



National Bank of Serbia

INSURANCE SUPERVISION DEPARTMENT  
PENSION FUNDS  
SUPERVISION DIVISION

# **VOLUNTARY PENSION FUNDS SECTOR IN SERBIA**

**Third Quarter Report 2025**

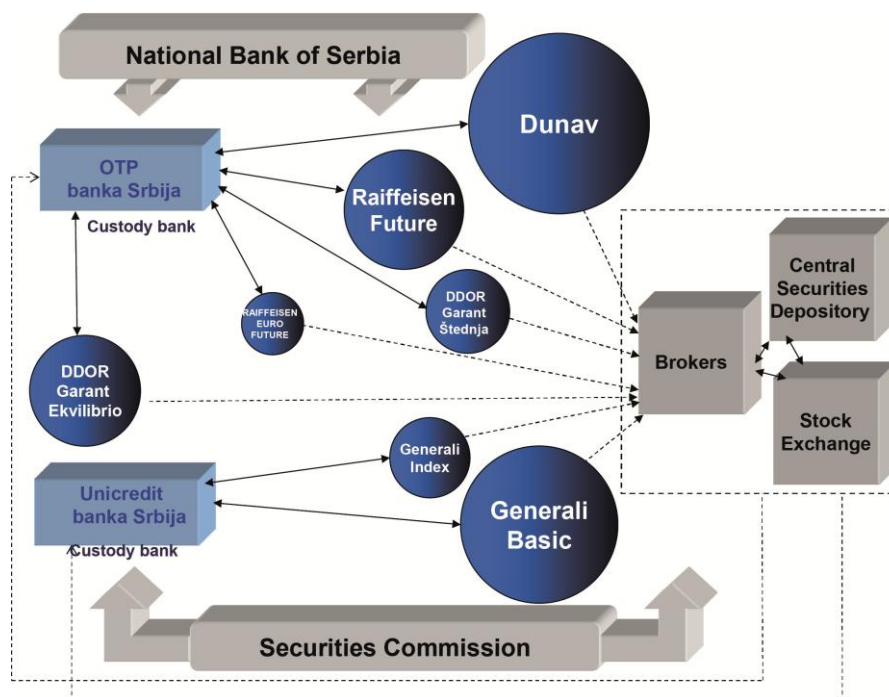
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## 1 VPF market participants

At end-Q3 2025, the market of voluntary pension funds (VPFs) included four companies managing seven VPFs, two custody banks, five intermediary banks and one insurance brokerage undertaking.<sup>1</sup>

Diagram: VPF market participants



At end-Q3 2025, VPF management companies employed 139 persons, three persons more than at end-Q2 2025.

The NBS licenses sales agents, who passed professional examinations and fulfilled other requirements, to disseminate information about VPF operation, as well as to distribute prospectuses (sales agents). During Q3 2025, there were 34 new sales agent licences issued, therefore the total number is now 1,207.<sup>2</sup>

As brokers – management companies, banks and insurance undertakings may hire sales agents. At end-Q3 2025, management companies hired 104 persons, intermediary banks 651, and the insurance undertaking 83 persons as sales agents.

<sup>1</sup> Raiffeisen Bank a.d. Beograd, OTP banka Srbija a.d. Novi Sad, NLB Komercijalna banka a.d. Beograd, Addiko Bank a.d. Beograd and AIK Banka a.d. Beograd, as well as the joint-stock insurance undertaking DDOR Novi Sad, Novi Sad.

<sup>2</sup> The licensing exam for disseminating information about VPF operation and the distribution of prospectuses is organised twice a year, usually in May and December.

## 2. Net VPF assets

VPF net assets at end-Q3 2025 came at RSD 65.2 bn, up by 2.8% relative to a quarter before. The change in the value of net assets reflects net contributions,<sup>3</sup> withdrawals and investment returns. In Q3 2025, total net contributions amounted to RSD 1.4 bn, and withdrawals by members who met legal requirements to RSD 752.8 mn.

