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Editorial

When it comes to the platforms of political parties, the phenomenon of the filter bubble has taken full control, not leaving aside tax-related topics. While taxes have always been an important tool for politicians to attract potential voters, the feedback, whether in opinion polls or in elections, used to be given for the platform as a whole. It was thus from time to time possible that some aspects of the platform would remain there even though they were not necessarily liked by the party's voters – as long as the politicians were able to come up with a few central ideas that appealed to voters.

This year's elections are different: in effect, parties receive feedback immediately, and for each and every fractional topic. This may distract but sometimes also attract attention. The upcoming elections thus reveal most running parties' and groups' inability to formulate a platform that appeals not just to their traditional voters, but potentially also to the undecided ones. And, what I would mostly expect, a platform that will set the direction in which our tax system should develop over a period exceeding one term of office. Instead, parties concentrate on quick wins aimed at the very centre of their supporter base. Should the feedback be negative, they are ready to revise their ideas within a day. The result is an amazing hodgepodge that the entire electorate will have to deal with for the four upcoming years. What's more, when reading the party platforms, one wonders where all the money needed to fulfil the parties' promises will come from. Or, perhaps, things will turn out differently altogether.

Some parties have already come to realise that they will not be part of the next Czech government, and have instead started to prepare ammunition for the next four years to be spent in opposition. They expect not to find any support for their ideas. Others assume that some of their proposals will fail either when faced with the coalition agreement or during parliamentary voting. All in all, it seems that we are in for a period of partial changes, miniscule concessions and populist attempts to lower VAT on various items. Indeed, we can be sure of only one thing – during the next four years, unlike Estonia, we will be waiting in vain for a modern, simple and fully electronic tax administration system.



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Amendment to VAT Act clarifies VAT ledger statement requirements

The Chamber of Deputies of the Czech Republic passed an amendment to the VAT Act in response to the Constitutional Court's ruling, according to which, within VAT ledger statements, the financial administration may not request from taxpayers data not stipulated, at least in rough terms, by law.



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Section 101d of the VAT Act currently in effect states that in their VAT ledger statements taxpayers must include prescribed data necessary for the administration of VAT. However, the content of these data is not further specified. The Constitutional Court found this to be incorrect and issued a judgment in this respect.

In response to the Constitutional Court's ruling, the chamber of deputies passed an amendment to the VAT Act in its third reading. The amendment changes the section at issue and further clarifies the data that must be included in VAT ledger statements. Since this does not involve any factual modifications of the reported data, taxpayers should not expect any significant changes.

The Constitutional Court set 31 December 2017 as the date by which the law must be changed. If the senate does not approve the proposed changes, the government will probably have to issue a government decree instead.

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A clear path towards interest on retained deductions

The taxpayer's entitlement to interest on long-retained excess deductions has been repeatedly confirmed by the Supreme Administrative Court (SAC), despite the financial administration's displeasure. The General Financial Directorate (GFD) finally had to admit that the SAC's decisions were not isolated. Nevertheless, VAT payers should not expect that interest on retained deductions will ever be paid automatically and on a general basis.



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Current practice has shown that the GFD has set 1 January 2015 as the cut-off date for awarding interest on long-retained deductions. On claims arising before this date, interest of more than 14% p.a. pursuant to SAC case law is awarded to taxpayers, starting from the beginning of the fourth month following the end of the taxable period. But taxpayers must be vigilant and must apply for this interest themselves. The tax authorities will only make their decisions based on justified applications for compensation of difficulties caused to the taxpayer by unreasonably long inspection procedures. The application thus must always be properly substantiated. If the taxpayer does not file the application within six years of the date an excess deduction was refunded, the taxpayer's entitlement to interest will cease to exist. This year, it is thus still possible to claim interest on excess deductions refunded in 2011.

As a result of a special legal regulation effective from 1 January 2015, the interest rate fell dramatically to 1% and the interest-free period over which the tax authority may examine excess deductions was expanded to five months of the date an examination was initiated. From 2015, the low interest rate should also be applied to deductions whose examination was commenced earlier. For example, an excess deduction for September 2013 that was refunded at the beginning of December 2015 will bear interest of 14.05% p.a. for the entire year of 2014 and 1.05% p.a. for 2015. For illustrative purposes, an excess deduction of CZK 1 million would result in interest of CZK 140 thousand for 2014 and less than CZK 10 thousand for 2015. Effective from 1 July 2017, taxpayers should be awarded slightly higher interest (2% + repo rate) for the period exceeding four months of the deadline for filing a tax return.

