



Tax Agenda Greece

January 2026



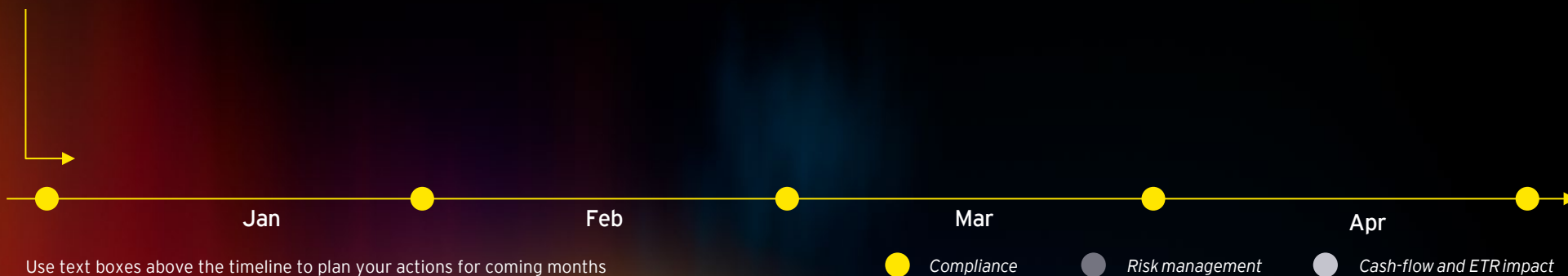
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No.	Fact	Action
1	<p>Changes to the double-tax treaty (DTT) framework of Greece</p> <p>Following the temporary termination of the Greece-United Arab Emirates DTT on 18 December 2024, the Ministry of Foreign Affairs has confirmed, via the Exchanges of Notes dated 2 May 2025, that the DTT and its Protocol shall continue to apply retroactively and without time limitation. The reinstatement of the DTT has been ratified by Law 5228/2025 which secures the uninterrupted application of the DTT's provisions.</p> <p>Also, Greece and Vietnam are in on-going discussions for the conclusion of a DTT.</p>	<p>Review your local group presence in order to assess whether there is any potential impact arising from the new DTT framework.</p> <p>● ●</p>
2	<p>Changes to the Greek Family Office regime</p> <p>Law 5222/2025 introduces notable updates to the Greek Family Office regime. The minimum annual operating cost threshold is lowered to €500,000 (from €1,000,000). The permitted activities of Family Offices are also expanded to include advisory services to trustees of trusts involving individuals or related family members as settlors or beneficiaries.</p> <p>Furthermore, it is also explicitly clarified that service provision to foreign affiliated companies does not create effective management in Greece.</p>	<p>Review your local group presence in order to assess whether there is any potential impact arising from the new framework.</p> <p>● ● ●</p>



