available to Sakpatenti, which is not responsible for the completeness of the results; the results have no legal effect for proceedings under the Patent Law.
- From 1 January 2027, any interested person may request a preliminary search to establish whether a trademark identical to a given sign is protected or applied for in Georgia. Sakpatenti must complete the search within 10 working days of payment of the fee, which must be paid within 15 calendar days of the request. The list of goods, for which registration of the trademark is requested, may be filed in a foreign language as an annex, provided that a Georgian translation is submitted within 15 calendar days of filing.
- For accelerated examination, Sakpatenti will check the application within 3 working days; missing documents must be filed within 15 calendar days, failing which the application is examined under the standard procedure and the accelerated examination fee is refunded.
- Where the earlier trademark has been registered for more than five years, the proprietor of that earlier trademark who challenges a decision of Sakpatenti to register a trademark must, upon the applicant's request, provide evidence to the Appeals Chamber that the earlier trademark was genuinely used in Georgia during the five-year period preceding the filing date or priority date of the contested trademark application in respect of the goods for which it is registered and which are relied upon as the basis of the appeal. If such evidence is not submitted, or if no proper justification for the non-use of the trademark is provided, the appeal proceedings shall be terminated. Where the earlier trademark has been genuinely used only for part of the registered goods, it shall, for the purposes of the appeal proceedings, be deemed to be registered only for those goods in respect of which genuine use has been proven.
- Under Law No. 1896/2-VIმს-XIმპ, effective upon publication on 30.10.2026, owners required to specify the lists of goods of earlier registrations under the 2024 trademark amendments may submit the specification to Sakpatenti within five years of the entry into force of those amendments.
- From 1 January 2027, a patent attorney must hold a higher education degree in natural sciences, mathematics and statistics, ICT, engineering, manufacturing and construction, or health and social welfare.