

LEGISLATION NEWSLETTER

(01/04/2026 - 30/04/2026)

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AMENDMENTS TO THE SUPPORT FOR UNEMPLOYED PERSONS AND PERSONS SEEKING EMPLOYMENT LAW

Available [here](#):

- ▶ On 22 January 2026, Amendments to the Support for Unemployed Persons and Persons Seeking Employment Law were adopted, which entered into force on 1 April 2026.
- ▶ The amendments provide for the abolition of job seeker status. Going forward, only unemployed status may be granted by the State Employment Agency.
- ▶ Section 12, Paragraph 1 of the Law has been supplemented with Clause 15, stipulating that unemployed status is lost if a person earns income subject to mandatory state social insurance contributions.
- ▶ Unemployed status is not lost where such income is earned for work performed prior to obtaining unemployed status, through participation in active labour market measures, or within the framework of short-term employment, provided that the total period during which such income is earned, calculated from the date of obtaining unemployed status, does not exceed 92 days for an employee or three months for a self-employed person, and the State Employment Agency has been duly notified.
- ▶ Interest income on savings, savings account interest, and dividends are not subject to mandatory state social insurance contributions and do not affect the acquisition or retention of unemployed status or the entitlement to unemployment benefits.
- ▶ Here are listed the most significant amendments from the perspective of BDO Law, which do not reflect the full scope of the amendments.



AMENDMENTS TO THE LAW ON THE PREVENTION OF MONEY LAUNDERING AND TERRORISM AND PROLIFERATION FINANCING

Available [here](#):

- ▶ On 3 December 2025, Amendments to the Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing were adopted, which entered into force on 1 April 2026.
- ▶ The amendments implement the requirements of Directive (EU) 2024/1640 on mechanisms to be put in place by Member States to prevent the use of the financial system for the purposes of money laundering or terrorist financing.
- ▶ Section 18.³ of the Law has been supplemented with new exceptions, providing that a beneficial owner may request that information concerning them be concealed in the registers maintained by the Enterprise Register where public disclosure may pose a threat to the life, health or property of the beneficial owner or their family members, and there are objective grounds to believe that such threats may materialise. The beneficial owner may submit an application to the Enterprise Register requesting that information relating to them be classified as restricted access information.
- ▶ Upon receipt of the application, the Enterprise Register shall immediately, and in any event no later than one business day, conceal the relevant information for the duration of the examination of the application. The application shall be examined within one month. If no threats are identified, access to the information is restored. Where threats are identified, the information relating to the beneficial owner is classified as restricted access information. Information on that person as an individual merchant or shareholder (member) of a company also becomes restricted access information, where the beneficial owner status arises from this fact.
- ▶ The amendments also expand the scope of information on beneficial owners to be registered with the Enterprise Register, requiring disclosure of all nationalities of the beneficial owner, if any, as well as information on the extent of control exercised.
- ▶ Amendments relating to the concealment of beneficial owner information and the expanded scope of registered information will enter into force on 1 July 2026.
- ▶ Here are listed the most significant amendments from the perspective of BDO Law, which do not reflect the full scope of the amendments.



AMENDMENTS TO THE ELECTRONIC COMMUNICATIONS LAW

Available [here](#):

- ▶ On 5 March 2026, Amendments to the Electronic Communications Law were adopted, which entered into force on 2 April 2026.
- ▶ Section 28, Paragraph 1 of the Law has been supplemented, providing that the installation or construction of new electronic communications networks in jointly owned immovable property requires the approval of more than half of the co-owners. Accordingly, whereas previously the consent of all co-owners was required, it is now sufficient to obtain approval from more than half of the co-owners.
- ▶ The amendments further provide in Section 28, Paragraph 6 that, in certain cases, the coordination procedure may be replaced by notifying the immovable property owner or lawful possessor at least 30 business days prior to the commencement of works, for example, where the installation or construction of public electronic communications networks is provided for in the graphic part of a municipal territorial plan or local plan, or where the public electronic communications network has been granted the status of an object of national interest.
- ▶ Here are listed the most significant amendments from the perspective of BDO Law, which do not reflect the full scope of the amendments.