*At end-Q3 2025, VPF net assets equalled RSD 65.2 bn.*

### End-of-period net assets of the VPF sector

(in RSD bn)

2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025		
										Q1	Q2	Q3
28.9	32.8	36.2	40.2	45.2	47.0	49.1	48.2	53.8	61.7	61.8	63.4	65.2

Source: National Bank of Serbia.

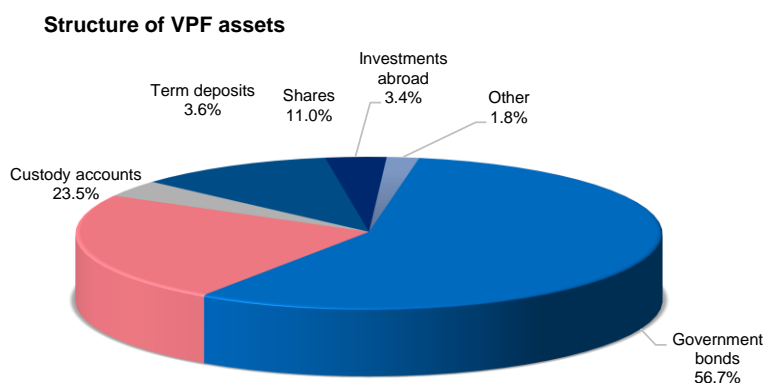
Measured by HHI, market concentration in the sector<sup>4</sup> at end-Q3 2025 amounted to 2,743 points, indicating the persisting high concentration in the VPF market.

According to the size of VPF net assets relative to total net assets of the sector, three largest funds together account for 81%, and the largest fund for 41% of the market share.

## 3. Structure of VPF assets

At end-Q3 2025, the structure of investment of VPF assets changed negligibly from the previous period. Government bonds accounted for the bulk of VPF assets – 56.7%, balances in custody accounts made up 23.5%, shares of domestic legal persons 11%, time deposits with banks 3.6%, and investments abroad 3.4% of total VPF assets.<sup>5</sup>

*The majority of funds were invested in bonds of the Republic of Serbia – 56.7%.*



Source: National Bank of Serbia.

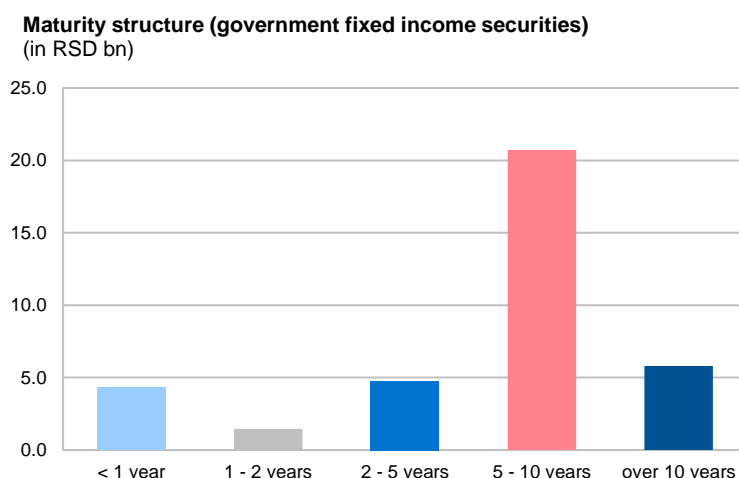
The portfolio of government debt instruments (Republic of Serbia's bonds) kept the dominant position in total VPF assets at the end of this period as well, its share edging down from 61.6% at end-

<sup>3</sup> Net contributions are total contributions minus the front-load fee.

<sup>4</sup> In terms of the share of VPF net assets in total net assets.

<sup>5</sup> The remaining assets are invested in open-ended investment fund units, receivables and corporate bonds.

Q2, to 56.7%. In the composition of government securities, bonds in the domestic currency accounted for 65.6%, those in euros for 33.8% and those in US dollars for 0.6%.



Source: National Bank of Serbia.

