

Currency regulation in Ukraine: Overview and martial law peculiarities

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32

years in Ukraine

500+

employees

AWARDS AND RECOGNITION



Gratitude from the President of Ukraine for supporting the country during the war

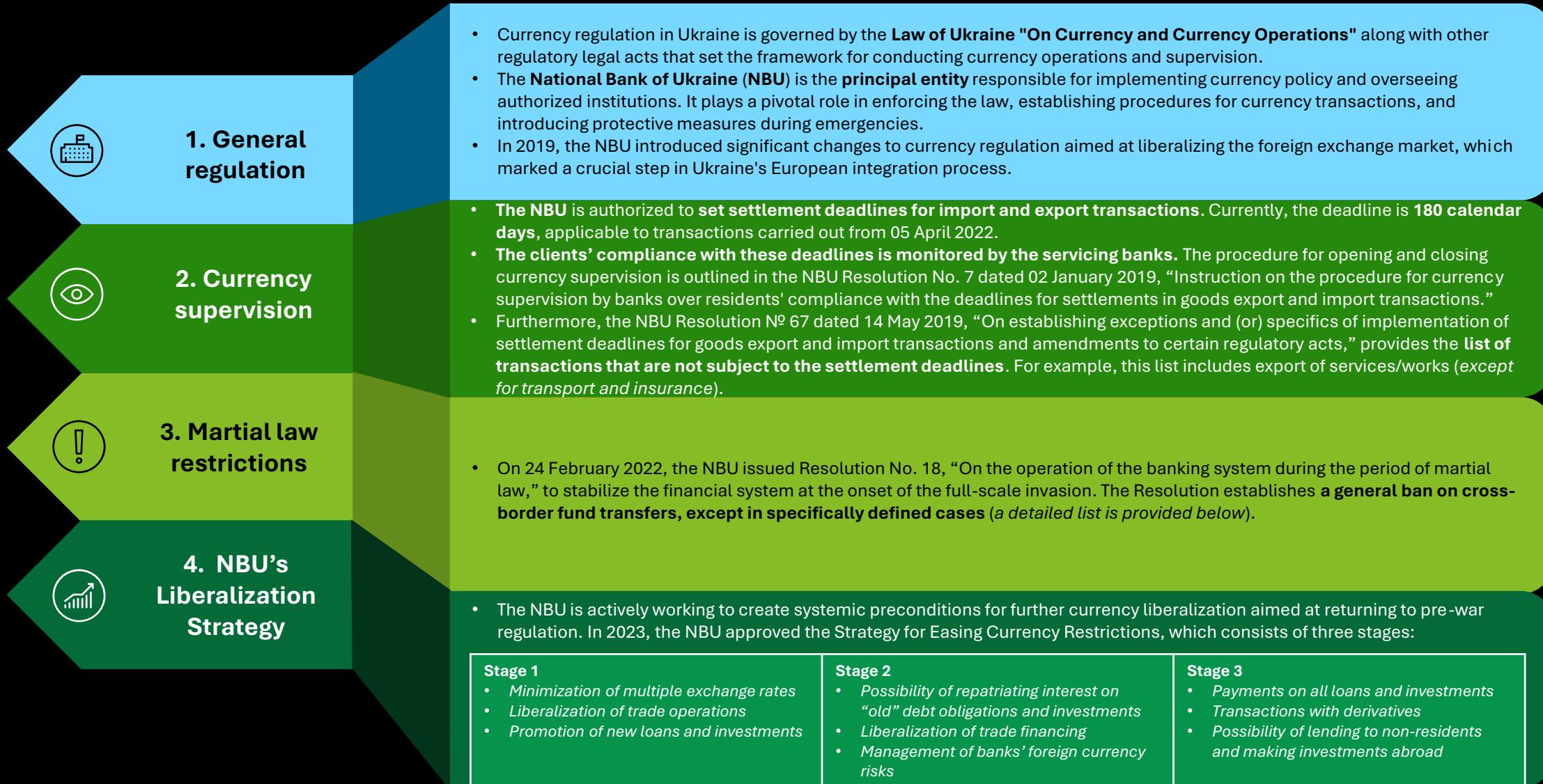
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Currency regulation: general overview



Permitted cross-border transactions (1/2)

The NBU periodically lifts previously imposed currency restrictions. The most significant easing since the start of the full-scale invasion took place in May 2024.



Payment for the import of all goods, works, and services, the delivery of which took place or is taking place after 23 February 2021.



Repatriation of dividends accrued based on the results of activities for the period from 01 January 2023. Monthly limit is EUR 1 million.



Transfer of funds abroad under leasing/rental agreements.



Repayment of “new” foreign loans (received from abroad after 20 June 2023), provided that the following conditions are met simultaneously:

- The prohibition on purchasing foreign currency to repay “new” cross-border loans now applies only to loans with a term of up to one year.
- Purchasing foreign currency to pay interest on all “new” loans is allowed regardless of the loan term.