AMENDMENTS TO THE CRIMINAL LAW

Available [here](#):

- ▶ On 19 March 2026, Amendments to the Criminal Law were adopted, which entered into force on 16 April 2026.
- ▶ The purpose of the amendments is to strengthen victim protection, respond to new forms of crime (particularly in the digital environment), and ensure a more effective and fair criminal law framework. The amendments are extensive and affect multiple areas, including the introduction of new criminal offences, revision of sentencing policy, and clarification of certain offence elements.
- ▶ The Criminal Law has been supplemented with new Section 145.1, criminalising the distribution of intimate content without the consent of the depicted person, including cases where such content is created or altered using technology and artificial intelligence, as well as threats to distribute such content.
- ▶ The amendments significantly extend limitation periods for certain serious offences, including offences against the sexual integrity and morality of minors. The limitation period has been extended from 20 to 35 years. For offences against the sexual integrity and morality of minors punishable by life imprisonment, the limitation period has been extended from 30 to 40 years following the victim reaching the age of 18.
- ▶ The regulation of human trafficking has been expanded by clarifying the concept and supplementing forms of exploitation. The use of a person for surrogacy, forced marriage or illegal adoption is now considered exploitation. Criminal liability has also been introduced for the use of services provided by a victim of human trafficking, where the recipient is aware of such circumstance.
- ▶ Criminal liability for fraud has been introduced in Section 177, Paragraph 2 of the Criminal Law where fraud is committed by impersonating a public official, institution or company representative.
- ▶ Section 269 of the Criminal Law extends protection against attacks by establishing criminal liability for attacks on representatives of the emergency medical services.
- ▶ Penalties have been increased in Sections 220 and 245 of the Criminal Law for certain offences, including concealment of property and violations of information system security requirements, providing for harsher sanctions and differentiation based on the severity of the offence.



AMENDMENTS TO THE CRIMINAL LAW

- ▶ The Criminal Law has been supplemented with Sections 78.¹ and 79 on the protection of cultural and national heritage, including liability for endangering such values during armed conflict.
- ▶ The regulation on sentence reduction has also been supplemented, allowing its application where a convicted person has assisted in locating a person wanted in connection with a serious or especially serious crime.
- ▶ Here are listed the most significant amendments from the perspective of BDO Law, which do not reflect the full scope of the amendments.



AMENDMENTS TO THE CRIMINAL PROCEDURE LAW

Available [here](#):

- ▶ On 16 April 2026, Amendments to the Criminal Procedure Law were adopted, which entered into force on 21 April 2026.
- ▶ The amendments supplement Section 360, Paragraph 1 of the Criminal Procedure Law, providing that, in exceptional cases, the court may leave immovable property acquired through a criminal offence in the ownership of a third party, a bona fide acquirer, where returning the property to the victim does not ensure a fair resolution of criminal proceedings and the ownership rights are registered in a public register.
- ▶ The court may apply this exception only in exceptional cases, with specific justification and after assessing the factual circumstances of the case, including the interests of the victim and the bona fide acquirer, as well as the principles of proportionality and fairness.
- ▶ The purpose of the amendments is to strengthen the court's ability to ensure fair and individually assessed outcomes in situations where the automatic return of property to the victim could result in disproportionate consequences for a bona fide acquirer, while preserving the general principle of confiscation of criminally acquired property.
- ▶ The transitional provisions stipulate that the amendments apply to cases in which decisions were rendered from 1 January 2026. A third party, a bona fide acquirer, is entitled to apply to the Supreme Court by 1 July 2026 to have the issue of ownership of criminally acquired property reviewed on the grounds of newly discovered circumstances.

AMENDMENT TO THE IMMIGRATION LAW

Available [here](#):

- ▶ On 26 March 2026, an Amendment to the Immigration Law was adopted, which entered into force on 29 April 2026.
- ▶ The amendment provides that a temporary residence permit may also be revoked where, following an assessment by the competent state authorities, a foreign national is found to pose a threat to public order and security, including by repeatedly committing administrative offences (three or more times within a 12-month period) in the areas of public administration, public order, road traffic or child protection.



NEWS ON SANCTIONS

EU ADOPTS 20TH PACKAGE OF SANCTIONS AGAINST RUSSIA

Press release:

- ▶ The European Commission welcomed EU Member States' adoption of the 20th sanctions package against Russia, reaffirming the EU's unwavering support for a free and sovereign Ukraine and increasing pressure on Russia to negotiate on terms acceptable to Ukraine.
- ▶ The package introduces far-reaching energy measures, including new listings across Russia's energy sector, expanded action against the shadow fleet, stricter controls on tanker sales and maintenance, port bans, and a framework for a future maritime services ban on Russian oil.
- ▶ Financial sanctions are significantly strengthened through expanded bans on Russian and third country banks, a full prohibition on Russian crypto asset services, new restrictions on digital rouble related activity, and measures to block payment schemes used to bypass sanctions.
- ▶ Trade and military related measures target Russia's war economy through new export and import bans, restrictions on sensitive technologies and cybersecurity services, ammonia quotas, and extensive listings of Russian and third country companies supporting the military industrial complex.
- ▶ For the first time, the EU activated its anti-circumvention tool, responding to systematic sanctions evasion via third countries and adding dozens of Russian and non-Russian entities involved in re-exports and other circumvention practices.
- ▶ The package also enhances legal protection for EU operators, fights propaganda through action against mirror media outlets, safeguards EU research from Russian funding, and imposes additional listings on individuals and entities responsible for repression, propaganda, cultural looting, and other abuses.