The maturity composition of the portfolio of government debt securities changed negligibly from end-Q2. At end-Q3 2025, 11.6% of government debt securities were with the maturity of up to one year, 3.9% between one and two years, 12.8% between two and five years, 56.0% between five and ten years, and 15.7% over ten years.

The average maturity of assets<sup>6</sup> invested in government bonds was 6.6 years at end-Q3 2025 (the same as at end-Q2).

Aggregate exposure to shares of domestic legal persons measured 11% of total VPF assets and declined slightly from the previous period (11.2%).

In Q3 2025, investments abroad accounted for 3.4% of VPF assets (3.1% at end-Q2).

Relative to the prior period, currency composition of total assets changed mildly due to the higher share of dinar and euro instruments in total assets, as shown below.

**Currency structure of VPFs**  
(in %)

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025		
											Q1	Q2	Q3
RSD	87%	87%	86%	87%	87%	86%	86%	85%	78%	71%	70%	64%	67%
EUR	13%	13%	13%	12%	13%	14%	14%	15%	22%	15%	14%	20%	25%
USD	-	-	1%	1%	-	-	-	-	-	14%	16%	16%	8%

Source: National Bank of Serbia.

## 4. Return on investment

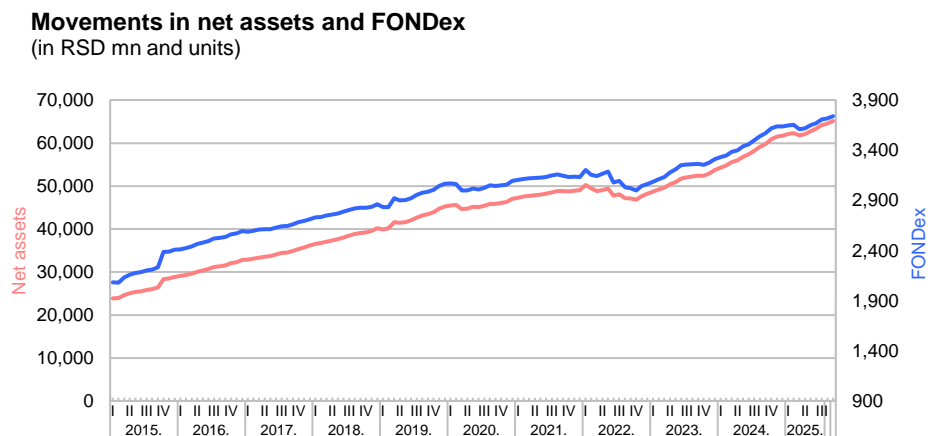
At end-Q3 2025, the FONDex<sup>7</sup> reached 3,741.10 points<sup>8</sup> (3,669.97 at end-Q2). FONDex return, the weighted average return on all funds equalled 4.8% over the past year and 4.2% over the past five years. Since the start of VPF operation, FONDex return has equalled 7.2%.

<sup>6</sup> The maturity of instruments weighted by their share in total investment in government debt instruments.

<sup>7</sup> FONDex is the index which indicates movements in investment units of all VPFs in the market.

<sup>8</sup> The initial FONDex value on the first business day of the first VPF, 15 November 2006, was 1,000.

Given the structure of VPF investment, the return is influenced by: the change in the value of government debt instruments,<sup>9</sup> change in the prices of shares, change in the value of investment units of open investment funds, level of the key policy rate, banks' interest rates, and changes in the dinar exchange rate against the euro.



## 5. Fees charged by management companies

The Law on Voluntary Pension Funds and Pension Schemes sets out that management companies charge two types of fees: fee for services rendered by the management companies and fee for the transfer of a fund member's account, subject to their tariff code. Management company fees entail contribution and management fees.

The contribution fee is paid as a percentage of each executed payment as a front-load fee. In Q3 2025, this fee averaged 2.18% (2.17% in the quarter before). The total amount of contribution fees paid in Q3 2025 came at RSD 30.2 mn, or 13% of total fees charged.

