

## Currency regulation in Ukraine: Overview and martial law peculiarities

January 2026

# Our Team in Ukraine



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years in Ukraine

**500+**

employees

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## AWARDS AND RECOGNITION



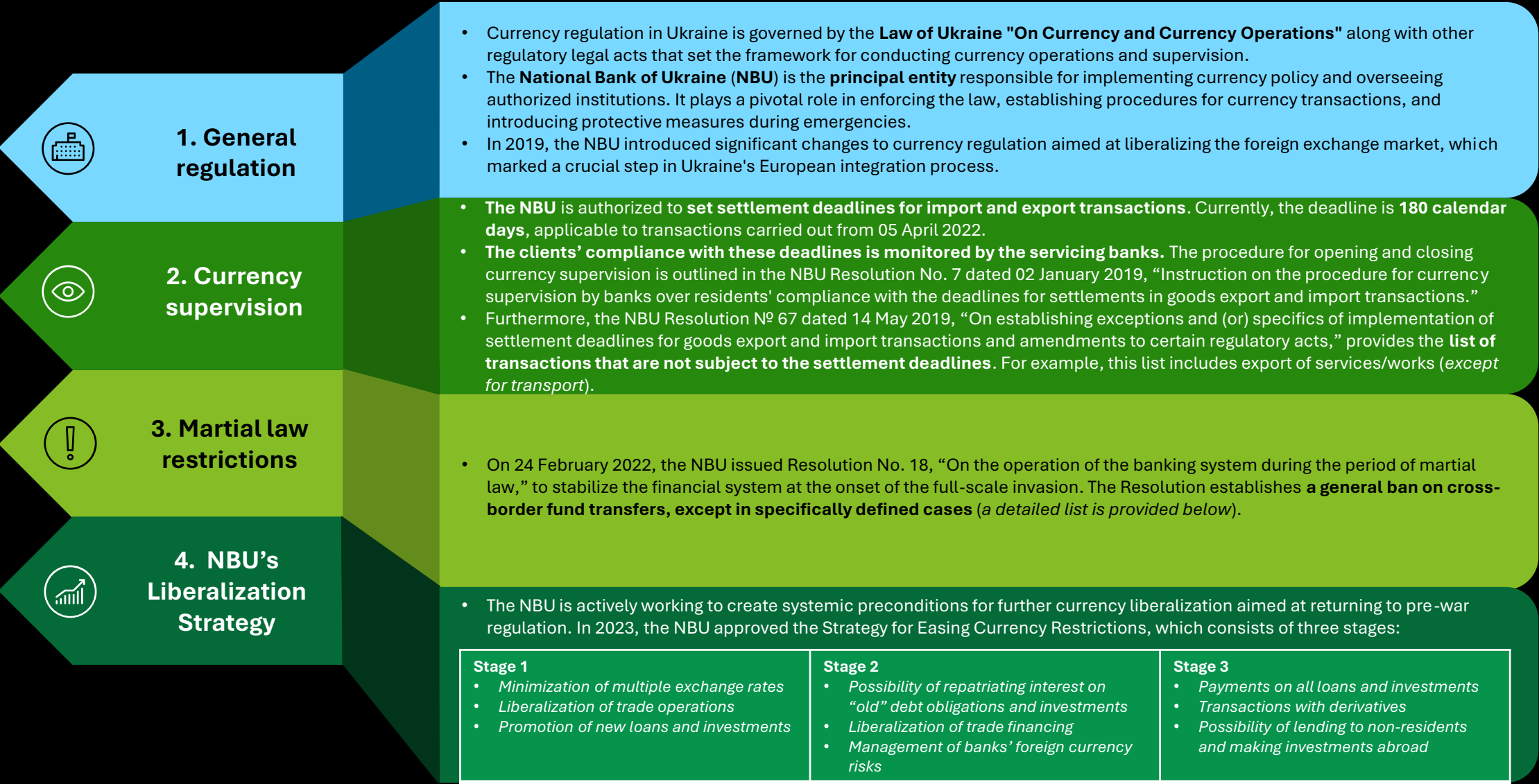
2024  
Gratitude from the President of Ukraine for supporting the country during the war

