

International Tax Greece Highlights 2024

Updated January 2024



Recent developments

For the latest tax developments relating to Greece, see [Deloitte tax@hand](#).

Investment basics

Currency: Euro (EUR)

Foreign exchange control: There are no restrictions on cash withdrawal and fund transfers.

Accounting principles/financial statements: IFRS or Greek GAAP applies. The application of IFRS is mandatory for corporations with listed shares or securities; IFRS is optional for other corporations and limited liability companies. New Greek GAAP, which has many similarities to IFRS, applies in all other cases. Financial statements must be prepared annually.

Principal business entities: The following categories of entities are provided for under Greek corporate legislation: corporation (SA), limited liability company (LLC (EPE in Greek)), private company (PC (IKE in Greek)), general partnership (GP (OE in Greek)), and limited partnership (LP (EE in Greek)).

Corporate taxation

Rates	
Corporate income tax rate	22%
Branch tax rate	22%
Capital gains tax rate	22%

Residence: A company incorporated under Greek law or that has its registered seat or place of effective management in Greece at any time during a tax year is considered tax resident in Greece for that tax year.

Basis: Resident entities are taxed on worldwide income; nonresident entities are taxed only on Greek-source income. Profits of branches of foreign companies in Greece are computed in the same way as profits of legal entities and are taxed at the same rate.

Taxable income: Corporate tax is imposed on a company's total annual profits before the distribution of dividends, fees paid to directors out of profits, etc. Normal business expenses are deductible for tax purposes, provided they are not

included on a list of nondeductible expenses, are incurred for the benefit of the entity, reflect real transactions that are recorded in the books in the year incurred, and are supported by the necessary tax records and sufficient documentation. Interest on loans dedicated to the acquisition of participations is deductible provided that (i) the combined turnover of the acquiring and the acquired company exceeds EUR 450,000 based on their latest published annual financial statements or corporate income tax returns (as appropriate), and (ii) the deductible amount does not exceed 30% of the average turnover of the acquiring company for the three years prior to the acquisition. These requirements and limitations do not apply where the acquiring company has not completed a full financial year, or its sole activity is the holding of participations. Guidance from the Greek tax authorities is expected on this issue.

Rate

General

The corporate income tax rate is 22% and generally applies to all forms of legal entities in Greece (except in exceptional circumstances, e.g., agricultural cooperatives). However, Greek credit institutions and Greek branches of nonresident credit institutions are taxed at 29% if they are subject to the special “deferred tax asset” recognition provision for all relevant fiscal years.

Surtax

There is no surtax.

Alternative minimum tax

There is no alternative minimum tax.

Global minimum tax (Pillar Two)

Greece has announced that it intends to transpose into its domestic legislation the EU “Pillar Two” directive that is designed to ensure a global minimum level of taxation of 15% for multinational enterprise groups and large-scale domestic groups within the EU with annual consolidated revenue of at least EUR 750 million.

Taxation of dividends: Dividends received from domestic or EU-resident subsidiaries qualifying for the participation exemption (i.e., where a 10% minimum participation is held for an uninterrupted period of at least 24 months, etc.) are exempt from corporate income tax (see “Participation exemption,” below). Dividends received from non-qualifying participations are taxable as normal business income at the prevailing corporate income tax rate, with certain credits available for taxes already paid.

Capital gains: Capital gains derived by corporations are, in principle, taxed as ordinary business profits at the prevailing corporate income tax rate. An exemption is available for capital gains derived from the transfer of shares, if certain requirements are met (see “Participation exemption,” below).

Losses: Tax losses may be carried forward for five consecutive tax years, to be set off against the taxable profits of those five tax years. Tax losses carried forward may be forfeited where there is a change in ownership of more than 33%, if the entity also changes its business activity within the same and/or the following fiscal year, and the new business activity represents more than 50% of the annual turnover compared to the fiscal year before the change in ownership took place. A change of activity is not deemed to exist if the entity continues its legacy business using the same assets and

infrastructure, or if the new activities belong to the same NACE (Nomenclature of Economic Activities) code as those of the legacy business. The carryback of losses is not permitted.

