

# The new Fiscal Code and other fiscal-budgetary measures, 2024



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## Amendments in brief:

**Law No. 296/2023** regarding certain fiscal-budgetary measures for ensuring the long-term financial sustainability of Romania was published on October 27, 2023, in the Official Gazette No.977. The law encompasses the following key amendments and measures:

- It amends and supplements the Tax Code.
- It introduces measures to strengthen financial and fiscal discipline.
- It implements additional measures concerning the national electronic invoice system, RO e-Invoice (GEO 120/2021).
- It contributes to increasing voluntary compliance in the case of road transport of goods (by introducing the RO e-Seal system).

## Amendments in detail:

### Key-words:

- A turnover of 50,000,000 euros
- Minimum Tax on Turnover (MTT)
- Calculation method for MTT
- Assets to be taken into account – eligible assets

All changes and additions to the Tax Code will come into effect on January 1, 2024, with the exceptions expressly mentioned below.

### (1) Title II, Corporate income tax

#### A. A Minimum Turnover Tax (MTT) of 1% is introduced.

- ❖ **Who is liable?** - Taxpayers with a "turnover" exceeding 50,000,000 euros in the previous year of the reference year, but who, in the current fiscal year, have a cumulative corporate income tax lower than the MTT.
- ❖ Both the calculation base for MTT and the corporate income tax for the current year for comparison, with a specific formula for calculation.
- ❖ **Who is exempt?** - (i) Credit institutions and (ii) legal entities engaged in the oil and gas sector - for both categories, new special tax rules have been introduced.
- ❖ **How is it declared and calculated?** - Quarterly, cumulatively from the beginning of the fiscal year/amended fiscal year until the end of the quarter/the reference year, according to the following formula:

$$IMCA = 1\% \times (VT - Vs - I - A), \text{ where:}$$

- VT – total revenues, meaning the total amount of revenues obtained by the taxpayer during the respective period, starting from the beginning of the fiscal year or modified fiscal year up to the end of the quarter or calculation year, as the case may be.
- Vs – revenues deducted from total revenues (non-taxable revenues, revenues related to the cost of inventories of products, revenues from services in progress, revenues from the production of tangible and intangible assets that are not included in indicator I, revenues from subsidies, revenues from compensation, revenues representing excise duties that have been simultaneously reflected in the expense account)
- I – the value of assets under construction resulting from the acquisition/production of assets, recorded in the accounting records starting from January 1, 2024/the first day of the modified fiscal year beginning in 2024
- A – accounting depreciation at historical cost related to assets acquired/produced starting from January 1, 2024/the first day of the modified fiscal year beginning in 2024. This indicator does not include the accounting depreciation of assets included in the value of indicator I
- ❖ **The assets considered for these indicators (I and A) are determined by an order issued by the Minister of Finance, which will be issued within 60 days of the entry into force of Law 296/2023; the category of**

- Tax credit for sponsorships
- External tax credit
- Exempted profit tax
- Consolidated fiscal group
- January 1, 2024

**eligible assets is established based on criteria related to the nature of the activities that are carried out.**

- ❖ To compare the corporate income tax with the MTT, only the following deductions are made from the corporate income tax basis:
  - amounts representing sponsorship/patronage;
  - other amounts that are deducted according to special laws;
  - the reduction of corporate income tax according to Emergency Ordinance 153/2020;
  - **Amounts representing: foreign tax credit, exempt corporate income tax, or any other amounts included, otherwise, in the calculation of corporate income tax are not deducted.**
- ❖ **Impact on fiscal groups (tax consolidation):**
  - each member calculates MTT and communicates it to the responsible legal entity (group leader)
  - The responsible legal entity compares the corporate income tax determined at the fiscal group level with the total value of MTT received from the members of the fiscal group. If the group's fiscal result is a loss, the group's tax is owed at the level of the total MTT

#### **B. An additional tax of 2% or 1% is introduced for credit institutions**

- Credit institutions
- Branches of credit institutions
- Additional turnover tax
- 2% for January 1, 2024 – December 31, 2025
- 1% starting with January 1, 2026
- 25 of the month following the quarter