The management fee is calculated daily against the value of net VPF assets, not exceeding 1.25% p.a. and is included directly in the investment unit value, meaning that the calculated and published investment unit value is exclusive of the management fee. In Q3 2025, the total value of management fees equalled RSD 200.6 mn, which is 87% of the total fees charged.

**Fees charged by management companies**  
(in RSD mn)

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025		
											Q1	Q2	Q3
Contribution fee	53.0	56.8	61.0	66.3	71.8	76.2	80.9	85.1	94.5	111.4	28.4	30.0	30.2
Management fee	514.9	614.4	678.7	474.0	526.7	567.9	599.4	599.0	633.4	715.7	189.4	192.7	200.6

Source: National Bank of Serbia.

<sup>9</sup> A decline in interest rate leads to an increase in the prices of debt instruments and vice versa. The prices of longer-maturity instruments are more sensitive to interest rate changes.

## 6. Volume of securities trading and transaction costs

In Q3 2025, the volume of VPF trading in securities came at RSD 20.9 bn and the average share of VPFs in the Belgrade Stock Exchange trading in the same period was 8%.

### VPF securities trading

(in RSD bn)

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025		
											Q1	Q2	Q3
Securities trading	14.5	11.5	24.2	16.1	48.7	26.3	33.5	11.9	27.9	58.9	14.8	14.9	20.9
Purchases	7.9	6.4	14.7	9.3	27.1	13.8	18.6	6.0	14.0	30.3	9.7	6.3	8.8
Belgrade Stock Exchange	0.9	1.1	3.7	2.7	3.2	2.7	1.9	1.6	0.6	1.9	-	0.3	0.1
Unregulated market	1.8	1.1	5.8	3.2	16.7	7.6	13.7	2.3	7.5	15.0	1.1	5.0	2.9
Foreign markets	-	-	-	-	-	-	-	-	-	5.8	5.0	1.0	0.9
Auctions of government securities	5.2	4.2	5.1	3.4	7.1	3.6	3.0	2.1	5.9	7.6	3.5	-	4.9
Sales	3.6	3.0	7.4	5.5	19.6	11.2	12.0	3.8	11.5	25.6	4.3	8.4	10.7
Belgrade Stock Exchange	0.5	1.9	2.7	3.2	1.4	3.1	3.7	0.8	1.1	7.7	1.0	1.2	0.4
Unregulated market	3.2	1.1	4.7	2.3	18.1	8.1	8.3	3.0	10.3	14.5	0.3	5.1	9.5
Foreign markets	-	-	-	-	-	-	-	-	-	3.4	3.0	2.1	0.7
Maturity	2.9	2.1	2.2	1.3	2.1	1.4	3.0	2.1	2.4	3.1	0.7	0.2	1.4
Purchase to sale and maturity ratio	1.2	7.5	1.5	1.4	1.3	1.1	1.2	1.0	1.0	1.1	1.9	0.7	0.7
Share in total BSE trading (in%)	6.1%	6.7%	33.0%	9.4%	5.1%	11.9%	13.5%	6.1%	8.5%	26.3%	38.7%	41.4%	7.6%

Sources: National Bank of Serbia, Belgrade Stock Exchange.

Transaction costs incurred in the purchase, sale and transfer of securities (Central Securities Depository fees, stock exchange fees, tax charges) and the costs of current maintenance of real estate property that fund assets are invested in are charged against fund assets. Other costs are charged against the assets of management companies.

### Amount of transaction costs

(in RSD mn)

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025		
											Q1	Q2	Q3
Total	5.6	7.3	10.5	8.3	17.2	10.3	4.8	5.9	6.2	19.2	6.5	2.9	1.8
Brokerage fees	1.3	2.3	4.4	3.0	8.0	3.7	0.7	1.0	1.5	11.0	4.2	1.5	0.6
Custody bank fees	2.0	2.0	1.9	1.8	3.1	2.3	1.6	1.4	2.4	3.3	0.5	0.7	0.6
Stock exchange fees	0.8	1.0	1.8	1.3	1.9	1.3	0.5	0.6	0.7	2.9	1.2	0.6	0.2
Central Securities Depository fees	1.6	2.0	1.8	1.6	3.4	2.2	1.7	2.8	1.7	2.0	0.5	0.2	0.4
Other fees	-	-	0.6	0.6	0.7	0.9	-	-	-	-	-	-	-

Source: National Bank of Serbia.