In principle, losses arising abroad from the business activities of a foreign permanent establishment (PE) may not be utilized in the calculation of the company's taxable profits (of the same fiscal year), or be set off against future profits, except in the case of losses arising from business activities of a PE in an EU or European Economic Area (EEA) member state. To that end, foreign losses of EU/EEA PEs may be used in Greece provided they are tracked separately for each member state and their origin is traceable.

Foreign tax relief: An ordinary foreign tax credit is available for income tax paid abroad, up to the amount of tax that would be payable on the relevant income in Greece (see also "Participation exemption," below).

Participation exemption: Capital gains derived from the disposal of qualified participations in domestic or EU tax resident subsidiaries may be exempt from corporate income tax if, among other requirements, a 10% minimum participation is held for an uninterrupted period of at least 24 months. The capital gains exemption also applies when the beneficial owner of the income is a Greek PE of a foreign entity based in an EU or EEA member state.

In principle, losses related to the participation are not tax deductible. However, losses deriving from qualifying participations, as defined above, and appraised through 31 December 2019 (i.e., where the impairment has been booked according to the audited financial statements) may be tax deductible after 1 January 2020 under certain conditions (i.e., where the losses have become final no later than 31 December 2024). The participation exemption regime on capital gains applies for disposals that have taken place as from 1 January 2020.

Dividends received from domestic or EU resident subsidiaries qualifying for the participation exemption (i.e., where a 10% minimum participation is held for an uninterrupted period of at least 24 months, etc.) are exempt from corporate income tax. If the participation does not meet the requirements for exemption, a foreign tax credit is granted for the amount of the underlying corporate income tax to the extent it relates to the dividends. The participation exemption does not apply to non-Greek and non-EU-source dividends.

The exemption may be claimed from the beginning of the holding period provided the recipient company submits a letter of guarantee for the amount of tax that otherwise would have been payable on the dividend income without the exemption.

The participation exemption provisions state that expenses relating to exempt income are not tax deductible.

Additionally, Greece has enacted the targeted anti-avoidance rule under the amended EU parent-subsidiary directive. Under this rule, the exemption from dividend withholding tax may not apply in the case of a non-genuine arrangement (or series of arrangements) that lacks economic and business substance when its main purpose or one of its main purposes is the pursuit of a tax benefit. The participation exemption also does not apply to the extent a hybrid mismatch situation is identified.

Holding company regime: There is no specific holding company regime.

Incentives: Certain investments qualify for subsidies. A 100% super deduction (i.e., a total deduction of 200%) applies for certain research and development (R&D) expenses, and tax deferral is available on income from the exploitation of qualifying patents. In addition, businesses may benefit from a super deduction of 30% (i.e., a total deduction of 130%) for advertising expenses incurred in fiscal year 2023, subject to certain conditions. A 100% super deduction is provided when calculating taxable profits for expenditure on green initiatives, energy efficiency, and digitization incurred by small and medium-sized enterprises for fiscal years 2023, 2024, and 2025. Assets associated with the upgrade of waste separation

and recovery centers, energy efficiency, water saving, or investments characterized as contributing substantially to climate change mitigation can be super depreciated by 100%.

Compliance for corporations

Tax year: The accounting year ends on 30 June or 31 December. Subsidiaries of foreign groups may use other year-end dates.

Consolidated returns: Group taxation is not available; each company must file a separate return.

Filing and payment: Greece operates a self-assessment regime. Corporate entities must file a tax return within six months of the tax year end. Advance payments of corporate income tax liability arising from the filing of annual corporate income tax returns are calculated at 80% of the tax due.

However, advance payments of corporate income tax liability are reduced to 50% of the tax due for legal entities during their first three years of operations. This does not apply to legal entities resulting from the conversion or merger of other legal entities.

Penalties: Penalties apply for late or inaccurate filing of returns, or failure to file a return.

Rulings: Binding rulings are not available, but a taxpayer can submit a question to the Ministry of Finance for the administration's non-binding view on the issue.

