

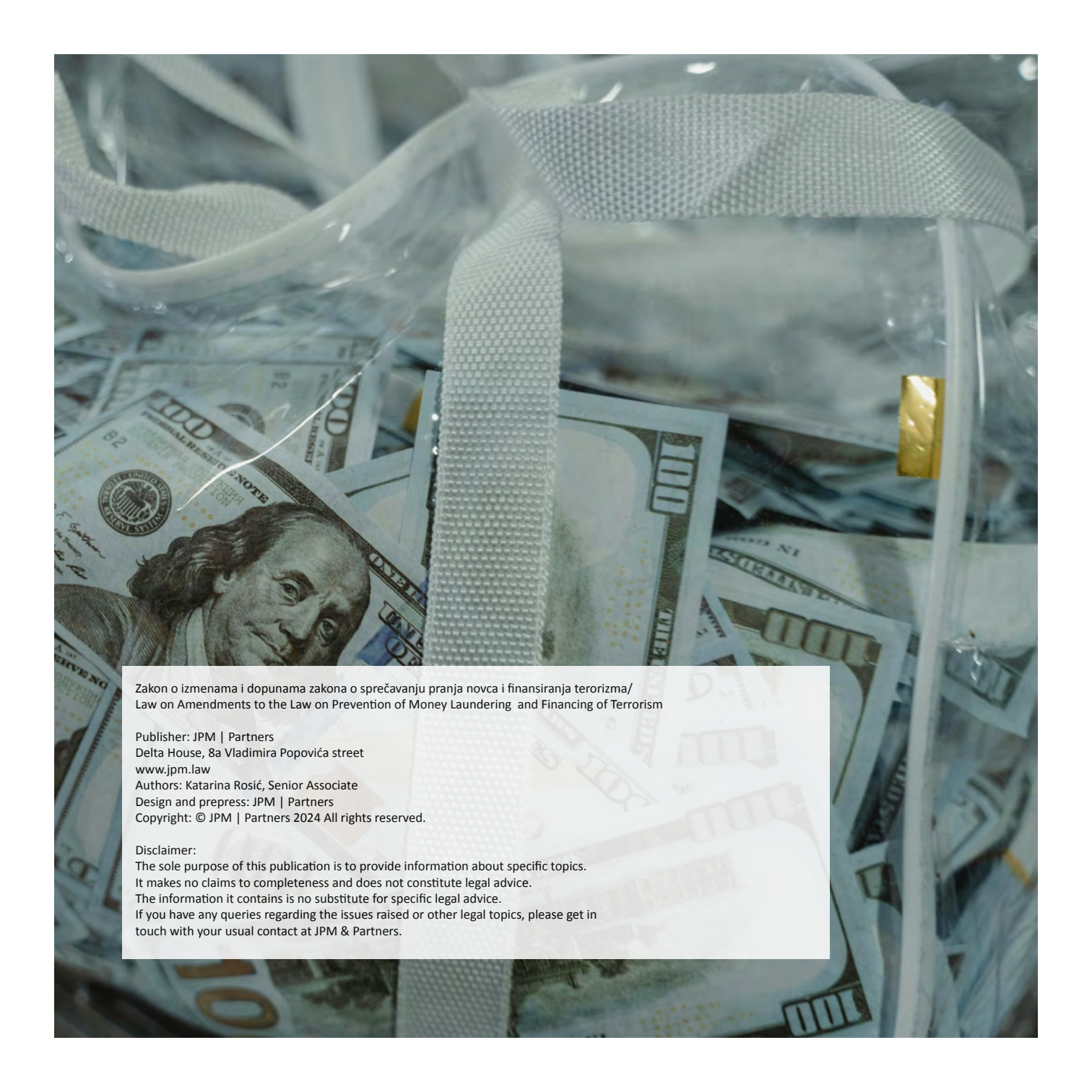


**Zakon o izmenama i dopunama zakona o sprečavanju pranja novca  
i finansiranja terorizma**

**Law on Amendments to the Law on Prevention of Money Laundering  
and Financing of Terrorism**

**JPM**

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Law on Amendments to the Law on Prevention of Money Laundering and Financing of Terrorism

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6. decembra 2024. godine na snagu stupaju Zakon o izmenama i dopunama zakona o sprečavanju pranja novca i finansiranja terorizma, kao i Zakon o dopuni zakona o javnom beležništvu. Ova dva zakona usvojena su u Skupštini Republike Srbije i objavljena u Službenom glasniku Republike Srbije 28. novembra 2024. godine.

Od sutra će biti obavezna overa (solemnizacija) ugovora o zajmu između fizičkih lica u iznosu od 10.000 evra i više po srednjem kursu NBS na dan solemnizacije ugovora. Pored toga, javni beležnici će imati obavezu da takve ugovore dostave Upravi za sprečavanje pranja novca.