The above point-in-time application of various interest rates has been the subject of a large number of counterarguments, supporting the application of the higher interest rate also on excess deductions retained in 2015 and in subsequent years. However, significantly higher interest on retained deductions after 2014 would most likely have to be claimed in court.

Taxpayers themselves must try to remember periods for which their excess deductions were retained and their entitlement to interest arose and, subsequently, file the appropriate application with the tax authority. Where such an application has previously been dismissed by the tax administrator, the taxpayer may file it again. In practice, it is quite common that interest is awarded to the taxpayer even if only part of the excess deduction was refunded to the taxpayer after the examination. We recommend reviewing the tax administrator's examinations of excess deductions over the last few years. It is also worth considering claiming more than one or two percent from the tax administrator, as these do not equal the cost of money retained by the tax administrators over the time of the

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examination.

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Taxation of disproportionate profit share distributions

The Coordination Committee of the General Financial Directorate and the Chamber of Tax Advisors recently dealt with the taxation of profit distribution under the Corporations Act in situations where members of a limited liability company or shareholders of a joint-stock company receive shares in profit disproportionate to their shares in the registered capital.



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The Corporations Act allows for flexibility in determining the amount of profit shares. Usually, members of limited liability companies receive profit shares equalling their shares in the registered capital, unless the memorandum of association provides otherwise. The same applies to shareholders of joint-stock companies, who are generally entitled to profit shares proportionate to their shares in the registered capital, unless the articles of association provide otherwise for a specific class of shares.

The Coordination Committee's discussion aimed to clarify whether the payment of a share in profit disproportionate to the share in the registered capital between Czech tax residents is subject to a regular tax regime, i.e. a 15% withholding tax with potential exemption from tax upon the payment of profit shares to the parent company. The Committee also had to decide whether such a share in profit may lead to the generation of other taxable income by the entity receiving the profit share.

The discussion paper dealt with various alternatives of disproportionate profit share distributions, one of which was the payment of profit shares specified by the memorandum of association as fixed amounts different from the relevant shares in the registered capital. Another alternative involved the annual change of the articles of association of a joint-stock company when each shareholder is annually paid a different profit share amount while maintaining the same shareholders' structure. The last alternative was the possibility to determine a profit share depending on the amount of profit for distribution (e.g. profit of up to CZK 10 million is distributed among members proportionately to their shares in the registered capital and profit exceeding this amount is distributed in another proportion). All the above changes in the allocation of profit shares must have good economic reasons and may not be aimed at generating income tax savings or gaining other tax advantages.

The discussion paper submitters and the GFD arrived at the same conclusion: the distribution of a share in profit disproportionate to the relevant share in the registered capital of a corporation performed in compliance with the Corporations Act is subject to the standard tax regime, i.e. a 15% withholding tax. The exemption of profit share distribution paid out to the parent company may also be applied. In addition, the Coordination Committee confirmed that members or shareholders who receive shares in profit higher than their respective shares in the registered capital do not generate other taxable income.

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LES unconstitutional

In the last issue of Tax and Legal Update, we briefly informed on the proposed amendment to the Act on the Czech Chamber of Commerce introducing the Legal Electronic System – LES. Today, we will look into some of the system's deficiencies.



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The bill has passed through the Chamber of Deputies as Print No. 1089 and is now to be discussed in the Senate of the Czech Republic. Although the government had taken a neutral standpoint towards the bill in May, it had voiced some strong reservations that were expected to be dealt with during the bill's discussion in the chamber – yet, in vain.

The essence of the new regulation consists in the creation of an electronic system concentrating the duties of entrepreneurs in one place and arranging them in a clear and transparent manner. Although such an intention is surely commendable, the proposed manner of its implementation has several serious issues.

In its reservations, the government particularly pointed out the bill's noncompliance with the constitution: for instance, in the government's opinion, it breaches the equality principle as it gives undue preference to entrepreneurs over individuals not carrying out business; it also breaches the segregation of powers principle and infringes on the law-making authorities of the Senate, the government and local self-governments. The government also points out the absence of information on duties ensuing directly from applicable EU legislation and international law. The amendment is further criticised for many other, albeit rather formal, deficiencies.

