

## Germany's 2025 Coalition Agreement

Key Legal & Tax Implications for Foreign and U.S. Investors

Nashville, June 2025

# Corporate Tax Reforms & Incentives

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- Gradual corporate tax rate cut from 15% to 10% (2028-2032).
  - Total income tax amounts to 25% including trade tax
- 30% declining balance depreciation on equipment (2025–2027).
- Applies to corporations and partnerships only (via §1a KStG and §34a EStG).
- Transition to and support for self-assessed corporate tax systems.
- Minimum trade tax multiplier raised to 280% to curb tax avoidance (previously 200%).
- Enhanced R&D tax credits and procedures.

# Tax Reforms & Incentives

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- Special tax write-offs and depreciation for EVs, E-vehicles subsidized up to €100,000 (previously €70.000).
- EVs exempt from vehicle tax until 2035.

# **International and Global Tax Relevance**

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- Support for global minimum tax (OECD framework).
- Push for EU-wide financial transaction tax (FTT).

## **VAT and Indirect Taxes**

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- 7% VAT on restaurant food from 2026.
- VAT exemptions for charitable donations.
- Import VAT shifted to a credit-offset model.

# **Income and Payroll Tax Measures**

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- Lower income taxes for low/mid-income earners.
- Tax-free overtime pay and incentives for longer working hours.
- Bonuses for switching from part-time to full-time get tax benefits.

# Legal Frameworks for Nonprofits

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- Higher tax-free thresholds for nonprofits (€50k from activities).
- Simplified compliance for nonprofits under €100k revenue.

# **Labour Market & Immigration**

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- Creation of 'Work-and-Stay' agency to streamline skilled immigration.
- Faster recognition of foreign qualifications (max. 8 weeks).
- Up to €2,000/month tax-free for post-retirement work.

## **Investment Support & Strategic Funds**

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- Launch of a €10 billion Germany Fund (leveraged up to €100 billion).
- Focus on mid-sized businesses and scale-ups.
- Support for venture capital, including female founders.
- Extended Future Fund and Solvency II reform to mobilize private capital.

# Digitalization & Startup Reforms

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- One-stop digital platform for business registration (within 24 hours).
- Simplification of notarial procedures and digital documentation.
- Support for AI, robotics, additive manufacturing, and biotech.
- Startup equity participation tax improvements.

## **Legal Reforms & Investment Protection**

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- New Foreign Trade Law: Blocks non-trusted foreign investments in critical infrastructure.
- Faster export licensing with random inspections replacing full audits.

# **Energy, Environment & Infrastructure**

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- Industrial power cost reduction: End of gas storage levy.
- Expansion of hydrogen infrastructure and carbon capture legal framework.
- Promotion of decarbonized steel and chemical industry.
- Expansion of battery, chip, and semiconductor production.

# **Trade, Foreign Policy & Global Alignment**

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- Support for new EU trade deals (e.g., Mercosur, Mexico, ASEAN).
- Pursuit of U.S.-EU Free Trade Agreement.
- EU-level reforms for WTO and export control systems.
- De-risking strategy with China and secure supply chain policies.

## Implications for U.S. Investors

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- Germany is positioning as a competitive, innovation-driven economy.
- Improved regulatory clarity and streamlined investment procedures.
- Attractive environment for EVs, biotech, and AI sectors.
- Clear protection of national security interests in critical infrastructure.

## Kontaktdaten



StB Dr. rer. pol. **Peter Happe**, Diplom-Kaufmann, ist Partner der GHM GmbH Steuerberatungsgesellschaft, Köln. Dr. Happe ist Mitglied des Beirats des Frankfurter Fondsinitiators HABONA. Zuvor war er Vorstandsmitglied und CFO eines Immobilien Private Equity Fonds in Zürich, Partner im Frankfurter Büro der US-Kanzlei Dewey Ballantine sowie Steuerberater der internationalen Kanzlei Clifford Chance und war u. a. auch in New York als C.P.A. tätig. Von 1993 bis 1997 war er wissenschaftlicher Mitarbeiter bei Prof. Dr. Dr. h.c. Baetge an der Universität Münster. Dr. Happe ist ständiger Dozent bei IWW und war außerdem Dozent an der Bundesfinanzakademie, bei Euroforum, Management Circle, IIR, und Lehrbeauftragter an der TU Dresden sowie an der Zeppelin University in Friedrichshafen.

- Examen 1993 in Münster
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- Certified Public Accountant (State of New York) 2000
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Dr. Peter Happe spricht Deutsch als Muttersprache und Englisch flüssig und verhandlungssicher.

## Auszeichnungen



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