



ICLG

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Corporate Tax 2018

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Greece

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1 Tax Treaties and Residence

1.1 How many income tax treaties are currently in force in your jurisdiction?

Greece has concluded income tax treaties with fifty-seven (57) states, i.e. all the EU Member States and Albania; Armenia; Azerbaijan; Bosnia-Herzegovina; Canada; China; Egypt; Georgia; Iceland; India; Israel; the Republic of Korea; Kuwait; Mexico; Moldova; Morocco; Norway; Qatar; Russia; the Republic of San Marino; Saudi Arabia; Serbia; South Africa; Switzerland; Tunisia; Turkey; Ukraine; the United Arab Emirates; the USA; and Uzbekistan.

1.2 Do they generally follow the OECD Model Convention or another model?

Greece's tax treaties are generally based on the OECD Model Convention (with the exception of the treaties with the USA and the UK, which were both concluded in 1953, i.e. prior to 1963 when the first draft of the model was published).

1.3 Do treaties have to be incorporated into domestic law before they take effect?

Greece follows the dualistic principle. Thus, as prescribed by article 36(2) of the Greek Constitution, treaties (including income tax treaties) need to be incorporated into domestic law, by virtue of a statute voted by the Greek parliament and published in the Official Government Gazette, before they take effect.

1.4 Do they generally incorporate anti-treaty shopping rules (or "limitation on benefits" articles)?

Tax treaties concluded by Greece do not generally incorporate anti-treaty shopping rules, with the following exceptions:

- (i) the Greece-Luxembourg tax treaty precludes from its provisions Luxembourgian holding companies;
- (ii) the Greece-USA tax treaty provides for a limitation on benefits clause; and
- (iii) recent tax treaties (e.g. Belgium, Ireland, etc.) contain anti-abuse provisions precluding the application of treaty benefits concerning interest and royalties.

On 7 June 2017, Greece signed the Multilateral Convention to Implement Tax Treaty Related Measures to Prevent BEPS, in which a number of anti-treaty shopping rules are included.

1.5 Are treaties overridden by any rules of domestic law (whether existing when the treaty takes effect or introduced subsequently)?

According to article 28 (1) of the Greek Constitution, international treaties, once they are ratified by law and come into effect, constitute an integral part of the internal legal order and supersede any contrary domestic provision. This applies to both existing and subsequently-introduced domestic law provisions.

1.6 What is the test in domestic law for determining the residence of a company?

A legal entity or other entity is considered tax-resident in Greece if one of the following conditions is met: it has been incorporated or established according to the Greek legislation; it has its registered seat in Greece; or the place of effective management is located in Greece. The determination by the tax authorities that the effective management of a legal entity is exercised in Greece is made on the basis of the actual facts and circumstances of each case and by taking into account mainly the place where day-to-day management is exercised, the place where strategic decisions are made, the place where the annual general meeting of shareholders or partners is held, the place where the books and records are kept, the place where the meeting of the members of the board of directors (BoD) or other executive management board takes place, and the residence of the members of the BoD or other executive management board. The residence of the majority of the shareholders or partners may also be taken into consideration. Companies that are established and operate according to Law 27/1975 on the taxation of vessels and L.D. 2687/1954 on the investment and protection of foreign capital are explicitly excluded from the application of these provisions on tax residence.

2 Transaction Taxes

2.1 Are there any documentary taxes in your jurisdiction?

Stamp duty is levied on a limited number of transactions, documents and contracts, in the form of a percentage on the value of the transaction, which is not subject to VAT. The most notable cases where stamp duty applies are commercial property leases (3.6%), private loan agreements (2.4–3.6%), commercial loan agreements (2.4%) and cash withdrawal facilities granted to shareholders and partners (1.2%).

2.2 Do you have Value Added Tax (or a similar tax)? If so, at what rate or rates?

The Greek Value Added Tax Code is based on EC Directive 2006/112/EC, i.e. on the common system of Value Added Tax (the former Sixth EC Directive). The standard VAT rate is 24%. Two other rates may apply depending on the nature of goods or services (13% and 6%). VAT rates reduced by 30%, namely to 17%, 9% and 4% apply in certain Greek islands (e.g. Lesbos, Chios, Samos etc.). Such reduced-rate status shall remain until 12 December 2017.