Thus, together with the original bill, the Senate will receive a letter signed by lawyers and legislators, following along the lines of the government's standpoint and pointing out the problematic issues. We will have to wait and see how the senators will deal with them.

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Government outlines new possibilities of regulating sharing economy

The Office of the Government published its analysis of possible ways to regulate the sharing economy and digital platforms. It primarily targets the most widespread accommodation and transport services.



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The sharing economy, or collaborative consumption, is not a new trend – yet, its significance has been growing rapidly. In the Czech Republic, particularly in Prague, shared accommodation (such as Airbnb) and transportation (for instance Uber) are most widespread. According to the governmental analysis, these services are quickly catching up with the traditionally provided ones: in transportation, they currently involve one fifth to one fourth of drivers; in accommodation, they account for up to one half of the total number of beds.

While these services bring undisputable benefits to consumers, they mostly fall under the grey economy – their providers often do not report income from these activities and subsequently do not pay tax or applicable local fees. According to the government's analysis, at least 80% of these services approximate a regular business activity, going far beyond the original concept of sharing idle property (albeit for consideration).

Clearly, none of the solutions that come to mind is perfect and can satisfy all parties involved. It is to be noted that Uber, in particular, is facing numerous litigations and complaints, both in the Czech Republic and abroad. There is, for instance, the court-issued preliminary ruling/injunction prohibiting Uber from operating or mediating its services in the territory of the City of Brno. Recently, an opinion of the CJEU Advocate General rejected the assertion of Uber's Barcelona branch that it is an information service, therefore only subject to limited regulation. Instead, the Advocate General pronounced it a transportation service that as such has to comply with applicable regulatory requirements.

The recommendations of the analysis mention the possibility of a comprehensive regulation of earnings generated from the sharing economy: a limit should be set (on a turnover or time basis) making it possible to clearly distinguish between "extra earnings" and a business activity. Learning from examples abroad (for instance from Finland, Estonia or Lithuania), the tax administrator's lack of information should be eliminated by using data recorded by intermediaries on payments between the service providers and users. The published document is not to be considered the official standpoint of the government but rather a basis for a factual debate on the adoption of concrete regulations for the sharing economy.

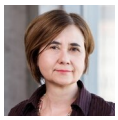
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EU finance ministers discuss new digital economy rules

An informal meeting of the EU's finance ministers and central bank governors took place in Tallinn in September and addressed, among other things, taxation issues in the context of the digital economy. The ministers looked into new approaches to the taxation of income of businesses operating in the digital economy sector. They also focused on improving existing international taxation principles. The aim of the meeting was to respond to new business models, the growing internationalisation of business activities and the digitalisation of economy.



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The European Commission outlined the issues that governments face regarding the taxation of the digital economy. The current rules of international taxation require a business' physical presence in another state. In today's globalised and digitalised world, where goods and services can be delivered with minimal physical presence in another state, it is very hard to apply these rules. Businesses may thus avoid taxation both in the country of their residence and in the country of the source. The Commission thus wants to focus on the nexus, i.e. on determining which state has taxing rights over services that are provided digitally (although a commercial presence is only virtual), and on value creation, i.e. on allocating profits to such a virtual presence.

The finance ministers agreed on a two-phase approach. For the short term, the following three options were proposed:

- an equalisation tax on turnover; this would take the form of a tax on any untaxed or insufficiently taxed income from digital business activities, either creditable against a company's corporate income tax liability in the country of residence or introduced as a separate tax in the country of source;
- a withholding tax on digital transactions, levied on a gross value of certain payments to non-resident providers of goods and services online;
- a levy on revenues generated from the provision of digital services or advertising activity, applicable on all transactions carried out remotely with local customers.

At the Tallinn meeting, Austria, Bulgaria, France, Germany, Greece, Italy, Portugal, Romania, Slovenia, Spain, Belgium and the Netherlands supported the above solutions.

For the long-term, however, the Commission recommends updating and revising the existing international tax rules. This involves primarily amending the definition of a permanent establishment to allow for the attribution of

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profits from digitalised services and goods; developing alternative approaches to traditional transfer pricing methods together with specific anti-abuse rules; and amending the CCCTB (Common Consolidated Corporate Tax Base) proposal to capture digital activities.

The participants also voiced the opinion that passing the proposed improvements to the existing international tax rules promptly would leave no need to implement the above temporary short-term measures.

