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COMPREHENSIVE IMMIGRATION AND TAX GUIDE TO RELOCATING TO WORK IN MONTENEGRO

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GUIDE TO RELOCATION TO WORK IN
MONTENEGRO

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I IMMIGRATION

I.1 Types of stay

A foreign national may stay in Montenegro:

- (i) on a short-term basis;
- (ii) on the basis of a visa D (long-stay visa);
- (iii) on the basis of temporary residence; or
- (iv) on the basis of permanent residence status.

I.2 Short stay and the right to work

I.2.1 Visa-free stay

Montenegro extends visa-free regime for short stay to citizens of a number of countries. The duration of permitted visa-free stay depends on the foreigner's citizenship but cannot in any event exceed 90 days within the 180-day period from the date of the foreigner's initial entry into Montenegro. Information on eligible countries and permitted duration of visa-free short stay is available on the web site of the Montenegrin Ministry of Foreign Affairs. During this type of stay, foreigner is not entitled to work.

I.2.2 Visa C (tourist visa)

Foreigners from certain countries need visa C to enter Montenegro. The list of such countries is available on the web site of the Montenegrin Ministry of Foreign Affairs. Visa C is valid for a stay which does not extend beyond 90 days within the 180-day period that starts from the person's initial entry into Montenegro.

Visa C is issued for one, two, or multiple entries into Montenegro. Visa C for multiple entries is issued with a validity period of six months to five years, if: (i) the applicant has demonstrated justification for frequent travel (e.g. business or family reasons), and (ii) there is no ground to believe the applicant does not have genuine intention to leave the territory of Montenegro before the expiration of the requested visa. Additionally, a foreigner who comes to Montenegro for private or business visit may be asked to submit an invitation letter or another form of guarantee that they have their costs expenses during the stay in Montenegro covered, including cost of accommodation, living costs, and the cost of return ticket. Visa C is not a guarantee that a foreigner will be granted entry into Montenegro.

Visa C application must be submitted to Montenegro's diplomatic and consular office or its representation in the country of the applicant's residence (detailed information about available consular representation can be found on the website of the Montenegrin Ministry of Foreign Affairs). The application can be submitted in-person or in electronic form. Exceptionally, the visa application can be submitted to a foreign legal entity licensed by Montenegrin Ministry for Foreign Affairs.

Foreigner applying for visa C must have a passport that is not older than 10 years and is valid for at least three months beyond the planned date of departure from Montenegro. The passport must contain at least two consecutive blank pages.

The decision on the visa application is supposed to be made within 10 days from the date of submission. The deadline can be extended, but cannot exceed 30 days in total or 60 days, when submission of additional documentation is required.

Applications for the issuance of visa C can be submitted no later than 15 days prior to the intended travel date. Visas can be granted even if the application is made outside these deadlines, but only in the presence of justified humanitarian reasons (e.g. force majeure, serious illness or permanent disability of the applicant).

During visa C stay, foreigner is not entitled to work.

I.2.3 Work certificate

Foreigners falling, *inter alia*, into one of the following categories can stay and work in Montenegro for up to 90 days within a one-year period subject to work registration in Montenegro:

- 1) founders, members of management and executive bodies, and auditors engaged by a company.
- 2) guest professors, lecturers, and scientists participating in a significant scientific research project for Montenegro;
- 3) guest lecturers at professional meetings and seminars;
- 4) artists and entertainers, and accompanying technical staff if they do not stay in Montenegro for more than 30 days continuously or three months in total within a year;
- 5) authors and performers and accompanying technical staff, if they do not stay in Montenegro for more than 30 days continuously or three months in total within a year;
- 6) employees of foreign companies who provide training and development for employees of a related Montenegrin entity;
- 7) sportists;
- 8) temporary workers delivering, assembling, or servicing machinery or equipment, if they do not work for more than 30 consecutive days or a total of three months per year with breaks.

Work registration is initiated by the host with the Ministry of Internal Affairs before the guest foreigner commences work in Montenegro.