On 6 December 2024, the Law on Amendments to the Law on Prevention of Money Laundering and Financing of Terrorism and the Law on Amendments to the Law on Public Notaries enter into force. These two laws were adopted by the National Assembly of the Republic of Serbia and published in the Official Gazette of the Republic of Serbia on 28 November 2024.

Starting tomorrow, solemnization of loan agreements between natural persons in the amount of EUR 10,000 and higher, calculated in accordance with the middle exchange rate of the National Bank of Serbia (NBS) on the date of the solemnization, will be mandatory. In addition, public notaries will be obliged to submit such agreements to the Administration for the Prevention of Money Laundering.

U septembru 2024. godine Vlada Republike Srbije je usvojila novu odluku – Odluku o upravljanju i načinu upotrebe portala „eKonsultacije“ kojom su unete određene promene u odnosu na inicijalno ustanovljen sistem, pre svega kroz nešto drugačiju raspodelu nadležnosti za upravljanje i vođenje stručnih poslova vezanih za portal, ali bez uticaja na samu suštinu i smisao portala „eKonsultacije“ – da isti predstavlja jedinstveno elektronsko mesto za sprovođenje konsultacija i javnih rasprava u procesu pripreme i donošenja propisa (i, u skladu sa tekstom nove Odluke Vlade, planskih dokumenata).

In September 2024 the Government of the Republic of Serbia adopted a new decision – the Decision on managing and manner of use of platform „eConsultations“ which brought certain changes in comparison to initially established system, mainly in terms of somewhere different distribution of competencies for managing and conducting of expert tasks related to the platform, but without affecting the substance and purpose of the platform “eConsultations” – which is that this is a unique electronic platform for conducting of consultations and public hearings in the process of preparation and adoption of regulations (and, pursuant to the wording of the new decision of the Government, planning documents).

Pre mesec dana, naš partner, Jelena Stanković Lukić, detaljno je analizirala predlog izmena Zakona o javnom beležništvu. Više detalja možete pronaći na [sledećem linku](#).

Zakonom o izmenama i dopunama zakona o sprečavanju pranja novca i finansiranja terorizma propisano je da lice koje se bavi prodajom robe i nepokretnosti ili pružanjem usluga u Republici Srbiji ne sme da primi gotov novac kao naknadu za prodatu robu, odnosno pružene usluge, u iznosu od 10.000 evra ili više u dinarskoj protivvrednosti, bez obzira na to da li se radi o jednoj ili više povezanih gotovinskih transakcija ili jednom ili više ugovora u periodu od godinu dana. Ovaj novčani iznos mora biti uplaćen na račun otvoren kod banke. Ovo ograničenje se odnosi i na fizička lica koja primaju gotov novac na osnovu ugovora o zajmu ili ugovora o kupoprodaji nepokretnosti.

A month ago, our partner Jelena Stanković Lukić provided a detailed analysis of the proposed amendments to the Law on Public Notaries. For more details, please visit the [following link](#).

The Law on Amendments to the Law on the Prevention of Money Laundering and Financing of Terrorism stipulates that anyone engaged in the sale of goods, real estate, or the provision of services in the Republic of Serbia is prohibited from accepting cash payments of EUR 10,000 or higher (in RSD equivalent) for goods or services. This applies whether the payment is made in a single transaction or in multiple related cash transactions, or in the case of one or more agreements within one year. Such payments must be deposited into a bank account. This restriction also applies to natural persons receiving cash under loan agreements or agreements for the sale of real estate.

Razlog ovih izmena zakona o sprečavanju pranja novca i finansiranja terorizma jesu preporuke nastale kao rezultat rada Stručnog tima Koordinacionog tela za sprečavanje pranja novca i finansiranje terorizma, u vezi sa procenom rizika u sektoru nekretnina.

Cilj ovih izmena jeste ublažavanje rizika u ovom sektoru, ograničavanjem transakcija kupovine i plaćanja u gotovom novcu za fizička lica. Takođe, ovim putem se ublažavaju i rizici u pogledu izvršenja krivičnog dela zelenaštva, te se zabranjuje primanje gotovog novca „na ruke“ u iznosu od 10.000 evra ili više, po osnovu ugovora o zajmu.

The reason behind these amendments to the law on preventing money laundering and financing of terrorism are the recommendations resulting from the work of the Expert Team of the Coordination Body for Preventing Money Laundering and Financing of Terrorism, regarding the risk assessment in the real estate sector.

The aim of these amendments is to mitigate risks in this sector by limiting transactions involving the purchase and payment in cash for natural persons. Additionally, these amendments address the risks related to usury crimes, prohibiting the receipt of cash in amounts of EUR 10,000 or higher, based on loan agreements.



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