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3	<p>Changes to the imposition of the duty in favor of the Greek Competition Commission to share capital increases</p> <p>Law 5255/2025 amended the framework to explicitly impose the 1‰ duty in favor of the Competition Commission on the initial share capital formation at the time of incorporation of a Greek Societe Anonyme, as well as on any subsequent increase in its share capital.</p> <p>This duty shall be imposed also on any share premium amounts (amount paid above par).</p> <p>The abovementioned provision is extended to share capital increases carried out in the context of corporate transformations executed under development laws too.</p> <p>According to the Explanatory Report of Law 5255/2025, the amendment addresses recurring misinterpretations where companies calculated the duty only on the nominal share value, excluding share premium, or sought exemption/refund based on development law provisions.</p>	
	<p>Implementation of mandatory e-invoicing</p> <p>Law 5222/2025 introduces mandatory e-invoicing, while Decisions A.1128/2025 and A. 1129/2025 provide insights on the national framework for mandatory e - invoicing, defining scope, implementation phases and declaration procedures.</p> <p>E-invoicing becomes obligatory for all entities subject to Greek GAAP for domestic B2B transactions, B2B transactions with non-EU entities, and B2G transactions. E-invoices must be issued exclusively through a Licensed e-Invoicing Provider or through the application “timologio” hosted in the website of the Independent Authority for Public Revenue.</p> <p>The implementation will follow a two-stage timeline: entities with 2023 revenues above €1 million must adopt mandatory e-invoicing from 2 February 2026 (with a short adjustment period until 31 March 2026), while all remaining entities must comply from 01 October 2026 (adjustment period until 31 December 2026). Adoption declarations must be submitted by the respective start dates.</p> <p>To encourage early adoption, article 71Θ of the Greek Income Tax Code provides incentives for entities that fully switch to e-invoicing ahead of the mandatory dates, including enhanced 100% depreciation of initial equipment/software costs and an additional 100% deduction for e-invoicing-related expenses during the first 12 months. Incentives are withdrawn if declarations are revoked or if invoices are issued outside the approved channels. Entities that adopted exclusive e-invoicing within 2025 also qualify.</p> <p>Detailed information can be found here: https://www.ey.com/en_gr/technical/tax/tax-alerts/mandatory-e-invoicing</p>	<p>Review your tax accounting processes in order to safeguard compliance with the relevant requirements.</p> 
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5	<p>Significant tax measures Introduced by Law 5246/2025</p> <p>The newly enacted Law 5246/2025 introduces certain broad tax reforms on the direct and indirect tax framework.</p> <p>Effective from 2026, personal income tax rates for employees and pensioners decrease, a new 39% bracket applies to income between €40,000 and €60,000, and incentives for electronic payments are extended through 2026.</p> <p>Additional amendments include reduced deemed living expenses from 2025, expanded exemptions for long-term residential leases and a revised progressive tax scale for real estate income. Unified Real Estate Tax ("ENFIA") reductions and lower deemed business profits are extended to qualifying small or remote settlements.</p> <p>Indirect tax measures include a 30% VAT reduction for specified island and border regions, an extension of the VAT suspension on new buildings until year-end 2026 and the abolition of the television subscription duty.</p> <p>The Law also introduces a 100% super-deduction for targeted investments in defense-related and advanced manufacturing activities, strengthening the investment incentive framework.</p>	<p>Review your local group presence in order to assess whether there is any potential impact arising from the new framework.</p> 
6	<p>Digital Transportation Documents - Joint Decision A.1145/2025</p> <p>Joint Decision A.1145/2025 amends the previous framework for the scope, the timeline of transmission to myDATA platform, as well as the implementation of the digital issuance of e-transportation documents.</p> <p>All businesses not yet integrated must comply with Phase 1 obligations from 1 December 2025, issuing digital transportation documents and transmitting the relevant data to the digital platform myDATA. The second phase, covering all entities, becomes mandatory from 1 May 2026. The scope of exemptions has been expanded to include transport of spare parts for network maintenance, industrial minerals and ceramic products, newspapers and magazines via sub-agents, free educational books to public schools, and retail shipments through postal or courier services where the retail receipt is visibly attached to the parcel.</p> <p>In addition, recipients of goods are required to report deviations (surpluses or deficits) via the myDATA platform within 15 days of receipt, extended from the previous 5-day deadline. Detailed information can be found here: https://www.ey.com/en_gr/technical/tax/tax-alerts/mandatory-e-invoicing</p>	<p>Review your tax accounting processes in order to safeguard compliance with the relevant requirements.</p> 

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7	<p>Administrative guidance related to the tax neutral framework for corporate transformations provided by Law 5162/2024</p> <p>Circular 2088/2025 of the Greek Tax Authorities provided much anticipated guidance on the application of Law 5162/2024, which offers a framework for tax neutral corporate transformations. These related to the treatment of capital gains, valuation requirements and other key items. Also, this circular provided clarifications in relation to the application scope of Law 5162/2024 in certain special cases (e.g., where there is a distinction of tax residence and corporate seat, where entities fall within special tax regimes).</p> <p>The circular also provided detailed guidance on the computation of the 24-month holding requirement in the case of corporate transformations, which could be relevant in assessing entitlement tax exemptions (income tax, withholding tax, capital gains tax).</p>	
8	<p>Administrative guidance related to the implementation of Digital Transaction Duty</p> <p>Circular E.2094/2025 issued long anticipated guidance on the implementation of the Digital Transaction Duty (DTD) introduced by Law 5135/2024 and already codified in Law 5177/2025, which is effective as of 1 December 2024 having replaced Stamp Duty Code.</p> <p>It is reminded that the DTD in principle applies, to all specified transactions, contracts, and acts, whether executed in writing, electronically, or evidenced through accounting records, bank statements, receipts, or other documentation, to the extent that one of the counterparties is a Greek tax resident or a Greek permanent establishment of a foreign tax resident entity.</p> <p>The circular provided useful guidance on transitional rules, the limited cases where the DTD might be refundable, contract modifications, contracts under conditions, and others. Importantly, it was clarified that the DTD is not imposed on bond loans even if not governed by Law 4548/2018, in view of the EU free movement of capital.</p> <p>Detailed information can be found here: https://www.ey.com/en_gr/technical/tax/tax-alerts/mandatory-e-invoicing</p>	<p>Review your local group presence and transactions in order to assess whether there is any potential impact arising from the new guidance.</p> 

Contacts:

Spyros Kaminaris

Partner - Head of Tax
Ernst & Young Business Advisory
Solutions S.A.
Spyros.Kaminaris@gr.ey.com

Stella Saritzoglou

Partner
Ernst & Young Business Advisory
Solutions S.A.
stella.saritzoglou@gr.ey.com

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