I.3 Visa D (long-stay visa) and the right to work

Foreigner intending to stay in Montenegro for more than 90 days, but not more than 180 days within a one-year period following the first entry into Montenegro, needs either visa D or temporary residence permit.

Visa D is issued for one or multiple entries into Montenegro.

The requirements for visa D and the deadline for its issuance are the same as outlined in Section I.2.2 for visa C.

Visa D is, *inter alia*, issued in the following cases:

- (i) when applying for integrated permit to pursue business activity or work in Montenegro (see Section I.4.1), based on a host's invitation letter and guarantee for the costs of stay in and return from Montenegro;
- (ii) when applying for temporary residence permit on the basis of being digital nomad (see Section I.4.3), based on an employment or other type of engagement with a foreign company and the proof of existence of such foreign company;
- (iii) family reunion;
- (iv) education, participation in international student exchange or other youth programs;

- (v) specialization, professional training or practical work, scientific research;
- (vi) medical treatment;
- (vii) use or management of property owned in Montenegro.

Specific documentary requirements are established for each intended purpose of entry and stay.

I.4 Temporary residence in Montenegro and the right to work

Temporary residence with the right to work can be granted to a foreigner who intends to stay in Montenegro for more than 90 days, *inter alia*, on the following basis:

- 1) employment;
- 2) family reunion;
- 3) digital nomad status.

I.4.1 Employment

Foreigner intending to reside and work in Montenegro for more than 90 days on the basis of employment, seasonal employment, contract for service or intragroup secondment must obtain an integrated permit permitting temporary residence and work in Montenegro permit. The foreigner who entered the country on visa D must apply for integrated permit within ten days from the date of visa D issuance.

The application for integrated permit can be submitted online or personally by a foreigner to the Ministry of Internal Affairs at the intended place of residence, together with specifically prescribed list of documents certifying that the foreigner is eligible for the permit. The foreigner who applies for a permit electronically will nevertheless have to physically present himself/herself in the police station within ten days from entering Montenegro to leave e his/her biometric data.

The foreigner applying for integrated permit must have a passport valid for at least three months beyond the sought duration of the integrated permit. The applicant can remain in Montenegro while their application for integrated permit is being processed, provided they have a legal basis for stay in Montenegro when applying (e. g. they are from the country on the visa-free regime or have entered the country on visa D, and have not exceed the permitted period of stay).

Upon the receipt of the application, the Ministry of Internal Affairs issues a confirmation specifying the deadline within which the applicant can collect the permit, with is usually 15 days. The permit can be collected either in person or via proxy.

Integrated permit is approved for up to one year and can be extended for the same period multiple times provided that they are employed full-time and that the conditions for temporary residence and work persist.

Work in IT and healthcare sectors

Foreign employees working in Montenegro in IT and healthcare sectors can obtain integrated work and residence permit if their employment agreement is for a minimum of 12 months. The permit can be issued for a period of up to three years and is renewable for one additional three-year period.

Integrated permit is subject to annual quotas, which are published by the Government of Montenegro usually in November for the following year. The Government determines the sectors in which the foreigners may be employed, as well as a maximum number of work permits that can be issued during the year within each sectors for regular and for seasonal employment. Integrated permits for, *inter alia*, the following categories of work are not subject to any quota:

- 1) white collar positions, such as the role of general manager and managerial position that requires a university degree;
- 2) self-employment with a registered entrepreneurship;
- 3) temporary assignment to a position of manager, specialist or trainee in a Montenegrin company (see Section I.4.1.4);
- 4) contract for services (see Section I.4.1.3);
- 5) employees in the IT sector
- 6) employees assigned to Montenegro based on a staff leasing arrangement;
- 7) daily migrants;
- 8) work on a development project from the annual list of the projects vetted by the Government of Montenegro;
- 9) citizens of a EU Member state or their family member (regardless of their nationality), as well as a citizens of Iceland, Liechtenstein, Norway, and Switzerland.

I.4.1.1 Regular Employment

If integrated permit is issued on the basis of regular employment agreement with a Montenegrin employer, the employer must register the employee with the Tax Authority within 24 hours after the issuance of the integrated permit.

