

The purpose of this thesis is an analysis of changes in Czech substantive private law resulting from the New Civil Code no. 89/2012 Coll, and the Act on Business Corporations no. 90/2012 Coll., with an impact on tax law as a part of finance law, in particular on regulation of income taxes.

The thesis comprises of three parts. In the first one, terminological and material changes contained within the recodification which require amendment of tax legislative are introduced – new terminology of the new private law regulation, new legal institutes and changes in current institutes (e.g. public-benefit persons, extensive notion of a thing or trusts as a separate ownership without legal personality).

The second part of the thesis analyses the governmental draft of the Act on Amendment of Tax Legislative in Relation to Recodification of Private Law and on Amendment of Certain Acts and reflection of the recodification in Act no. 586/1992 Coll., on Income Taxes as amended. Institute of public-benefit taxpayers or taxation of income arising in respect of inheritance are examined among other changes. Other amendments not directly related to the recodification (e.g. integration of inheritance and gift taxes or exemption of shares in profit of business corporation from taxation) are also briefly mentioned.

Finally, the third part of the thesis contains a comprehensive analysis of a trust's (in Czech “svěřenský fond”) status as a taxpayer of the Czech income tax (tax personality of a trust, income subject to taxation and tax base, tax administration, specifics of public-benefit and investment trusts etc.). Other aspects related to taxation of trusts are also discussed – taxation of income of a settlor, a beneficiary and a trustee and trust as a taxpayer of other taxes of the Czech tax system. This part is supplemented with a simple example on taxation of trust's income and income of persons benefiting from a trust.

The thesis also includes criticism of certain proposed changes and considerations *de lege ferenda*.