- ❖ **Who is liable?** - (i) Credit institutions, legal entities in Romania, and (ii) branches in Romania of credit institutions, legal entities based abroad.
- ❖ **What is the applicable rate?** - **2% for the period from January 1, 2024, to December 31, 2025, inclusively**, and **1%** starting from **January 1, 2026**.
- ❖ **This tax is owed in addition to the corporate income tax.**
- ❖ **How is it declared and calculated?** - Quarterly, by the 25th day of the following month of the quarter for which payment is made, for quarters I–III, and by March 25th of the following year for quarter IV.
- ❖ It is calculated as the difference between the MTT determined cumulatively from the beginning of the fiscal year and the MTT owed for the period prior to the calculation period (a calculation mechanism similar to the quarterly corporate income tax).
- ❖ For calculation purposes, the turnover includes the following elements:
  - Interest income;
  - Dividend income;
  - Fees and commissions income;
  - Gains (losses) from the recognition of financial assets and liabilities not measured at fair value through profit or loss, net;
  - Gains or losses related to financial assets and liabilities held for trading purposes, net;

- Non-deductible expense

- Gains or losses related to non-trading financial assets, mandatory measured at fair value through profit or loss, net;
- Gains or losses related to financial assets and liabilities designated as measured at fair value through profit or loss, net;
- Gains or losses from hedge accounting, net;
- Exchange rate differences (gain or loss), net;
- Gains or losses from the derecognition of non-financial assets, net;
- Other operating income.

- ❖ For the determination of the fiscal result, MTT is a non-deductible expense.
- ❖ The model and content of the supplementary tax declaration are established by order of the President of the National Agency for Fiscal Administration (ANAF) within 60 days of the entry into force of Law 296/2023.

**C. An additional tax of 0.5% is introduced for legal entities engaged in the oil and gas sectors (ICAS).**

- Activities in the oil and gas sectors

- Additional tax of 0.5%

- Turnover of 50,000,000 euros

- Quarterly calculation

- until the 25th of the month following the quarter for which the payment is due

- January 1, 2024

- 1%, <60.000 euro

- ❖ **Who is liable?** - Legal entities that (i) engage in activities in the oil and natural gas sectors and (ii) have a turnover exceeding 50,000,000 euros in the year preceding the reference year.
- ❖ **Who is exempt?** - Economic operators that (i) **exclusively** engage in the distribution/supply/transport of electricity and natural gas and are regulated/licensed by the National Energy Regulatory Authority.
- ❖ This ICAS is an additional tax on corporate income tax.
- ❖ It is calculated using a specific formula, namely:  
$$\text{ICAS} = 0,5\% \times (\text{VT} - \text{Vs} - 1 - \text{A})$$
- ❖ **How is it declared and calculated?** - Quarterly, by the 25th day of the following month of the quarter for which payment is made, for quarters I–III, and by the deadline for the annual corporate income tax, for quarter IV.
- ❖ ICAS is a non-deductible expense for the calculation of corporate income tax.
- ❖ The model and content of the declaration for the specific tax on turnover are established by order of the President of ANAF.

**(2) Title III – Tax on Microenterprise Revenues**

- ❖ The tax rates for microenterprises will change from January 1, 2024, and will be:
  - **1%**, if the revenues do not exceed 60,000 euros, and microenterprises do not engage in the activities mentioned below.
  - **3%**, if, during the fiscal year, the revenues exceed 60,000 euros or if the microenterprise starts engaging in specific activities such as:

- 3%, >60.000 euro

- Specific activities

- March 31

- Standardization of application conditions in the technological, construction, food and agriculture fields

- Tax exemption – 10,000 RON per month

- Exemption for income from individual employment contracts

**5821** – Editing computer games, **5829** - Editing of other software products, **6201** – Custom software development activities (client-oriented software), **6209** - Other information technology services activities., **5510** - Hotels and other similar accommodation facilities, **5520** - Short-stay and holiday accommodation facilities, **5530** - Caravan parks, campgrounds, and camps, **5590** - Other accommodation services , **5610** - Restaurants, **5621** – Catering services for events, **5629** - Other food service activities not elsewhere classified, **5630** - Bars and other beverage-serving activities, **6910** – Legal activities – only for professional companies with legal personality, established by lawyers in accordance with the law, **8621** – General medical practice activities, **8622** - Specialized medical practice activities, **8623** - Dental practice activities, **8690** - Other human health activities.