The integrated permit issued for the purpose of employment is valid only for the specific job with a specific employer designated in the application. By way of an exception to this rule, the foreigner who obtain integrated permit on the basis of their employment in the role of general manager of the sponsor company can serve as general manager in other Montenegrin companies on the basis of the same permit.

Integrated permit is issued with the validity period of up to one year and can be extended for a maximum period of two years, provided that the foreigner is employed on a full-time basis. As an exception to this rule, integrated permit issued to a foreigner who is a majority owner and a director of a Montenegrin company is subject to unlimited extensions for as long as the conditions for temporary residence and work persist, provided the company has paid at least EUR 5,000 in taxes and social contributions in the previous year. This condition does not apply to the citizens of EU Member States and their family members (regardless of nationality), and the citizens of Iceland, Liechtenstein, Norway, and Switzerland.

If the foreigner does not commence work within the deadline specified in the employment agreement, the employer is obliged to notify the Ministry of Internal Affairs within three days to cancel the work permit.

I.4.1.2 Seasonal Employment

Work permit for a seasonal job is issued for a period of up to six months within a one-year timeframe.

In exceptional cases, if the season is longer, the work permit can be extended for two months but its validity cannot in any event exceed eight months within a one-year timeframe.

The employer is obliged to conclude an employment agreement with the foreigner and register them for mandatory social security within eight days of the issuance of the work permit for seasonal employment.

I.4.1.3 Contract for services

A person employed with a foreign company or having registered sole proprietorship abroad can

temporarily reside in Montenegro and provide services in Montenegro based on a contract concluded between the foreign company/sole proprietorship and the client in Montenegro.

Integrated permit on the basis of contract for services is issued for a period of up to one year and can be extended until the completion of the contracted services, but cannot beyond the maximum period of two years.

I.4.1.4 Intragroup secondment

A foreign company may temporarily assign its employee to work within its branch or subsidiary in Montenegro if the employee has been engaged with the foreign seconder in a managerial or specialist role for at least one year or as a trainee for at least three months, in the latter case provided the traineeship requires a college degree and the trainee is paid for their work.

Temporary residence and work permit on the basis of intragroup secondment is issued for a period of up to one year and can be extended for one additional year.

I.4.1.5 Entrepreneurs

Integrated permit can be obtained also on the basis of self-employed persons with one's own registered entrepreneurship (sole trader) in Montenegro. The permit is issued for a one-year period, with the possibility of unlimited extensions for as long as the conditions for temporary residence and work persist, provided the at least EUR 5,000 has been paid in taxes and social contributions in the previous year. This condition does not apply to the citizens of EU Member States and their family members (regardless of nationality), and to citizens of Iceland, Liechtenstein, Norway, and Switzerland.

I.4.2 Family reunion

A foreigner who is a close family member (spouse, same sex partner or a minor child) of a Montenegrin citizen or a foreigner in possession of integrated permit or temporary residence qualifies for temporary residence permit to stay in Montenegro.

Foreigner temporarily residing in Montenegro on the family reunion basis with another foreigner who has an integrated permit or a temporary residence permit may start working in Montenegro after the expiry of the first anniversary of their temporary residence status, without the need to obtain separate work permit. Foreigner residing in Montenegro on the basis of family reunion with a Montenegrin citizen may start working in Montenegro immediately after obtaining a temporary residence permit.

I.4.3 Digital nomads

As mentioned in Section I.3, digital nomad is a person providing online services to a company located outside of Montenegro. Digital nomad is eligible for temporary residence permit which can be issued for a period of up to two years and extended for additional two years. Digital nomad may apply for a new temporary residence permit after the expiry of six months after the previous one (whether extended or not) has expired.

I.5 Permanent residence

Permanent residence in Montenegro can be granted to a foreigner who has continuously resided in Montenegro for at least five years based on an approved integrated permit or temporary residence permit.

A foreigner is considered to have resided continuously in Montenegro even if they have been absent from Montenegro multiple times but not longer than ten months in total within a period of five years, or if they have been absent once for a continuous period of up to six months.

