HNB

EUROSYSTEM

Decision on supervision fees for issuers of asset-referenced tokens and e-money tokens

November 2025

CROATIAN NATIONAL BANK

EUROSYSTEM

Pursuant to Article 54, paragraph (2) of the Act Implementing Regulation (EU) 2023/1114 on Markets in Crypto-Assets (Official Gazette 85/2024) and Article 43, paragraph (2), item (10) of the Act on the Croatian National Bank (Official Gazette 75/2008, 54/2013 and 47/2020), the Governor of the Croatian National Bank hereby issues the

Decision on supervision fees for issuers of asset-referenced tokens and e-money tokens

I GENERAL PROVISIONS

Subject matter and scope of the Decision
Article 1

(1) This Decision regulates the amount, the method of calculating and the method of paying fees charged to issuers of asset-referenced tokens and e-money tokens for the supervision exercised by the Croatian National Bank pursuant to the Act Implementing Regulation (EU) 2023/1114 on Markets in Crypto-Assets (Official Gazette 85/2024, hereinafter referred to as the 'Act') and Regulation (EU) 2023/1114 of the European Parliament and of the Council of 31 May 2023 on markets in crypto-assets, and amending Regulations (EU) No 1093/2010 and (EU) No 1095/2010 and Directives 2013/36/EU and (EU) 2019/1937 (Text with EEA relevance) (OJ L 150, 9.6.2023, hereinafter referred to as 'Regulation (EU) 2023/1114').

(2) The provisions of this Decision shall be applicable to credit institutions issuing asset-referenced tokens and e-money tokens for which the Republic of Croatia is the home Member State, electronic money institutions issuing e-money tokens for which the Republic of Croatia is the home Member State, and other legal persons issuing asset-referenced tokens (including electronic money institutions issuing asset-referenced tokens) that have been authorised by the Croatian National Bank in accordance with Title III of Regulation (EU) 2023/1114.

(3) The amount of supervision fees for credit institutions issuing asset-referenced tokens and other legal persons issuing asset-referenced tokens shall be calculated in accordance with Title II of this Decision. The amount of supervision fees for credit institutions issuing e-money tokens and electronic money institutions issuing e-money tokens shall be calculated in accordance with Title III of this Decision.

(4) If a credit institution or an electronic money institution issues asset-referenced tokens and e-money tokens, a supervision fee for that institution as an issuer of asset-referenced tokens shall be calculated in accordance with Title II of this Decision, while a supervision fee for that institution as an issuer of e-money tokens shall be calculated in accordance with Title III of this Decision.

(5) Entities liable for payment of the fee referred to in this Decision in the calculation year shall be the fee-paying entities in business on 31 December of the reference year.

Definitions
Article 2

For the purposes of this Title of the Decision, the following terms shall have the following meaning:

1) ‘*reference year*’ means the business year in which the Croatian National Bank exercised the supervision referred to in the Act;
2) ‘*calculation year*’ means the year following the reference year in which the Croatian National Bank shall calculate and collect the fee for the supervision exercised in the reference year.

II SUPERVISION FEES FOR ISSUERS OF ASSET-REFERENCED TOKENS

Supervision fees for issuers of asset-referenced tokens
Article 3

(1) A supervision fee for issuers of asset-referenced tokens shall amount to EUR 2,500.00 for each issuer of asset-referenced tokens, regardless of the number and size of such issues.

(2) The fee referred to in paragraph (1) of this Article shall be paid every year.

(3) An entity liable for payment of the fee referred to in paragraph (1) of this Article shall be each issuer of asset-referenced tokens referred to in Article 1, paragraph (2) of this Decision in business on 31 December of the reference year.

III SUPERVISION FEES FOR ISSUERS OF E-MONEY TOKENS

Supervision fees for issuers of e-money tokens
Article 4

(1) A supervision fee for issuers of e-money tokens shall amount to EUR 2,500.00 for each issuer of e-money tokens, regardless of the number and size of such issues.

(2) The fee referred to in paragraph (1) of this Article shall be paid every year.

(3) An entity liable for payment of the fee referred to in paragraph (1) of this Article shall be each issuer of e-money tokens referred to in Article 1, paragraph (2) of this Decision in business on 31 December of the reference year.

IV TIME LIMIT FOR AND THE METHOD OF PAYING SUPERVISION FEES

Method of paying
Article 5

(1) The fees referred to in Titles II and III of this Decision shall be the income of the Croatian National Bank and shall be credited to the business account of the Croatian National Bank: HR6210010051011111116.

(2) The Croatian National Bank shall, by 15 February of the calculation year, submit to the entity liable for payment of the fee referred to in Titles II and III of this Decision an invoice based on which the fee-paying entity is obligated to pay the supervision fee.

(3) In the invoice referred to in paragraph (2) of this Article, the Croatian National Bank shall separately indicate the amount related to the supervision fee for the issuer of asset-referenced tokens and the amount related to the supervision fee for the issuer of e-money tokens.

Time limit for payment
Article 6

(1) Based on the invoice referred to in Article 5 of this Decision, fee-paying entities shall pay the supervision fee as a yearly lump sum by 15 March of the calculation year.

(2) Where the fee-paying entity fails to fully meet its obligations within the time limit referred to in paragraph (1) of this Article, the Croatian National Bank shall charge default interest in accordance with the law governing civil obligations.

V TRANSITIONAL AND FINAL PROVISIONS

Transitional provisions
Article 7

The first reference year for the payment of fees in accordance with this Decision shall be 2025.

Entry into force
Article 8

This Decision shall be published in the Official Gazette and shall enter into force on the eighth day after the day of its publication.

No.: 398-091/11-25/BV
Zagreb, 10 November 2025

Boris Vujčić

Governor