One week after the informal ECOFIN meeting, Tallinn hosted a digital summit where the Commission submitted its assessment of each of the above solutions in terms of double tax treaties, state aid rules, fundamental freedoms and international treaties. The aim was to achieve consensus on the best way forward during the Council of the EU meeting in December, followed by a legislative proposal from the Commission by spring 2018.

It is to be expected that these initiatives will be further coordinated within the OECD's BEPS Action 1 framework – Addressing the Tax Challenges of the Digital Economy. The OECD, however, plans to present its interim report on the taxation of the digital economy only at the G20 Finance Ministers' session in April 2018, while its final report containing policy options and recommendations is expected in 2020.

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Monitoring employees' emails

The case involving a 38-year old engineer from Bucharest continues: the dispute between a Romanian employee who despite a ban used his employer's equipment for private purposes during his working hours and a private company that monitored his communication has taken an opposite turn. In January 2016, the chamber of the seven judges of the European Court for Human Rights (ECHR) sided with the employer, concluding that monitoring the employee had been justified and reasonable under the circumstances. In September 2017, however, the grand chamber of the court quashed the judgment. What effect will this have on Czech employers and employees?



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In 2007, a private Romanian company fired its employee who was supposed to communicate through Yahoo Messenger with customers, yet used this application also for personal communication with his brother and fiancée. After being fired, the employee sought the invalidity of the termination notice before Romanian courts, claiming that the employer violated his right to respect for private life as protected by the European Convention on Human Rights.

In January 2016, the ECHR chamber sided with the employer. However, on 5 September 2017, the court's grand chamber ruled to the contrary, claiming that the Romanian courts had failed to strike a fair balance between the interests of the parties involved, and that the employee's right to respect for private life had been violated.

The grand chamber in particular pointed to the Romanian courts' failure to determine whether the employee had received prior notice of the possibility that his communication might be monitored, or whether the communication could have been accessed without the employee's knowledge. Furthermore, the courts had not questioned whether the employee had been informed of the nature and extent of the monitoring, and how far his private life had been intruded upon. The national courts had also failed to determine the specific reasons used to justify the introduction of the monitoring measures and whether the employer could have used measures entailing less intrusion upon the employee's privacy while meeting the same purpose.

Czech regulations concerning intrusions into employees' privacy by employers are stricter than the Romanian ones; hence, the decision has no real effect on Czech employers. It remains true that a violation of employees' privacy at the workplace and at the employer's premises is only admissible for significant reasons. For example, the specific nature of an employer's activity may justify the implementation of adequate monitoring. The protection of employee privacy is not unlimited, but statutory limits have to be observed. The employer is explicitly obliged to inform the employee of the extent and manner of monitoring, and must make sure that such an intrusion into privacy is proportionate. It is to be expected that with the increase in electronic communication tools the importance of this issue in labour-law relations will grow.

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Privacy for thieves

The Constitutional Court finally closed a lengthy dispute over the legality of publishing a thief's photograph on a social network by the victim of the theft. However, the court did not deal with the details of the case, stating only that the previous decisions had complied with the law and had not shown any deficiencies. The Constitutional Court thus confirmed the opinion formulated by the Supreme Administrative Court (SAC), which concluded that publishing a photograph obtained from a camera system was illegal and violated the thief's right to personal data protection. How shall we then proceed to protect our property effectively?



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The case in question involved the theft of an electric bicycle from a shop. The shop owner had a camera recording of the thief and published the photograph of his face the next day. Although this helped to apprehend the offender, the company was fined CZK 5 000 by the Office for Personal Data Protection.

In certain situations, the Personal Data Protection Act allows the processing of personal data even without the prior consent of the affected person. Such situations undoubtedly also include the protection of property. The personal data processor, however, may only resort to this exception if two preconditions are met: first, the data processing must be necessary to protect the property; second, the right to the protection of property must not be outweighed by the captured person's right to the protection of their private and personal life. Both rights thus have to be measured against each other, and the right to the protection of property must prevail.

According to SAC, installing and using a camera system in publicly accessible areas and subsequently handing the recordings over to the police do meet the above conditions. The police then have the legal authority to publish the recordings. In contrast, should the victim publish the photograph or video, the precondition of necessity will not have been met. While the very purpose of the records is to help identify and capture the offender, the decision on their publishing has to be made by the relevant public authorities.