If a foreigner had previously been granted a temporary residence permit in Montenegro for the purpose of education or specialization, professional training, or practical training, only half of the time spent based on the approved temporary residence permit is counted towards the time required for the approval of permanent residence.

The applicant for permanent residence must demonstrate a working oral command of Montenegrin language.

II TAXATION OF INDIVIDUALS RELOCATING TO MONTENEGRO FOR WORK

Personal income tax regime depends on the type of income. In this publication, we address taxation of employment income, income from self-employment earned by registered entrepreneurs, income earned by digital nomads and dividend income.

II.1 Salary

II.1.1 Regular regime

Montenegrin employer must withhold salary tax from the tax base that is equal to grossed-up monthly salary comprising net salary, applicable social security contributions ("**SSC**") and applicable salary tax. Applicable tax rate depends on the amount of the base and amounts to: (i) 0% on the tax base up to EUR 700,00; (ii) 9% on the tax base which is between EUR 700.01 and EUR 1.000,00; and (iii) 15% on the tax base of 1,000.01 and above.

The employer must also withhold SSC from the base which cannot be below the minimum set in the General Collective Agreement for each category of qualifications.¹ The aggregate rate of SSC is 11% of gross salary (10.5% on the employee and 0.50% on the employer). As of 2025, the annual base for the application of SSC is capped at EUR 75,453.00 and the monthly base is capped at EUR 6,287.75.

REGULAR REGIME OF SALARY TAXATION

• Tax

Base: monthly gross base salary
Tax rate: 0% on the base up to EUR 700.00;
9% on the base between EUR 700.01 and EUR 1000.00;
15% on the base of 1000.01 and above

• Social security contributions (SSCs):

Base: monthly gross base salary
Annual cap on the base: EUR 75,453.00
Monthly cap on the base: EUR 6,287.75
Aggregate rate: 11%

¹ General Collective Agreement (*Opšti kolektivni ugovor*) ("Official Gazette of Montenegro" no. 150/22)

II.1.2 Incentives

Employer that commences business activity in one of the underdeveloped municipalities² is entitled to a tax incentive in the form of relief from the obligation to withhold and pay salary tax during the first 4 years of employment of each qualified employee. Qualified employee is a person employed for indefinite period of time or for a minimum of 5 years, who has domicile in the relevant underdeveloped municipality and has been registered as unemployed for more than three months prior to the employment. If the employment relationship with the qualified employee is terminated for any reason other than employee's breach, the employer must retroactively pay the salary tax³.

II.2 Income from self-employment

II.2.1 Business income

A foreigner who settles in Montenegro may register as sole entrepreneur to pursue a commercial activity ("Entrepreneur").

Entrepreneur's business income is subject to personal income tax levied on annual profit determined in the annual income statement (profit and loss account) as adjusted for tax purposes, at the rate of: (i) 0% on the tax base up to EUR 8,400.00; (ii) 9% on the tax base ranging between EUR 8,400.01 and EUR 12,000.00; and (iii) 15% on the tax base of EUR 12,000.01 and above.

Entrepreneur's business income is also subject to SSC at the aggregate rate of 11%. SCC base depends on the amount of annual turnover. Namely, SCC base is equal to to: (i) 60% of average monthly salary in Montenegro in the previous year as per official statistical data,⁴ for annual turnover up to EUR 9,000.00; (ii) 100% of the mentioned average for annual turnover up to EUR 15,000.00; or (iii) 150% of the mentioned average for annual turnover above EUR 15,000.00. Individual rates are as follows:

- pension and disability insurance (**PDI**) 10%;
- unemployment insurance 1%.

Entrepreneurs (with limited exceptions for certain trades) who commence business activity in one of underdeveloped municipalities⁵ are entitled to a tax holiday equal to 100% of personal income for the first 8 years of their operation, provided that, *inter alia*, the total amount of tax holiday for a period of eight years cannot exceed EUR 200,000.00 (including the amount of tax relief for newly employed persons in the same period, if any (see Section II.1.2).