Individual taxation

Rates		
Individual income tax rate	Taxable income (EUR)	Rate
(Business and employment income)	Up to 10,000	9%
	10,001–20,000	22%
	20,001–30,000	28%
	30,001–40,000	36%
	Over 40,000	44%
Capital gains tax rate		15%

Residence: Individuals are resident in Greece if their permanent or main residence, habitual abode, or center of vital interests is located in Greece, i.e., their personal and financial ties are in Greece. Subject to this provision, individuals who are present in Greece for more than 183 cumulative days within any 12-month period are considered Greek tax resident as from the first day of their presence in Greece. Exceptions apply to individuals who visit Greece exclusively for tourism, medical, therapeutic, or similar personal purposes.

Basis: Resident individuals are taxed on their worldwide income. Nonresidents are taxed only on Greek-source income.

Taxable income: Taxable income includes employment income, business income, income from capital (dividends, interest, royalties, and rental income), and capital gains from the alienation of real estate and securities. Each category of income is taxed separately.

Rates: Business income and employment income are taxed at progressive rates ranging from 9% to 44% (the lowest rate applies to income not exceeding EUR 10,000, while the highest rate applies to income exceeding EUR 40,000).

Dividends are taxed at a rate of 5%, interest at a rate of 15%, and royalties at 20%. Rental income is taxed at progressive rates ranging from 15% to 45% (the lowest rate applies to rental income not exceeding EUR 12,000, while the highest rate applies to income exceeding EUR 35,000).

See “Other,” below, for the rates applicable under three alternative taxation regimes for new Greek tax residents.

Capital gains: Capital gains tax at a rate of 15% applies to gains arising from the sale of securities (listed and unlisted) and derivatives. Capital gains tax on the sale of real estate has been suspended through 31 December 2024 (following suspension from 1 January 2015 through 31 December 2022). A deferral of capital gains tax may apply under certain conditions to Greek tax resident individuals who contribute domestic or foreign securities (e.g., shares) to a domestic or foreign legal entity for the purpose of covering/increasing the entity’s capital, in exchange for securities (e.g., shares) issued by that entity.

Deductions and allowances: Individuals may qualify for a specific tax reduction on employment income (with the amount depending on the total taxable income and the number of children).

Taxpayers are required to use a certain minimum amount of their income (pursuant to a progressive scale) to purchase goods or services (in Greece or in the EU/EEA) using an electronic means of payment (e.g., debit or credit card). Certain taxpayers are excluded from this obligation (e.g., elderly or disabled taxpayers). If a taxpayer fails to make the minimum payment, the income tax assessment will be increased by 22% of the difference between the minimum required payment and the actual payment.

Foreign tax relief: An ordinary foreign tax credit is available for income tax paid abroad, up to the amount of tax that would be payable on the relevant income in Greece.

Other: Greece applies three alternative taxation regimes for new Greek tax residents. The alternative taxation regimes relate to investors, pensioners, and employees/freelancers. The alternative taxation is as follows:

- Investors: Annual flat tax of EUR 100,000 on total foreign-source income (maximum duration: 15 years);
- Pensioners: Flat tax rate of 7% on total foreign-source income (maximum duration: 15 years); and
- Employees/freelancers: Taxation of 50% of Greek-source employment/freelance income (maximum duration: seven years).

Compliance for individuals

Tax year: The tax year is the calendar year.

Filing status: In principle, married persons file a joint return, but each spouse’s share of income is taxed separately. However, separate income tax returns can be filed if at least one of the spouses makes an irrevocable application by 28 February of the year of filing. This option is binding on the other spouse for the tax year concerned.

Filing and payment: Individuals must file a tax return by 30 June of the year following the relevant calendar year. In principle, income tax is paid in three equal bimonthly installments, with the first installment due by the last business day of July and the others by the last business day of September and November, respectively. However, the Ministry of Finance may decide to apply alternative filing deadlines or installment plans each fiscal year depending on other factors (e.g., special circumstances such as the COVID-19 pandemic).

For individuals engaged in business activities, advance payments of income tax on those activities must equal only 55% of the tax due.

Penalties: Penalties and interest apply for late or inaccurate filing of returns, or failure to file a return.

Rulings: Binding rulings are not available, but a taxpayer can submit a question to the Ministry of Finance for the administration's non-binding view on the issue.