The total transaction costs in Q3 2025 amounted to RSD 1.8 mn, with stock exchange fees and custody bank fees accounting for the largest shares.

## 7. Number and structure of VPF users

At end-Q3 2025, 228,296 users<sup>10</sup> were in the accumulation phase<sup>11</sup> (an increase by 702 from end-Q2), with 315,749 membership contracts<sup>12</sup> (944 contracts more than at end-Q2).

VPF users make up 9.8% of the total number of employees in the Republic of Serbia.<sup>13</sup>

### Number of contracts and users

(in thousand)

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025		
											Q1	Q2	Q3
No of contracts	258.1	250.5	253.9	261.7	275.8	279.5	288.7	294.5	304.8	312.2	313.0	314.8	315.7
No of users	190.5	183.6	185.4	192.3	201.6	205.0	210.7	215.5	220.7	225.7	226.1	227.6	228.3
Percentage of active users (in %)	25.3%	28.5%	33.6%	33.4%	34.4%	35.3%	35.9%	36.5%	36.1%	36.8%	35.2%	35.1%	35.3%

Source: National Bank of Serbia.

The amount of accumulated funds depends on the amount of contributions, return earned by funds, level of fees and costs, and the length of the accumulation phase. As the level of contributions and the period of accumulation increase, and funds earn returns, average balances in members' individual accounts go up. The average amount of funds accumulated in the accounts of members who have made at least one contribution payment was RSD 315,900 at end-Q3 2025.

### Average accumulated funds at end-period

2015	2016	2017	2018.0	2019	2020	2021	2022	2023	2024	2025		
										Q1	Q2	Q3
179.4	200.6	219.3	235.8	239.9	257.4	260.0	249.6	271.7	304.5	303.3	308.1	315.9

Source: National Bank of Serbia.

At end-Q3 2025, the number of users who are members of two or more VPFs was 46,099 or 20.2% of the total number of users. The structure of users by sex and the amount of their funds did not change significantly compared to prior periods. Men made up the majority of 55%.

<sup>10</sup> VPF membership has two phases – the accumulation phase (when contributions are made) and the withdrawal phase (when the accumulated funds are withdrawn).

<sup>11</sup> The number of users is the number of people who are members of VPF(s). This number is lower than the number of membership contracts, as there is a significant number of users with more than one membership contract in one or several VPFs.

<sup>12</sup> The number of membership contracts is the sum total of individual membership contracts and the number of members of all pension schemes.

<sup>13</sup> Source for the number of employees: NBS.



**Number of users by number of funds in which they are members**  
(in units)

No of funds	No of users
1	182,197
2	39,988
3	5,746
4	335
5	22
6	6
7	2
Total	228,296

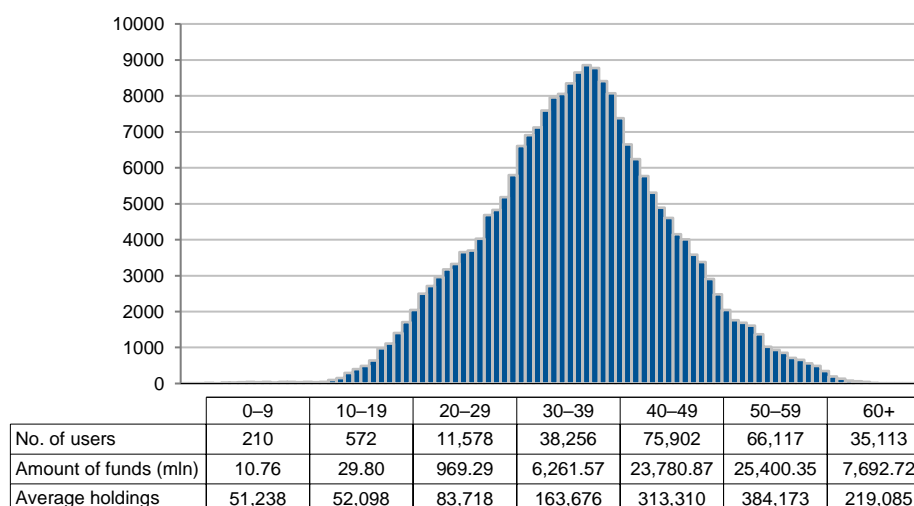
Source: National Bank of Serbia.