II.2.2 Freelancing

Income generated by individuals from local legal entities from the sale of occasional services is subject to a withholding tax at the rate of 15% and SSCs payable on a withholding basis at the aggregate rate of 11%. Tax and SCC base is the gross income stipulated in the service agreement reduced by 30%.

² These include Cetinje, Bar, Danilovgrad, Nikšić, Žabljak, Zeta, Plužine, Pljevlja, Kolašin, Ulcinj, Mojkovac, Bijelo Polje, Šavnik, Tuzi, Berane, Andrijevica, Rožaje, Gusinje, Plav and Petnjica, according to the Rulebook on determining of the list of development degree of the local authorities units (*Pravilnik o utvrđivanju liste stepena razvijenosti jedinice lokalne samouprave*) ("Official Gazette of Montenegro" no. 151/2022 and 103/2023)

³ *Zakon o porezu na dohodak fizičkih lica* ("Official Gazette of the Republic of Montenegro nos. 65/2001, 12/2002, 37/2004, 29/2005, 78/2006, 4/2007 and "Official Gazette of Montenegro" nos. 86/2009, 40/2011, 14/2012, 6/2013, 62/2013, 60/2014, 79/2015, 83/2016, 67/2019, 59/2021, 146/2021, 152/2022, 88/2024, 133/2025, and 160/2025)

⁴ Average 2023 gross monthly salary in Montenegro was EUR 987.00

⁵ According to the Rulebook on determining of the list of the development degree of local municipalities (*Pravilnik o utvrđivanju liste stepena razvijenosti jedinice lokalne samouprave*) ("Official Gazette of Montenegro" nos. 151/2022 and 103/2023), these include Cetinje, Bar, Danilovgrad, Nikšić, Žabljak, Zeta, Plužine, Pljevlja, Kolašin, Ulcinj, Mojkovac, Bijelo Polje, Šavnik, Tuzi, Berane, Andrijevica, Rožaje, Gusinje, Plav and Petnjica.

When the services are provided to a foreign legal entity, the freelancer is obligated to report this income in their annual income tax return.

II.2.3 Lump-sum taxation

Entrepreneur may request from the competent tax authority a permission to be taxed under special lump-sum taxation regime if their annual income does not exceed EUR 30,000.00. Under this regime, tax and SSC are not calculated on the actual profit stated in the annual income statement, but on a notional deemed amount set by the Ministry of Finance and adjusted annually based on several criteria, such as predominant line of business, amount of the total achieved/planned income, ratio of business costs in relation to the total income, as well as the amount of the total taxable income.⁶ The amount of annual tax and SSC obligation is established by the tax authority and is payable in 12 equal monthly instalments.

Special lump-sum regime is not available to self-employed persons who engage in one of the following business activities: lawyer; notary; auditor; accounting; health industry; consulting; design; surveyor; public bailiff; other professions and occupations; hairdressing; billiard clubs; amusement games; retail and wholesale trade; hospitality and hotel management; financial intermediation; and real estate activities

SELF-EMPLOYMENT TAXATION REGIME 1 – BUSINESS INCOME

Business income tax rate: 0% on the profit of up to EUR 8,400.00;
9% on the annual profit of EUR 8,400.01 to EUR 12,000.00;
15% on the annual profit of 12,000.01 and above
SCC combined rate: 11%
SSC base: 60% of average monthly salary for annual turnover up to EUR 9,000.00
100% of average monthly salary for annual turnover up to EUR 15,000.00
150% of average monthly salary for annual turnover above EUR 15,000.00

SELF-EMPLOYMENT TAXATION REGIME 2 – FREELANCING

Tax and SCC base: gross income reduced by 30%
Tax rate: 15%
SCC combined rate: 11%

SELF-EMPLOYMENT TAXATION REGIME 3 – LUMP-SUM TAXATION

- Tax and SSC base: deemed annual income determined by the tax authority (maximum EUR 30,000.00)
- Tax and SSC: annual amount determined by the tax authority, payable in monthly instalments.