Withholding tax

Rates				
Type of payment	Residents		Nonresidents	
	Company	Individual	Company	Individual
Dividends	5%	5%	5%	5%
Interest	15%	15%	15%	15%
Royalties	0%	20%	20%	20%

Dividends: Dividends paid to nonresidents are subject to a 5% dividend withholding tax, unless the rate is reduced under an applicable tax treaty. No withholding tax applies on distributions to corporations if the requirements under the EU parent-subsidiary directive are met (i.e., broadly, a 10% minimum shareholding for an uninterrupted period of at least 24 months), subject to the provisions of the anti-abuse rule (see "Participation exemption" under "Corporate taxation," above). The same requirements for an exemption apply to dividend distributions between domestic companies; otherwise, a 5% rate applies. A 5% withholding tax rate also applies to dividends paid to resident individuals. No withholding tax is imposed on distributions of partnerships that maintain simplified accounting books.

Interest: The withholding tax rate on interest payments to residents and nonresidents is 15%, unless in the latter case the rate is reduced under an applicable tax treaty or the interest is paid to a corporation and is exempt under the EU interest and royalties directive, as transposed into Greek tax legislation.

Royalties: Royalties paid to individual residents and to nonresidents are subject to a 20% withholding tax, unless in the latter case the rate is reduced under an applicable tax treaty or the royalties are paid to a corporation and are exempt under the EU interest and royalties directive, as transposed into Greek tax legislation. Royalties paid to resident corporations are exempt from withholding tax.

Fees for technical services: Fees for technical, consulting, management, and similar advisory services paid to a non-EU/EEA resident entity are subject to a 20% withholding tax, unless the rate is reduced under an applicable tax treaty. Payments for such services to Greek PEs of legal entities resident in a treaty partner jurisdiction are exempt from withholding tax, provided the applicable tax treaty includes a nondiscrimination clause. Fees for technical, consulting, management, and similar advisory services paid to individuals are subject to 20% withholding tax (subject to relief under an applicable tax treaty in the case of nonresidents). Fees paid to resident and EU/EEA resident entities are not subject to withholding tax.

Branch remittance tax: There is no branch remittance tax.

Other: Fees for services relating to technical projects (e.g., construction/installation services) and paid to a resident entity or Greek PE of a nonresident entity are subject to a 3% withholding tax, subject to relief under an applicable tax treaty in the latter case.

Anti-avoidance rules

Transfer pricing: Transactions between related parties (both domestic and foreign) must be carried out on arm's length terms. Greece allows the following transfer pricing methods: comparable uncontrolled price, cost plus, transactional net margin, resale price, and profit split. Transfer pricing documentation must be prepared.

Country-by-country (CbC) reporting and/or notification obligations apply to certain multinational enterprise groups that have consolidated group revenue exceeding EUR 750 million in the fiscal year preceding the fiscal year to which the CbC report relates.

Interest deduction limitations: In line with the EU anti-tax avoidance directive (ATAD), which has been transposed into Greek tax legislation, the interest deduction limitation rules disallow a deduction for certain interest paid on all categories of debt. In particular, a company's exceeding borrowing costs are tax deductible in the tax year in which they are incurred only up to 30% of the company's EBITDA (earnings before interest, taxes, depreciation, and amortization). However, this limitation percentage does not apply to exceeding borrowing costs up to an amount of EUR 3 million (assessed on an entity-by-entity basis), which are tax deductible (*de minimis* rule). Exceeding borrowing costs that cannot be deducted in the tax year incurred may be carried forward indefinitely.

The concept of the group escape option from the application of the EBITDA rule, in line with the option provided under the ATAD, has been adopted. A taxpayer that is a member of a consolidated group for financial accounting purposes under Greek GAAP has the right to either (i) fully deduct its exceeding borrowing costs under certain conditions, or (ii) deduct its exceeding borrowing costs in excess of the amount that it normally would be entitled to deduct. This higher limit is calculated by referring to the exceeding borrowing costs of the taxpayer's consolidated group.

Controlled foreign companies: Greece has implemented controlled foreign company (CFC) rules based on the ATAD. The CFC rules provide, broadly, that the undistributed passive income (e.g., dividends) from affiliates of a foreign subsidiary satisfying certain conditions will be attributed to and taxed in the hands of the Greek resident controlling shareholder (control being defined as direct or indirect ownership exceeding 50%). The application of the CFC rules results in the taxation of "deemed" income as business profits. The CFC rules may not apply in cases where a CFC carries out substantial economic activities (as supported by personnel, equipment, assets, and facilities/premises) evidenced by relevant facts, except in cases where the CFC is tax resident in a jurisdiction that is not a contracting party to the EEA Agreement.