**Number of users by membership contract**  
(in units)

No of contracts	No of users
1	163.263
2	50.527
3	9.419
4	3.311
5	1.151
6	349
7	194
8	43
9	20
10	9
11	10
Total	228.296

Source: National Bank of Serbia.

**Distribution of users and accumulated funds by age**  
(in units, RSD)



Source: National Bank of Serbia.

At end-Q3 2025, the average age of VPF users was around 48 years (the same as at end-Q2 2025), with users aged 40–60 making up the dominant share (62.4%). Also, the percentage of users above the age of 53 was similar as in prior years (33.4%), while the percentage of users above 58 was 19.6%.

## 8. Contributions, withdrawals and transfers

Net contributions to VPFs (total contributions minus the front-load fee) came at RSD 1.35 bn in Q3 2025.

*In Q3 2025, net contributions amounted to RSD 1.35 bn.*

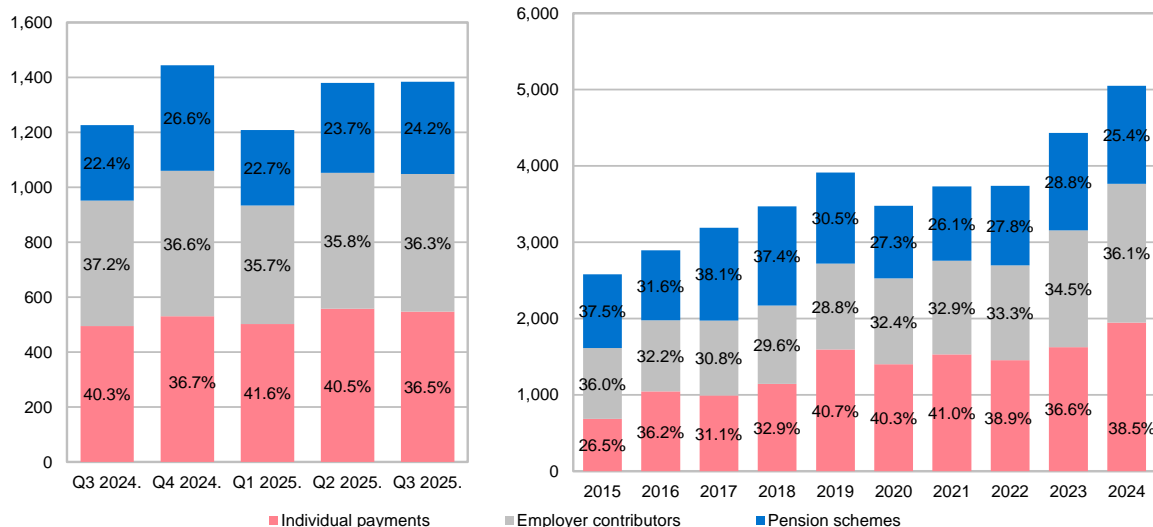
**Total contributions**  
(in RSD bn)

2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025		
										Q1	Q2	Q3
2.58	2.89	3.19	3.47	3.92	3.48	3.73	3.74	4.43	5.05	1.21	1.38	1.38

Source: National Bank of Serbia.

Of total contributions in Q3 2025, individual payments accounted for 39.5%, employer contributions for 36.3% and pension schemes for 24.2%.

#### Volume and structure of total contributions (in RSD mn, %)



Source: National Bank of Serbia.