According to the court, in cases like this one, the injured party can do nothing but hand the camera recordings over to the relevant police body, and rely on them doing their job. However, considering the police success rate in investigating stolen items, the ruling is not at all helpful in the protection of one's property.

The Constitutional Court's decision has thus been subject to considerable criticism, even by lawyers, as it seems unjust that in the above proportionality test, weighing the infringement of the offender's personal rights against the injured party's rights to the protection of ownership, the interest of a criminal offender should prevail – at least under the circumstances.

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Independent groups of persons and the financial sector

The end of September brought two ground-breaking rulings issued by the Court of Justice of the European Union (CJEU) that will significantly affect not only the financial sector. The CJEU judges finally provided their long-awaited answer to the question of whether independent groups of persons may also operate in the banking and insurance sectors, an issue on which both the professional public and the advocates general could not reach agreement.



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The CJEU had to deal with a number of cases regarding VAT exemptions for independent groups of persons. The court's rulings were expected to positively affect the utilisation of such groups in the Czech financial market. This potential, however, has remained unfulfilled, as in its rulings in cases C-605/15 Aviva and C-326/15 DNB Bank, the court surprisingly held that the VAT exemptions may not be applied to the financial and insurance sectors. The CJEU thus diverted from its implicit conclusions on the C-8/01 Taksatorringen case from 2003, dealing with associations of small and medium-size insurance companies. At that time, while the court held that a particular exemption of an independent group of persons must not threaten competition, it did not reject its existence in the insurance sector.

In its reasoning, the CJEU mainly focused on the classification of independent groups of persons within the VAT Directive system, emphasising that all exemptions represent exceptions from a general rule and that their interpretation should be as narrow as possible. The CJEU concluded that independent groups of persons may only function in relation to services that are exempt in the public interest (pursuant to Article 132 of the VAT Directive). This usually involves sectors such as healthcare and education.

The judges were probably aware of the importance of their rulings in some countries and, consequently, added to the final parts of their rulings that it was not possible to challenge periods already closed. They also held that the financial administrations may not rely on the direct effects of the directive against taxpayers. However, the Czech financial market need not worry about this as it commonly uses VAT groups rather than independent groups of persons.

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CJEU again on conditions of exempt intra-community supplies of goods

In its ruling regarding intra-community supplies of goods, the Court of Justice of the European Union (CJEU) again confirmed the widely discussed possibility to attribute transport just to one supply within a chain of supplies. The ruling also brings an interesting view on the processing of goods during delivery and on the acquisition of ownership title in connection with VAT-exempt supplies of goods.



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In the case in question (C-386/16), a Lithuanian VAT payer imported frozen fish from Kazakhstan and subsequently supplied the fish to a customer identified for VAT in Estonia who informed the Lithuanian supplier beforehand that the fish would be supplied to customers in other member states within thirty days of its acquisition. The supplier thus first delivered the goods to a processing plant in Lithuania from which – after sorting, glazing and packaging – the customer identified for VAT in Estonia supplied the goods to customers in other EU member states directly from Lithuania.

Both parts of the transaction – from the supplier to the customer and from the customer to end customers – were reported as exempt intra-community supplies. However, the Lithuanian tax administrator argued that the first part of the transaction only involved a local supply since the goods were only transported for processing in the territory of Lithuania. Two requests for a preliminary ruling were therefore filed with the CJEU.

The first question was whether the supply of goods by the supplier was exempt from VAT if, before the supply itself, the customer had expressed their intent to resell the goods to other member states. The second question was whether the processing of the goods on the customer's behest prior to their being transported to other member states had any effect on the exemption of the supply from VAT.

Pursuant to CJEU case law, three conditions must cumulatively be met to claim entitlement to an intra-community supply exemption: goods must be delivered to an entity registered for VAT in another member state; goods must be dispatched or transported to another member state; and the transport must be ensured by the payer or the acquirer or a third person authorised by the payer or the acquirer. Simultaneously, where individual supplies follow one another forming a chain, the intra-community transport must only be attributed to one of the two supplies, which then will be exempt from VAT.

In the case in question, the first transaction actually involved a supplier effecting a local supply of goods to a processing plant, which means that the supply was not exempt from VAT, irrespective of where (in what member state) the contracting parties were registered for VAT. The CJEU also confirmed that during the second transaction the customer did not acquire the right to dispose of the goods as their owner since the goods were directly dispatched from the processing plant in Lithuania to end customers in other member states.