Anti-hybrid rules: In line with the provisions of the EU parent-subsidiary directive, Greek tax legislation provides rules for tackling hybrid mismatch issues. Specifically, inbound dividends at the level of a Greek parent entity may be tax exempt under the directive (as implemented in Greek tax legislation), but only to the extent that the relevant income is not treated as a tax-deductible expense (e.g., interest) at the level of the payer/subsidiary. Greece has implemented the ATAD anti-hybrid rules in their entirety. The provisions incorporate the relevant rules of the ATAD, which are largely inspired by action 2 (Neutralizing the Effects of Hybrid Mismatch Arrangements) of the OECD/G20 BEPS project.

A reverse hybrid mismatch rule also applies. If one or more affiliated nonresident entities maintain at least a 50% interest, directly or indirectly, in the voting rights, capital, or rights to a profit share of a hybrid entity incorporated or established in Greece, and the nonresident entities are located in a jurisdiction or jurisdictions that treat the hybrid entity as taxable in Greece, the hybrid entity is considered to be Greek tax resident and taxed on its income to the extent that the income is not already taxed. The reverse hybrid mismatch rule applies retroactively as from 1 January 2022.

Economic substance requirements: Although there are no specific rules governing economic substance requirements in Greek tax law, some guidance can be implied by reference to other provisions in the tax law, namely, the tax residency criteria and the CFC legislation. Both provide guidance for examining and interpreting substance requirements/criteria. For example, the place of effective management is considered to be the main criterion to determine the Greek tax residence status of a corporate entity and the CFC rules consider an activity to be a substantial economic activity (necessary for the CFC rules not to be invoked) if it is supported by personnel, equipment, assets, and facilities/premises evidenced by the relevant facts and circumstances.

Disclosure requirements: Filing and publication of annual financial statements are required.

Exit tax: Greece has implemented exit tax rules under the ATAD. Exit tax applies to a transfer of assets from a head office to a PE or between PEs, as well as to transfers of business activity carried on by a PE in Greece, in another EU member state, or in a third jurisdiction to the extent that Greece no longer has the right to tax the transferred assets as a result of the transfer. It also applies, in principle, when a taxpayer transfers its tax residence to another EU member state or to a third jurisdiction. These provisions do not apply to individuals. The relevant taxable basis is the market value of the assets transferred, minus their value for tax purposes at the time of exit. The tax is calculated by applying the corporate income tax rate applicable for the tax year of the exit.

General anti-avoidance rule: Under the general anti-avoidance rule, the tax authorities may disregard any non-genuine arrangement or series of arrangements whose purpose is to evade taxation and lead to a tax advantage. An arrangement is considered non-genuine if it is not put in place for valid commercial reasons that reflect economic reality. The rules are aligned with the relevant provisions of the ATAD, which have been implemented into Greek tax legislation.

Other: Transactions with persons located in “blacklisted” offshore and beneficial tax regimes are subject to anti-avoidance provisions that could result in the disallowance of expenses for tax purposes. Moreover, anti-abuse rules regarding the application of the participation exemption regime (see “Participation exemption” under “Corporate taxation,” above) and business transformations have been enacted.

Value added tax

Rates	
Standard rate	17% (islands of Chios, Kos, Leros, Lesvos, and Samos)/24% (Greek mainland and other islands)
Reduced rate	0%/9% (islands of Chios, Kos, Leros, Lesvos, and Samos)/13% (Greek mainland and other islands)
Super reduced rate	0%/4% (islands of Chios, Kos, Leros, Lesvos, and Samos)/6% (Greek mainland and other islands)