- ❖ If a microenterprise discontinues the specific activities mentioned and the revenues drop below 60,000 euros, it can return to the 1% tax rate.
- ❖ If a microenterprise generates income from activities not related to those included in the above-mentioned CAEN codes, the 3% tax rate also applies to these revenues. The change takes effect from the quarter in which such situations are recorded.
- ❖ The change in the tax regime (due to non-compliance with conditions or by choice) is communicated by March 31st of the fiscal year in which this transition occurs.

### (3) Titles IV and V – Income Tax and Mandatory Social Contributions

#### A. **The tax incentive applicable to computer software development activities**

- ❖ **These provisions apply from November 1, 2023.**
- ❖ The conditions for applying tax incentives in the fields of computer software development, construction, and the food, agriculture, and industry sectors are standardized.
- ❖ The applicability of all the aforementioned tax incentives is limited in time, specifically until December 31, 2028 inclusive.
- ❖ **The income tax exemption** is limited to a monthly amount of lei 10,000 for gross salaries and salary-equivalent income earned as a result of computer software development activities.
- ❖ The exemption is valid at the location where the person carries out their main activity.
- ❖ The exemption applies to income obtained based on an individual employment contract, a service agreement, a delegation or secondment agreement, or in the case of a special status provided by law, depending on the situation.

<ul style="list-style-type: none"> <li>• CAS discount of 4,75%</li> <li>• Option to pay the contribution to private pension funds</li> <li>• Removal of CASS/CAS/CAM payment exemption</li> <li>• November 1, 2023</li> <li>• January 2024</li> <li>• Meal vouchers and holiday vouchers</li> <li>• CASS calculation base</li> <li>• Tourist, treatment and transport services during vacation</li> <li>• Elimination of progressive ceilings of 6, 12, 24 gross minimum wages per economy</li> <li>• CASS</li> </ul>	<ul style="list-style-type: none"> <li>❖ <b>The social insurance contribution rate</b> is reduced by the percentage points corresponding to the contribution rate to privately managed pension funds (i.e., 4.75% starting 1 January 2024).</li> <li>❖ Employees may opt to contribute to private pension funds.</li> <li>❖ The provisions apply starting from the income of the month following the entry into force of Law No. 296/2023.</li> </ul> <p><b>B. Tax incentives applicable in the construction sector, the food industry, and agriculture.</b></p> <ul style="list-style-type: none"> <li>❖ Starting with the income of the month following the entry into force of Law No. 296/2023, the exemption from paying CASS (social health insurance contribution), CAS (social insurance contribution) for special and special working conditions, as well as the reduced rate of social insurance contribution for labor (CAM), is eliminated.</li> <li>❖ <b>These provisions apply from November 1, 2023.</b></li> <li>❖ These tax incentives also apply at the location where the employees' primary function is located.</li> </ul> <p><b>C. Salary benefits</b></p> <ul style="list-style-type: none"> <li>❖ Starting with the income of January 2024, the value of meal vouchers and holiday vouchers is included in the calculation base for CASS (social health insurance contribution).</li> <li>❖ Employers may provide employees and their families with tourism, treatment, and transportation services during their leave, in accordance with the provisions of the employment contract, internal regulations, or special laws, or funded from the budget.</li> <li>❖ These benefits are limited annually and are based on the level of the average gross salary used for the state social insurance budget of that year.</li> <li>❖ These provisions <b>do not</b> apply to employees who receive holiday vouchers.</li> </ul> <p><b>D. Independent activities</b></p> <ul style="list-style-type: none"> <li>❖ Starting with the income of the year 2024, the progressive caps of 6, 12, 24 times the gross minimum wage for the calculation of CASS are eliminated.</li> <li>❖ For net income from self-employed activities below 6 times the gross minimum wage, no CASS is owed if the individual earns annual salary income or income from other sources greater than 6 times the gross minimum salary level.</li> <li>❖ CASS is owed, capped at the level of 60 times the national gross minimum salary.</li> </ul>
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- 60 gross minimum wages per country

- ❖ The minimum salary in effect at the deadline of filing the declaration for estimated income tax/the income norm to be earned in Romania, and the due social contributions, is applied.
- ❖ The caps for CASS are applied separately for self-employed activities and other income (dividends, rent, share transfers).
- ❖ CASS related to income from self-employed activities is a deductible expense for determining the income tax liability.

#### E. Income with an unidentified source

- 70% tax on income with an unidentified source

- ❖ Starting from July 1, 2024, the income tax rate applicable to the income assessed by the tax authorities, in accordance with the Fiscal Procedure Code, as income for which the source is unknown, is increased from 16% to 70%.