US IMPOSES SANCTIONS ON 35 INDIVIDUALS, ENTITIES FOR AIDING IRAN'S SANCTIONS EVASIONS

Press release:

- ▶ U.S. imposed new sanctions on 35 entities and individuals tied to Iran's shadow banking network, accusing them of moving tens of billions of dollars to evade sanctions and finance terrorism, while warning banks against facilitating payments for passage through the Strait of Hormuz.
- ▶ Treasury specifically cautioned Chinese "teapot" refineries and financial institutions, highlighting their role in importing Iranian oil and using the U.S. financial system, and threatened sanctions against banks that support such transactions.
- ▶ The measures target networks linked to Iranian banks controlled by the supreme leader or affiliated with the military, as well as companies used to transfer funds for previously sanctioned Iranian actors, as part of a broader maximum pressure campaign.
- ▶ U.S. officials said the sanctions aim to cut Iran's oil revenues and disrupt financing for the IRGC and proxy groups, amid stalled efforts to end the ongoing Iran conflict and continued Chinese opposition to unilateral sanctions.

MYANMAR: EU RESTRICTIVE MEASURES EXTENDED UNTIL APRIL 2027

Press release:

- ▶ The EU has extended its restrictive measures on Myanmar for 12 months, until 30 April 2027, citing the continued grave situation marked by the undermining of democracy and serious human rights violations.
- ▶ The sanctions cover 105 individuals and 22 entities and include asset freezes, EU travel bans, arms and dual use export embargoes, bans on military cooperation, and the continued suspension of direct financial assistance to the junta.
- ▶ The EU strongly condemns the Myanmar military's actions since the February 2021 coup, calls for an end to violence and the release of arbitrarily detained prisoners, and reiterates its readiness to impose further targeted measures while standing with the people of Myanmar in their pursuit of democracy and peace.



UK GOVERNMENT AMENDS UK SYRIA SANCTIONS TO REMOVE TRADE RESTRICTIONS ON LUXURY GOODS, GOLD, PRECIOUS METALS, AND DIAMONDS

Press release:

- ▶ The Syria (Sanctions) (EU Exit) (Amendment) Regulations 2026, which entered into force on 22 April 2026, removed UK trade restrictions relating to luxury goods and to gold, precious metals, and diamonds under the Syria sanctions regime.
- ▶ As a result, it is no longer prohibited to export, import, supply, or make available these items to or from Syria, nor to provide related ancillary services such as brokering, financing, or technical assistance.
- ▶ The change lifts previous bans covering a wide range of high value goods, including luxury food and fashion items, vehicles, artwork, antiques, and commodities classified under specific HS codes for gold, precious metals, and diamonds.

US LIFTS SANCTIONS ON VENEZUELAN INTERIM LEADER DELCY RODRÍGUEZ

Press release:

- ▶ U.S. has lifted sanctions on Venezuela's interim president Delcy Rodríguez, removing her from the Specially Designated Nationals list less than three months after U.S. forces seized former leader Nicolás Maduro and his wife on drug trafficking charges.
- ▶ U.S. officials said the decision reflects improving relations and cooperation with Rodríguez's government, which took power after Maduro's removal, while Rodríguez hailed the move as a step toward normalising bilateral ties.
- ▶ Opposition groups criticised the decision, arguing that sanctions relief should be conditioned on the release of all remaining political prisoners, nearly 500 of whom are still detained despite recent amnesties.



US TREASURY DEPARTMENT PROPOSES RULE TO IMPLEMENT GENIUS ACT'S ANTI-MONEY LAUNDERING AND SANCTIONS COMPLIANCE PROGRAM REQUIREMENTS FOR STABLECOIN ISSUERS

Press release:

- ▶ On April 8, 2026, FinCEN and OFAC issued a joint proposed rule to implement the GENIUS Act, establishing anti money laundering and sanctions compliance requirements for permitted payment stablecoin issuers (PPSIs) while supporting innovation in stablecoin payments.
- ▶ The proposal would, for the first time, impose a binding regulatory obligation on PPSIs to adopt and maintain a formal sanctions compliance program, codified through a new OFAC regulation, rather than relying solely on non-binding guidance.
- ▶ PPSIs would be treated as financial institutions under the Bank Secrecy Act and required to operate risk-based AML/CFT programs, conduct customer due diligence, file suspicious activity reports for primary market activity, and comply with recordkeeping and information sharing rules.
- ▶ The rule also mandates technical capabilities to block, freeze, or reject impermissible transactions and to comply with lawful orders.
- ▶ As a key step in implementing the GENIUS Act enacted in July 2025, the proposal aligns sanctions compliance with OFAC's five pillar framework and is open for public comment until June 9, 2026.



To find out how we can help your business, we invite you to contact our team of experts, who will develop the most suitable and effective solution for your business needs.

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