Taxable transactions: VAT is imposed on the sale of goods and the provision of services by a VATable person acting as such toward another VATable person for a consideration when Greece is the place of taxation, in accordance with the place of supply rules, unless a specific VAT exemption applies. VAT also is due on intra-Community acquisitions of goods from EU-based suppliers with transportation of the goods from an EU member state to Greece. Imports of goods from non-EU jurisdictions are performed in Greece, provided these are within the Greek territory when they enter the EU and, therefore, import VAT is due, unless the goods are placed under a special VAT and customs suspension regime. In case of local receipt of services of a general nature from a Greek-based supplier, Greek VAT should be charged on the invoice issued, unless a specific exemption or process applies according to which no VAT is due. The receipt of services of a general nature from a non-Greek supplier (either an EU or non-EU-based supplier) is, in principle, subject to Greek VAT and such VAT should be attributed to the Greek state by the recipient through the application of the reverse charge mechanism. In case of services falling under the “place of supply” exception (such as services related to real estate located in Greece), further factual analysis is required.

The supply of newly built property is subject to VAT, under certain conditions, provided the building contractor has not applied for the VAT suspension regime. If the building contractor has elected the VAT suspension regime, the sale of real estate is subject to real estate transfer tax and not VAT and the taxpayer is not able to deduct any construction or operational VAT incurred. The sale of old property is a VAT-exempt activity, without an input VAT deduction right.

Rates: The standard VAT rate is 24%, the reduced rate is 13%, and the super reduced rate is 6%. Specific supplies are exempt, with or without the right to deduct input VAT. Special reduced VAT rates of 17%, 9%, and 4% (i.e., the standard 24%, reduced 13%, and super reduced 6% rates, respectively, reduced by 30%) apply indefinitely and regardless of any population criteria to five specific Greek islands: Chios, Kos, Leros, Lesvos, and Samos, as long as accommodation structures and centers have been established and are in operation for citizens of third jurisdictions or stateless persons, subject to certain conditions. The special reduced rates do not apply to manufactured tobacco products and means of transport.

Registration: Greek-based entities generally must register for tax purposes and are assigned a unique tax/VAT number, which is used for all taxes. Non-Greek VATable persons must register for VAT in case they incur VAT liabilities in Greece; EU entities must register directly electronically or, at their option, through the appointment of a fiscal representative; and non-EU entities must register only through the appointment of a fiscal representative.

Greece has incorporated the provisions of Council Directives (EU) 2017/2455, 2019/1995, and 2018/1910 into Greek VAT legislation with respect to intra-Community distance sales of goods and distance sales of imported goods, the supply of goods through the use of electronic interfaces, and the supply of services to non-VATable persons (e-commerce). Under the One Stop Shop (OSS) regime, taxable persons/suppliers may opt to be subject to one of the OSS special schemes (through electronic application), instead of registering for VAT purposes in each member state where the related transactions take place. More specifically, the non-EU OSS scheme covers all cross-border business-to-consumer (B2C) services supplied by non-EU established suppliers to nontaxable persons, including the supply of telecommunications, broadcasting, and electronically supplied services (TBE services). The EU OSS scheme covers all cross-border B2C services supplied by EU established suppliers to nontaxable persons, including the supply of TBE services; intra-Community distance sales of goods; and certain supplies of goods that are carried out through the use of electronic interfaces (“deemed supplier”), provided that the initial supplier of the goods is not established in the EU. A non-EU supplier is not required to appoint a fiscal representative for VAT purposes in Greece in order to use the OSS application.

An EU-wide threshold of EUR 10,000 applies, below which the supply of TBE services to nontaxable persons, as well as intra-Community distance sales of goods, may remain taxable in the member state where the taxable person/supplier of TBE services is established, or in the member state where the goods are located, when the dispatch or transport begins, unless otherwise chosen by the supplier/seller. Beyond this EUR 10,000 threshold, supplies of goods or services are taxed in the member state where the goods arrive, or the place where the nontaxable recipient of services is established, has their permanent residence, or usually stays, respectively.

Filing and payment: VAT returns are due on a quarterly or monthly basis by the last working day of the following month, depending on the type of books kept by the VAT payer; non-Greek VATable persons merely registered for VAT purposes in Greece must file returns on a quarterly basis. The VAT payment is due on the same date. In cases where the amount of VAT due does not exceed EUR 30, the liability is transferred to the next tax period; if the amount due exceeds EUR 100, it may be paid in two equal consecutive monthly installments, without any additional charges. The amount of the first installment must be paid by the last business day of the month in which the VAT return was submitted, and the second by the last business day of the next month.