The CJEU concluded that if the customer seated in another member state informs the supplier that the goods will be immediately resold and dispatched directly to another member state before leaving the supplier's member

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state, the supply effected by the supplier cannot be exempt from VAT. Any processing of the goods based on the customer's order before delivery to end customers does not have any effect on this conclusion.

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Case law

“Perfect” documentation does not automatically guarantee deductibility for tax purposes

In its recent judgment (file no. 7 Afs 330/2016), the Supreme Administrative Court (SAC) again held that even an accounting document free of any formal deficiencies and containing all essential elements does not prove on its own that the declared taxable supply has really been effected. The taxable supply’s performance and extent must be proven conclusively by other means of evidence.



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In the case in question, the taxpayer claimed invoices for cleaning services and advertising and promotion expenses as deductible expenses. The tax administrator expressed doubt about the tax documents. In response, the taxpayer provided further evidence that the services at issue had really been provided. After taking into account uncertain witness statements and partially missing contractual documentation and after carrying out a detailed analysis of the photo documentation relating to the advertising services revealing a number of deficiencies, the tax administrator decided not to treat the reported expenses as deductible.

The taxpayer first tried to reverse the tax administrator’s decision via an action filed with the Municipal Court in Prague and, after its dismissal, via a cassation complaint. However, the SAC confirmed the tax administrator’s original decision, agreeing that the existence of accounting documents, i.e. receipts and invoices, does not on its own prove that the declared deliveries were really performed. To claim expenses as tax deductible, taxpayers must usually also produce other means of evidence to prove that deliveries stated in the invoices were really carried out.

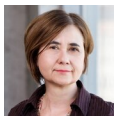
The SAC confirmed that there is no legal regulation specifying how many means of evidence the taxpayer must provide for each individual transaction, i.e. deductible expense item. Logically, though, taxpayers must make sure that they are able to prove individual transactions in a trustworthy manner, especially where significant amounts are concerned. In addition to accounting and contractual documentation, they should collect other means of evidence confirming the actual receipt or performance of taxable supplies, and keep them over the period over which tax can be assessed or additionally assessed.

The SAC’s decision shows a trend that has become obvious over the last few months. Both the SAC and the tax administrators tend to apply a relatively strict approach to assessing whether advertising services (and not only those) were really provided. We therefore recommend paying increased attention to collecting supporting evidence on significant amounts, not only with respect to marketing services.

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Latest news - October 2017

Last month's tax and legal news in a few sentences.



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- The government approved a bill designed to detach consumer protection regulations from the Civil Code to harmonise the regulations with EU law and strengthen the position of customers. However, the question remains what position the new government and the chamber of deputies will hold in respect of this issue after the October elections.

- To enhance the awareness and legal certainty of persons subject to corporate and personal income tax when claiming indirect research and development support, the GFD issued its information about pre-conditions for claiming deduction for research and development projects pursuant to Section 34 (4) and (5) of the Income Tax Act.

- The government approved a memorandum on the automotive industry's future in the CR. Its action plan contains twenty-five tasks to support electro-mobility, digitisation and autonomous driving up to 2025.

- In its recent decision, the Supreme Administrative Court confirmed its opinion on the practical interpretation and application of Section 24 (2)(zc) of the Income Tax Act as amended until the end of 2014.

- An amendment to the Act on International Cooperation in Tax Administration, significantly strengthening information exchange mechanisms and enhancing tax administration transparency, was published on 19 September 2017 in the Collection of Laws and has been in effect since then, along with a decree containing a country-by-country report template and instructions on its completion (no. 305 and 306/2017 Coll.).

- An amendment to the Act on Sickness Insurance introducing a new long-term care allowance was published in the Collection of Laws under no. 310/2017. With effect from 1 June 2017, the new allowance will be provided to persons participating in the sickness insurance scheme, i.e. employees or self-employed persons, who cannot carry out their gainful activity as they care for a person in need of such care in their home.

- Newly-published Act No. 303/2017 Coll. repeals the publicly beneficial status in the Civil Code and other regulations. Non-profit organisations were supposed to apply for this status in accordance with the original substance of the law.

- Government Decree No. 286/2017 Coll. increases the minimum wage to CZK 12 200 effective from 1 January 2018.

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