⁶ The Rulebook on lump-sum taxation of income from self-employment (*Pravilnik o paušalnom oporezivanju prihoda od samostalne djelatnosti*) („Official Gazette of the Republic of Montenegro" no. 003/05 and „Official Gazette of Montenegro" no. 080/08, 018/12, 012/14, 018/14, 025/16, 008/22 and 118/24)

II.3 Digital nomads

An individual who earns income from an overseas employer as a digital nomad (see Section I.4.3) is not subject to income tax and SCC in Montenegro on that income.

II.4 Dividends

Corporate income tax rate in Montenegro is applied progressively. For taxable income up to EUR 100,000.00, the tax rate is 9%. Taxable income ranging between EUR 100,000.01 and EUR 1,500,000.00 is taxed at the rate of 12%, whereas taxable income higher than EUR 1,500,000.01 is taxed at the rate of 15%. Taxable income is determined in the income statement subject to adjustments pursuant to the Corporate Income Tax Act.

A company which is a tax resident of Montenegro must withhold and pay dividend tax at the rate of 15% when disbursing the dividend to a resident or non-resident legal entity. Exceptionally, tax rate of 30% applies when disbursing the dividend to a non-resident legal entity that is domiciled at one of specified tax havens. However, if the legal entity is both a tax resident of a tax heaven and a country with which Montenegro has signed a Double Taxation Treaty (DTT), the tax rate of 15% applies.

Dividend disbursed to an individual, whether such individual is Montenegrin resident or not, is taxed at the rate of 15%.

II.5 Tax residence in Montenegro and taxation of non-residents

II.5.1 Tax residence

Tax residence means that an individual has strong ties with a certain country over a certain period of time, which allows that country to tax such individual's global income ("worldwide taxation"). Generally, an individual becomes Montenegrin tax resident in a given fiscal year if they acquire domicile in Montenegro or Montenegro becomes their center of vital and business interests in the course of that year, or if they spend in Montenegro more than 183 days in that tax year (which is the same as calendar year).

Double taxation may arise when both Montenegro and some other country regard the same individual as its tax resident. This can happen e.g. if a national of one country relocates to Montenegro but retains a domicile in the other country. In that case, Montenegro can claim that the individual as its tax resident because it has domicile, or has spent more than 183 days within that year, in Montenegro. The other country can claim the individual as its tax resident, because of formal domicile. Such conflicts are resolved by the application of Double Taxation Treaty in place between Montenegro and the individual's home country, if such exists. In most of Montenegro's Double Taxation Treaties, an individual who has domicile in both countries is deemed tax resident of the country which is the center of the individual's vital interests because of the personal and economic ties to that country.

A foreigner can get Montenegrin Tax Residency Certificate if they meet criteria listed in the previous paragraphs. The Request for obtaining the Certificate should be submitted to the Tax Authorities with (inter alia) one of the following documents (originals or notarized copies are required): (i) passport; (ii) temporary residence permit for stay in Montenegro granted for a period longer than 6 months; (iii) valid employment agreement with a Montenegro-based employer or agreement or other document proving that the employee is seconded to work in Montenegro.

To eliminate or mitigate international double taxation of its tax residents, Montenegrin national tax law recognizes "foreign tax credit": if Montenegrin tax resident earns a particular income abroad which was taxed at source (directly from the tax resident or withheld by the payer of income), that income can be used as a deduction of Montenegrin tax liability (under the "worldwide taxation" principle). The amount of the foreign tax paid on such income can be deducted from the amount of the Montenegrin tax liability up to the amount of tax that would have been calculated on that income under Montenegrin tax rules. National rules on "foreign tax credit" apply regardless of whether there is a double taxation treaty in place between Montenegro and the source country.

II.5.1.1 Taxation of non-resident's employment income

Montenegro has the right to tax Montenegrin-sourced employment income earned by non-residents. Income from work performed in Montenegro is deemed to have its source in Montenegro regardless of where the income is paid. However, pursuant to its Double Taxation Treaties, Montenegro will not have the right to tax non-residents' income from the work performed in Montenegro if the following three conditions are met cumulatively:

- (i) the employee has not spent more than 183 days in any 12-month period (or in a calendar year, depending on the DTT) in Montenegro; and
- (ii) the employment income is paid by an employer which is not a tax resident of Montenegro; and
- (iii) the cost of the employee's salary is not borne by the employer's permanent establishment in Montenegro.