A statistical declaration (Intrastat Intra-EU Import/Intra-EU Export Declaration) and EC sales/purchases/acquisitions lists must be submitted on a monthly basis by the 26th day of the following month, if intra-Community transactions take place.

Other taxes on corporations and individuals

Unless otherwise stated, the taxes in this section apply both to companies and individuals and are imposed at the national level.

Social security contributions: Employers generally must contribute approximately 22.29% of each employee's gross salary to the social insurance fund, while full-time salaried employees must contribute 13.87%.

Payroll tax: Employers are required to operate under a pay-as-you-earn system (PAYE), according to which withholding tax is imposed on salary payments to employees.

Capital duty: A 0.2% capital duty is payable on share capital increases. The issuance of share capital upon the formation of a company is exempt from capital duty, as is capital invested exclusively in R&D activities. A 0.1% surcharge for the benefit of the competition committee applies on the contribution of capital to an SA (whether upon formation or an increase).

Real property tax: Real estate ownership tax is imposed annually on property located in Greece. For legal entities, the tax consists of two elements: a main tax and an additional tax. The main tax is imposed based on a statutory formula that takes into account specific features of the property (size, location, zone price, surface, age, use, and other characteristics). The additional tax is calculated at a rate of 0.55% on the total tax value of all of the company's property. Property occupied by the company and used for its own business is subject to a 0.1% additional tax.

Individuals are subject to a main tax (calculated as above), plus a "tax per total property value," an additional main tax component for properties whose value exceeds EUR 400,000. In addition, a tax readjustment increasing the total tax burden applies to individuals whose properties' total taxable value exceeds EUR 500,000 (excluding plots outside urban-planning areas).

For companies, there is also an annual special tax of 15% of the tax value of property, subject to certain exemptions. The tax normally is not payable if the company discloses its shareholders up to the level of the individual or a qualifying investment firm/fund.

A special real estate duty is payable to the municipal authorities, at rates ranging from 0.025% to 0.035%.

Transfer tax: Real estate transfer tax (RETT) is imposed on the value of transferred property at a flat rate of 3.09% (including the municipality surcharge). RETT is not imposed if VAT is due on the purchase of new buildings.

Stamp duty: Stamp duty may be imposed on certain transactions. Stamp duty of 1.2%, 2.4%, or 3.6% applies, depending on the transaction. The usual rate for transactions between individuals is 3.6%.

Net wealth/worth tax: There is no net wealth tax or net worth tax.

Inheritance/estate tax: For close relatives, inheritance tax at rates ranging from 0% to 10% is imposed on the "tax value" of real estate after the deduction of a tax-free amount, which varies depending on the taxpayer's relationship with the deceased. For other heirs, the applicable rates range from 0% to 40%.

Other: Special tax regimes apply to shipping companies, coordination centers, real estate investment companies, and mutual funds.

In addition to transfer taxes (e.g., on real estate), acquisitions can result in income tax if they cannot be justified by the taxpayer's declared revenue (deemed income). If there is a difference between the taxpayer's real income (declared in the tax return) and the deemed income, the difference is subject to income tax, depending on the type of income.

Deemed income is calculated based on the assets owned or transactions carried out by the taxpayer—i.e., loans, automobile purchases, donations, purchases of securities, etc.

Luxury tax also is imposed on owners of swimming pools and cars with engine capacity higher than 1,929 cc.

Listed stock sales tax is imposed at a rate of 0.1% on the sale of shares listed on a Greek regulated market or a multilateral trading facility, subject to several exemptions. The tax is calculated on the sale price and is borne by the seller, whether it is a natural person or a legal person (entity), irrespective of citizenship, place of residence, or registered seat.

Tax treaties: Greece has concluded over 50 tax treaties. The Multilateral Convention to Implement Tax Treaty Related Measures to Prevent Base Erosion and Profit Shifting (BEPS MLI) entered into force for Greece on 1 July 2021.

For information on Greece’s tax treaty network, visit [Deloitte International Tax Source](#).

Tax authorities: Ministry of Finance, Public Revenue Independent Authority

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