#### F. Other types of income

- Sports activity contracts
- Recalculation and payment of differences
- Intellectual property rights, lease or associations with legal entities
- 10% CASS calculation basis for other income

- ❖ **Contracts for sports activities** – income payers calculate and withhold CASS at the time of payment of income, by the 25th day of the following month in which it was withheld.
- ❖ If during the year there are multiple sources of income or significant income from sports activities, taxpayers may be subject to recalculating and paying the differences. These differences can be offset or refunded according to established rules.
- ❖ **Intellectual property rights, leases, or associations with legal entities** – income payers are required to calculate, withhold, and pay CASS, as well as to file the corresponding declaration.
- ❖ **Other income** – a CASS calculation base of 10% is introduced, applied based on progressive levels of the minimum wage (6-12-24 times the minimum wage).
- ❖ In this last case, CASS is owed if the income is at least 6 times the gross minimum wage. Option based, it can also be declared for income below this level.

#### (4) Title VII – VAT

- Increased VAT rate
- Food delivery
- Housing

- ❖ **The changes related to VAT apply from January 1, 2024.**

#### A. VAT increases from 5% to 9%

- ❖ The increased rate is applied in the following situations:
  - The supply of high-quality food products (mountain, organic, traditional);



<ul style="list-style-type: none"> <li>• Photovoltaic panels</li> </ul>	<ul style="list-style-type: none"> <li>• The supply of homes as part of social policy (with a maximum usable area of 120 square meters, excluding household outbuildings, whose value, including the land they are built on, does not exceed 600,000 lei, excluding VAT);</li> <li>• The supply of homes as part of social policy (with a maximum usable area of 120 square meters, excluding household outbuildings, whose value, including the land they are built on, does not exceed lei 600,000, excluding VAT);</li> <li>• The supply and installation of components for repairing and/or expanding systems as a component of construction supplies or as optional extras when delivering a construction;</li> <li>• Access to fairs, amusement parks, and recreational parks, whose activities are classified under NACE 9321 and 9329, trade fairs, exhibitions, cinemas, and cultural events, other than those exempt from tax;</li> <li>• Access to sport events.</li> </ul>
<ul style="list-style-type: none"> <li>• Definition of inhabited dwelling</li> </ul>	<ul style="list-style-type: none"> <li>❖ In the case of construction supplies, the definition of "a dwelling that, at the time of delivery, can be lived in as such" is amended as follows: <ul style="list-style-type: none"> <li>• It has unrestricted individual access to the living space without disrupting the possession and exclusive use of the space held by another person or family;</li> <li>• It has access to electricity and potable water, controlled disposal of wastewater and household waste;</li> <li>• The dwelling consists of at least one space for rest, one space for food preparation, and a sanitary group</li> <li>• It has exterior and interior finishes;</li> <li>• It includes sanitary installations and sanitary fixtures;</li> <li>• It includes electrical installations.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Transitional measures</li> </ul>	<ul style="list-style-type: none"> <li>❖ Transitory measures are established for the supply of dwellings for which contracts have been concluded by December 31, 2023, and which will be delivered between January 1 and December 31, 2024, to apply the reduced VAT rate of 5% or 9%.</li> </ul>
<ul style="list-style-type: none"> <li>• VAT</li> <li>• 19%</li> </ul>	<p><b>B. The VAT rate increases from 9% to 19% for the following:</b></p> <ul style="list-style-type: none"> <li>• The supply of non-alcoholic beer</li> <li>• The supply of non-alcoholic beverages falling under NC code 2202</li> <li>• Food products with added sugar (over 10g/100g of the product), except for sponge cake and biscuits</li> </ul>
<ul style="list-style-type: none"> <li>• Sports facilities – right of use</li> </ul>	<p><b>C. The VAT rate increases from 5% to 19% for the following:</b></p> <ul style="list-style-type: none"> <li>• <b>The right to use sports facilities</b>, except for those exempted, with NACE 9311 and 9313;</li> <li>• Transport of people with historical trains or steam-powered vehicles on narrow-gauge lines for tourism or leisure purposes;</li> </ul>

- Transportation of people by different means
- 19%
- VAT exemption with right of deduction
- Operations performed to hospital units
- VAT exemption for operations carried out by non-profit entities
- Non-harmonised excise duties
- Products containing tobacco, liquids with/without nicotine, tobacco substitutes with/without nicotine
- Soft drinks with added sugar
- Cigarettes
- Prior notification/ authorization request to the competent

- Transport of people using cable transport installations - cable car, gondola lift, chairlift, ski lift - for tourism or leisure purposes;
- Transport of people with animal-drawn vehicles used for tourism or leisure purposes;
- Transport of people with boats used for tourism or leisure purposes.