In the observed quarter, there was a decrease in the share of individual payments and an increase in the share of employer contributions to VPFs for the account of their employees and pension scheme contributions. This way, employees and employers can save up since contributions from employer's funds up to RSD 8,449<sup>14</sup> per employee per month are exempt from the household income tax and contributions for mandatory social insurance. Payments in the same amount made by the employer through wage garnishment are also tax-exempt. This represents an additional incentive to employees and employers to direct a part of the wage to saving in VPFs.

In Q3 2025, total withdrawals by members who met legal requirements amounted to RSD 752.8 mn.

*In Q3 2025, total withdrawals amounted to RSD 752.8 mn.*

#### Total withdrawals (in RSD mn)

2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025		
										Q1	Q2	Q3
1,226.2	1,195.6	1,342.4	1,412.0	1,679.8	2,159.6	2,223.5	3,530.1	2,685.6	2,386.5	675.3	801.9	752.8

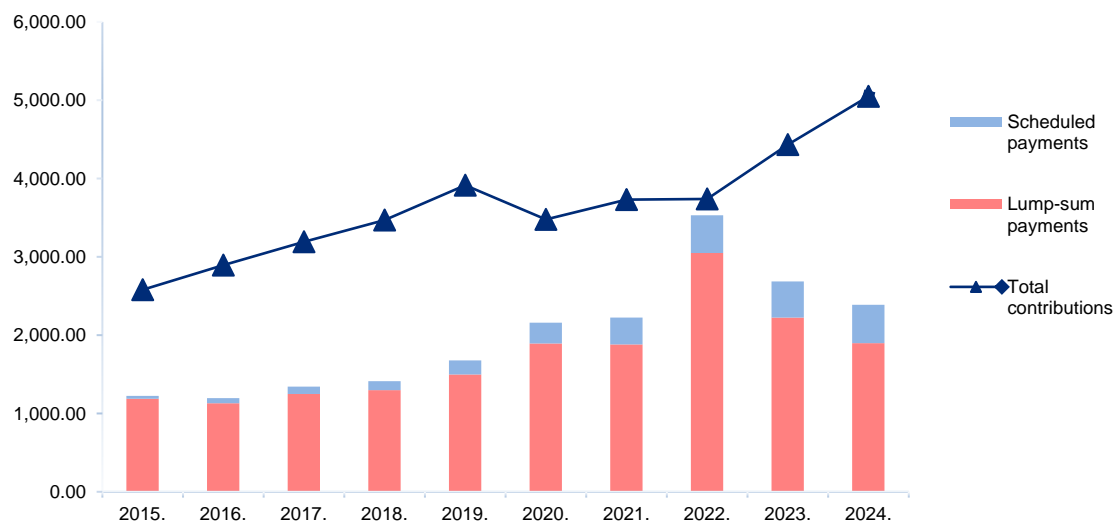
Source: National Bank of Serbia.

Lump sum withdrawals accounted for 80% of withdrawals and scheduled withdrawals for 20%. As the accumulation period extends and account balances grow, we may expect a rising share of scheduled withdrawals and other types of withdrawals envisaged by the law (e.g. purchase of annuities).

<sup>14</sup> Under the Government decree, this amount is adjusted for previous-year inflation once a year. Since February 2025 it equals RSD 8,449.

## Comparative Annual Review of Withdrawals and Contributions

(in RSD mn)



Source: National Bank of Serbia.

Transfers represent inter-fund transfers. A member may transfer a part or all of his assets from one fund to another, paying only the actual transfer costs to the custody bank. In Q3 2025, the total amount of assets transferred to another fund equalled RSD 63.2 mn.

*In Q3 2025, the transfers came at RSD 63.2 mn.*

### Total inter-fund transfers

(in RSD mn)

2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025		
										Q1	Q2	Q3
219.7	267.5	263.0	229.7	210.3	252.6	199.0	748.4	260.0	328.5	100.1	61.4	63.2

Source: National Bank of Serbia.