II.5.1.2 Taxation of non-resident's income from professional services and other independent personal services

Professional services and other independent personal services are services provided in the context of independent professions such as lawyers, physicians, dentists, architects, engineers, accountants, business consultants, teachers, writers, scientists, personally and not through an entity, irrespective of whether the individual is registered as Entrepreneur or not. Foreigner who provides such service in or from Montenegro for a short period of time is not likely to become a tax resident of Montenegro on that basis. Nevertheless, Montenegro has the right to tax such income to the extent the income can be attributed to a "fixed base" that the individual maintains on the Montenegrin territory. "Fixed base" is a place such as office, hotel room, apartment, meeting room or alike which is available to the individual for use on a regular basis for the purpose of providing the service. Most of Montenegro's double taxation treaties require that such "fixed base" is maintained for a period of at least 6 months within a 12-month period.

When Montenegro has the right to tax income earned by non-residents providing professional services or other independent personal services in or from Montenegro, the tax base is equal to gross income sourced in Montenegro, and calculation of tax and SSC is conducted in the same manner as described in sections "II.1 – Salary" and "II.2 – Income from self-employment", depending on the specific source of income. Non-resident that generates income that is not subject to withheld taxation has the obligation to file annual tax return for the income generated in Montenegro.

II.5.2 Double Totalization Agreements

Double Totalization Agreements (DTA) ensure coordinated application of national social security laws of the treaty countries, to individuals who are subject to such laws and who relocate from one treaty country to another for the purpose of employment or provision of professional or other independent personal services. In particular, DTA contains rules on the applicability of national social security laws to certain cross-border workforce mobility situations.

The basic principle is that social security laws of the country in which employment is constituted, or professional or other independent personal services provided, apply to the individual in question. However, a number of treaties have an exception for seconded employees (i.e. employees employed in a foreign country and sent by their foreign employer to work in Montenegro for a certain limited time) and individuals who carry out professional and other independent personal services. The exception ensures that the social security laws of the foreigner's home country remain applicable to the foreigner for a certain period of time after their relocation to Montenegro (most commonly for the first 24 months in case of seconded employees and first 12 months in case of professional and other independent personal services providers). Under most of the treaties, this period can be extended in case of unforeseen circumstances, subject to the consent of the relevant Montenegrin authorities. This practically means that during the exempted period, no SSC are payable in Montenegro on Montenegrin-sourced income of such individuals. However, for this purpose a Certificate of Coverage (COC, or A1 form for the member countries of European Union) must be obtained from the authorities in the country from which the employees are seconded.

Furthermore, DTA prescribes the right to add the insurance periods in treaty countries when applying for retirement.

II.5.2.1 Montenegro Double Taxation Treaties and Double Totalization Agreements

As of January 2026, Montenegro has Double Taxation Treaties with the following 51 countries:

Albania	Latvia
Andora	Luxembourg
Austria	Macedonia
Azerbaijan	Malta
Belgium	Moldova
Belarus	Malaysia
Bosnia and Herzegovina	Monaco
Bulgaria	Netherlands
China	Norway
Croatia	Philippines
Cyprus	Cyprus Poland
Czech Republic	Portugal
Denmark	Romania
Egypt	Russian Federation
Finland	Serbia
France	Slovakia
Germany	Slovenia
Ghana	Sri Lanka
Greece	Sweden
Guinea	Switzerland
Hungary	Turkey
Italy	UAE
Iran	UK
Ireland	Ukraine
Korea (DPR)	Zimbabwe
Kuwait	Kuwait

As of January 2026, Montenegro has Double Totalization Agreements with the following 26 countries:

Austria	Hungary
Belgium	Northern Macedonia
Bosnia and Herzegovina	Netherlands
Bulgaria	Norway
Croatia	Panama
Czech Republic	Poland
Danmark	Romania
Egypt	Serbia
France Slovak	Slovak Republic
Germany	Slovenia
Italy	Sweden
Libya	Switzerland
Luxembourg	UK