**D. The VAT exemption with the right to deduct VAT is eliminated:**

- ❖ For operations performed towards state hospital units:
  - Construction, rehabilitation, and modernization services for state public hospital units;
  - Delivery of medical equipment, appliances, devices, and similar items;
  - Adaptation, repair, renting, and leasing of such goods.
- ❖ The VAT exemption remains in place only when these operations are carried out towards registered nonprofit entities in the public register organized by ANAF and are intended for hospital units owned and operated by the nonprofit entity or for those in the state public network.

**(5) Title VIII – Excise Duties and Other Special Taxes**

- ❖ Non-harmonized **excise duties** for the following products are introduced:
  - Products containing tobacco intended for inhalation without burning, falling under tariff code NC 2404 1 00, including those contained in cartridges delivered together with electronic cigarettes and other similar personal electronic vaporization devices under tariff code NC 8543 40 00.
  - Liquids with or without nicotine intended for inhalation without burning, falling under tariff codes NC 2404 12 00, 2404 19 90, including those contained in cartridges delivered together with electronic cigarettes and other similar personal electronic vaporization devices under tariff code NC 8543 40 00.
  - Products intended for inhalation without burning, containing tobacco substitutes, with or without nicotine, falling under tariff codes NC 2404 12 00, 2404 19 10, including those contained in cartridges delivered together with electronic cigarettes and other similar personal electronic vaporization devices under tariff code NC 8543 40 00.
  - Non-alcoholic beverages with added sugar, with a total sugar level between 5g - 8g/100ml.
  - Non-alcoholic beverages with added sugar, with a total sugar level exceeding 8g/100ml."
- ❖ The production, intra-community acquisition, or import of non-harmonized excise products **are subject to prior notification** (in the case of non-alcoholic beverages with added sugar) or **authorization** (for other products) by the competent customs authority.

<p>customs authority</p>	<ul style="list-style-type: none"> <li>❖ The excise tax rates for alcohol, alcoholic beverages, and processed tobacco increase starting from January 1, 2024.</li> <li>❖ From January 1, 2024, to December 31, 2024, inclusive, the excise tax rates for alcohol and alcoholic beverages will not be adjusted for consumer price increases.</li> <li>❖ From January 1, 2024, to March 31, 2024, inclusive, the specific excise tax rate for cigarettes is lei 540,938 per 1,000 cigarettes.</li> <li>❖ <b>New contraventions have been introduced in the field of excisable products (both harmonized and non-harmonized), and the amounts of the contravention fines for non-compliance with the applicable legislation have been increased.</b></li> </ul>
<ul style="list-style-type: none"> <li>• Special tax on immovable and movable assets of high value</li> <li>• 2,500,000 lei</li> <li>• Tax payment for individuals/legal entities owning luxury cars</li> <li>• 375,000 lei</li> <li>• Tax for 5 years</li> <li>• 0.3% rate</li> </ul>	<p><b>(6) A new title is introduced – the Special Tax on High-Value Real Estate and Movable Assets</b></p> <ul style="list-style-type: none"> <li>❖ <b>Persons obliged to pay the tax:</b> <ul style="list-style-type: none"> <li>• <b>Individuals</b> who, on December 31 of the previous fiscal year, own or have joint ownership of <b>residential buildings with a taxable value exceeding 2,500,000 lei</b>, located in Romania.</li> <li>• <b>Individuals and legal entities</b> that own <b>motor vehicles</b> registered or recorded in Romania, with an <b>individual</b> purchase value exceeding <b>375,000 lei</b>. The additional tax is due for a period of 5 years.</li> </ul> </li> <li>❖ The special tax on high-value real estate and movable property is calculated based on falling into one of the situations mentioned above: <ul style="list-style-type: none"> <li>• For <b>residential buildings</b>, it is calculated at a rate of <b>0.3%</b> on the difference between the taxable value of the building communicated by the local tax authority through the tax assessment decision and the threshold of <b>lei 2,500,000</b>.</li> <li>• For cars, it is calculated at a rate of <b>0.3%</b> on the difference between the purchase value and the threshold of <b>lei 375,000</b>.</li> </ul> </li> <li>❖ The special tax on high-value real estate and movable assets is due for the entire fiscal year.</li> </ul>
<ul style="list-style-type: none"> <li>• Ro e-Invoice</li> <li>• Taxable persons established in Romania</li> </ul>	<p><b>(7) The obligation to report issued invoices in the national system RO e-Invoice is extended.</b></p> <ul style="list-style-type: none"> <li>❖ (i) Taxable persons <b>established in Romania, whether or not registered for VAT</b>, and (ii) taxable persons not established in Romania but registered for VAT, are obliged to implement the national electronic invoicing system RO e-Invoice for supplies of goods and services that take place in Romania, whether or not the recipients are registered in the RO e-Invoice Registry.</li> <li>❖ The transmission of invoices issued for VAT-exempt transactions (intra-Community supplies and exports) is not mandatory.</li> </ul>