Payment of interest on “old” cross-border loans (received before 20 June 2023), provided that the following conditions are met simultaneously:

- Interest under the loan agreement is payable for the period starting from 24 February 2022.
- No overdue debt under the loan agreement as of 24 February 2022.
- Under a single agreement, no more than the equivalent of EUR 1 million per one calendar quarter may be transferred for interest payments overdue as of 01 May 2024. This restriction does not apply to future scheduled interest payments.
- Purchase and transfer of funds obtained through loans or credits (including repayable financial aid) from residents are prohibited.
- No provision for early payment or restructuring of overdue payments.



Payments for the return of erroneously transferred funds in foreign currency that were credited to customer accounts from 07 August 2025.



Repayment of loans that were fully or partially granted with the participation of an MFI, a foreign export credit agency, a foreign state through its authorized representative, or a foreign entity whose participants (shareholders) include a foreign state or a foreign bank.



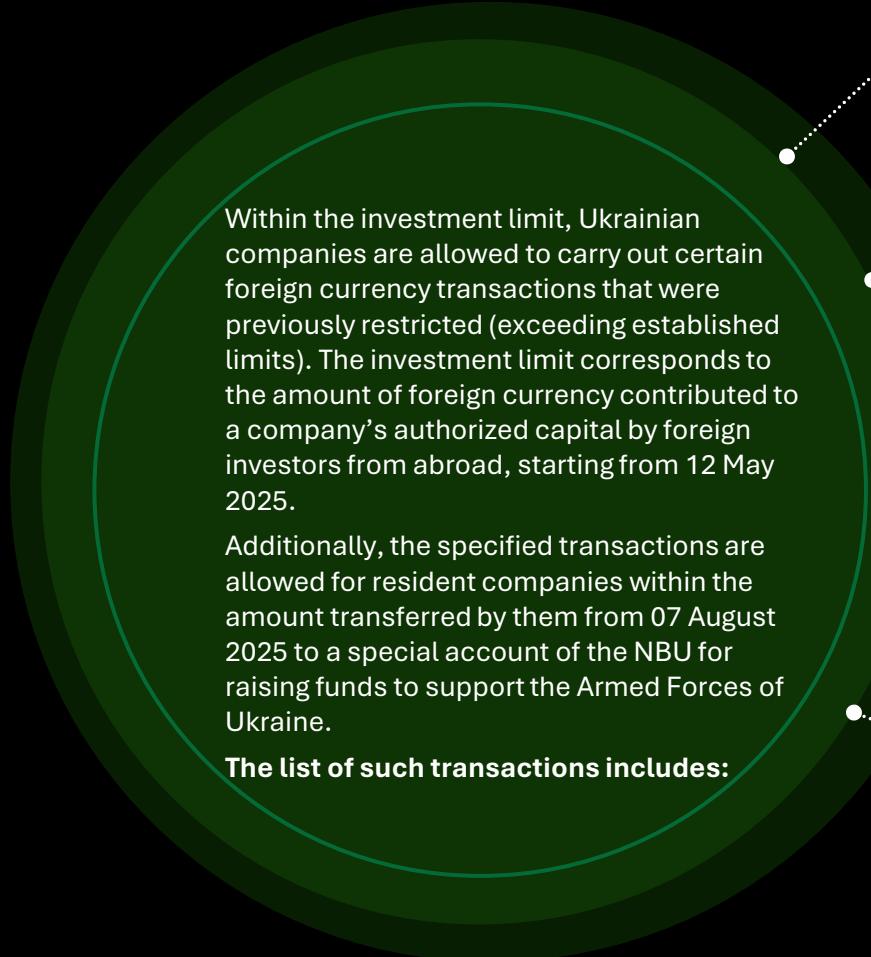
Transfers by Ukrainian legal entities to the accounts of their own branches, representative offices, or other separate divisions, subject to compliance with specific requirements. Annual limit is EUR 1 million but can be increased under certain conditions.



Representative offices of international card payment systems and foreign airlines are allowed to purchase and transfer foreign currency for the benefit of their parent companies. The monthly limit for such transactions is set at the equivalent of EUR 5 million.

Permitted cross-border transactions (2/2)

In May 2025, the NBU launched a **stimulating currency liberalization** initiative aimed at attracting additional capital into the Ukrainian economy by encouraging inflows of funds through the introduction of an investment limit.



A mandatory requirement is that these transactions must be conducted through a single servicing bank, which the company selects independently and may change if needed.

Payments for imports of goods delivered on or before 23 February 2021

Refunds to non-resident buyers of advance payments for goods made before 23 February 2022

Fulfillment of debt obligations under the “old” external loans received before 20 June 2023

Financing of foreign representative offices/branches of Ukrainian companies in excess of the separately established limit for such purposes

Repatriation of dividends to a foreign investor/non-resident in excess of the separately established limit for such purposes

How can Deloitte Ukraine help?

Deloitte.

**Your
Questions –
Our
Expertise**



- » Payment of “new” dividends
- » Repayment of loans and interest
- » Contractual set-off
- » Contribution of debt to the authorized capital
- » Matters related to the application of settlement deadlines for import/export transactions



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