2022  
Deloitte Ukraine was included in the global ranking of Financial Times Innovative Lawyers

The Legal 500  
Deloitte Ukraine has been recognized in The Legal 500 rankings for its Banking, Finance, and Capital Markets practices

Forbes  
Forbes Ranking of Top 50 Wartime Employers

# 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.

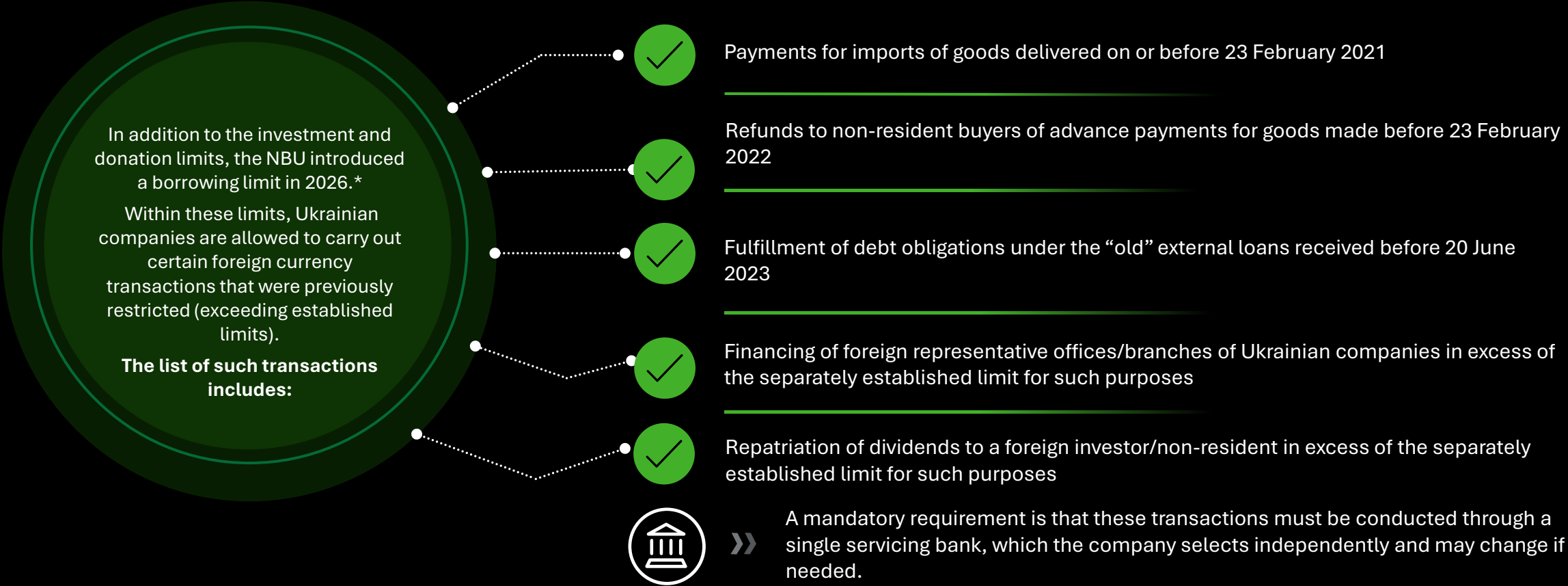


Representative offices of international card payment systems and foreign airlines are allowed to purchase and transfer foreign currency for the benefit of their parent companies. The monthly limit for such transactions is set at the equivalent of EUR 5 million.



Payments to accounts of customers in foreign banks to refund payment for returned or undelivered goods under certain conditions.

# 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 the investment limit. Later the NBU introduced donation and borrowing limits:

The <b>investment limit</b> corresponds to the amount of foreign currency contributed to a company’s authorized capital by foreign investors from abroad, <b>starting from 12 May 2025</b> .	The <b>donation limit</b> is equal to the total amount of funds that the company has transferred <b>since August 7, 2025</b> , to a special account of the NBU for raising funds to support the Armed Forces of Ukraine.	The <b>borrowing limit</b> is equal to the amount of funds received from abroad under a new loan/credit in foreign currency to the company’s account opened in Ukrainian bank <b>after 1 January 2026</b> .
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# How can Deloitte Ukraine help?



- » 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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