<ul style="list-style-type: none"> <li>• Deadline of 5 working days</li> <li>• Fines between 2,500 lei and 10,000 lei</li> <li>• January 1, 2024 – March 31, 2024</li> </ul>	<ul style="list-style-type: none"> <li>❖ The transmission of the invoices mentioned above to recipients is mandatory for the purposes of Article 319 of the Fiscal Code (<b>a mandatory form requirement for VAT deduction</b>), except in cases where both the supplier and the recipient are registered in the RO e-Invoice Registry.</li> <li>❖ The deadline for sending invoices is 5 working days from the date of issuing the invoice, but no later than 5 working days from the 15th of the following month in which the advances were received.</li> <li>❖ Failure to meet the mentioned deadline is considered a contravention and is penalized as follows: <ul style="list-style-type: none"> <li>• Large taxpayers: fine ranging from 5,000 lei to 10,000 lei;</li> <li>• Medium taxpayers: fine ranging from 2,500 lei to 5,000 lei;</li> <li>• Other legal entities and individuals: fine ranging from 1,000 to 2,500 lei.</li> </ul> </li> <li>❖ The above-mentioned fines do not apply during the period from January 1, 2024, to March 31, 2024.</li> </ul>
<ul style="list-style-type: none"> <li>• B2B</li> </ul>	<ul style="list-style-type: none"> <li>❖ <b>Starting from July 1, 2024, for transactions between taxable persons established in Romania, concerning the supply of goods and the provision of taxable services in Romania, conducted in a B2B relationship, only invoices transmitted through the RO e-Invoicing system are considered valid invoices. The use of electronic invoices requires acceptance by the recipient, except for invoices transmitted through the RO e-Invoicing system.</b></li> </ul>
<ul style="list-style-type: none"> <li>• Penalties equal to the amount of VAT entered in the invoice</li> </ul>	<ul style="list-style-type: none"> <li>❖ <b>Receiving and recording invoices by beneficiaries - taxable persons established in Romania, in a manner other than through the RO e-Invoicing system, for B2B transactions, is subject to a penalty equal to the VAT amount specified in the received invoice (the penalty applies to the supplier only).</b></li> </ul>
<p><b>(8) A new system, RO e-Seal, is introduced.</b></p>	
<ul style="list-style-type: none"> <li>• RO e-Seal</li> <li>• Transportation monitoring system</li> <li>• Fine of 20,000 – 50,000 lei</li> </ul>	<ul style="list-style-type: none"> <li>❖ The e-Seal system is introduced - an IT system that enables authorities to monitor certain points of diversion of road transport of goods. This system, composed of an e-Seal, records and transmits data to the computer application for tracking purposes.</li> <li>❖ The driver becomes responsible for the integrity of the seal once it is placed on the vehicle, whether it is in transit or destined for a final operator on national territory.</li> <li>❖ Failure to maintain the integrity of the seal is subject to a fine ranging from lei 20,000 to lei 50,000.</li> </ul>



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În acest moment, NOA operează din trei sedii la București, Cluj-Napoca și Londra.



**Otilia Pețu**  
Managing Partner  
otilia.petu@noagroup.ro



**Mircea Dumitrașcu**  
Partner  
mircea.dumitrascu@noagroup.ro



**Lidia Terzea**  
Partner  
lidia.terzea@noagroup.ro



**Diana Roșu**  
Tax Director  
diana.rosu@noagroup.ro