2.3 Is VAT (or any similar tax) charged on all transactions or are there any relevant exclusions?

VAT applies to all stages of production and distribution of goods, provision of services and intra-community acquisitions or imports of goods from abroad, against a consideration.

However, VAT exemptions are applicable which either: (i) preclude the recovery of input VAT (e.g. provision of services of a social or cultural nature, such as medical services, educational services, insurance services and most banking services); or (ii) do not, in which case the supplies are treated as zero-rated (e.g. exports, intra-community supplies, international transit of goods and transactions related to shipping and the aircraft sector).

2.4 Is it always fully recoverable by all businesses? If not, what are the relevant restrictions?

Taxable persons are entitled to deduct input VAT from output VAT, as long as the goods and services are wholly used in taxable transactions within the same tax period or in exempt transactions but with retention of the right to deduct VAT. However, input VAT on supplies that are used to render tax-exempt supplies without retention of the right to deduct VAT is, in principle, not deductible.

If taxable persons render both taxable and tax-exempt services, input VAT on supplies for both has to be split up according to the respective percentage of taxable supplies to determine the deductible part of input VAT.

If input tax is higher than output tax at the end of the tax year, such difference may be either carried forward or refunded, if certain conditions are met.

Lastly, there are a number of expenditures for which input VAT is not deductible, e.g. hotel accommodation, food, drink and tobacco.

2.5 Does your jurisdiction permit “establishment only” VAT grouping, such as that applied by Sweden in the *Skandia* case?

No, it does not.

2.6 Are there any other transaction taxes payable by companies?

1. Real estate transfer tax is imposed on the higher of the objective value or the market value of the property sold and is borne by the buyer at a percentage of 3% (except from the first sale of new buildings, where VAT applies with respect to building licences issued after 1 January 2006).
2. Sales of shares listed on the Athens Stock Exchange or any other recognised stock exchange market are subject to 0.2% transaction tax.

2.7 Are there any other indirect taxes of which we should be aware?

1. Customs duties are imposed on imports from non-EU Member States, as prescribed by the Community Customs Code and the Common Customs Tariff.
2. Excise duties on coffee, tobacco products, alcohol and alcoholic drinks, and fuels (heating and transportation) are imposed in line with EU law.
3. A special luxury tax is levied on certain categories of goods considered “luxury goods”, such as leather goods, jewellery and precious stones, precious metals, aircraft, seaplanes and helicopters of private use.
4. As of 1 June 2016, cars, motorcycles and trucks that enter Greek territory are subject to registration duty at new rates varying from 4% to 32% on their retail sale price (before taxes), regardless of their cylinder capacity. Hybrid cars, previously exempted, are also burdened with 50% of the applicable registration duty.
5. Insurance tax applies on the amount of premiums and related costs charged by insurance companies, and is borne by the customer. The rates vary from 4% to 20% depending on the type of insurance. Life insurance premiums paid in the context of contracts with a duration of at least 10 years are exempted.
6. An annual contribution of 0.6% is imposed on the average outstanding monthly balance of each loan granted by a bank operating in Greece or abroad. Certain exceptions apply in regard to loans between banks, loans to the Greek State, loans funded by the European Investment Bank, etc.

3 Cross-border Payments

3.1 Is any withholding tax imposed on dividends paid by a locally resident company to a non-resident?

Dividends or profits distributed by a locally resident company to a non-resident are subject to (final) withholding tax at a rate of 15%. Profits deriving from a branch of a foreign company are not subject to any withholding tax on distribution.

Dividend income may be subject to a lower withholding tax rate, provided the recipient of the dividend income is resident in a state with which Greece has concluded a tax treaty which provides for a more favourable tax treatment. No withholding tax applies if the conditions of the EU Parent-Subsidiary Directive (2011/96/EU) are satisfied (i.e. a 10% minimum shareholding for an uninterrupted period of at least 24 months), subject to the provisions of the recently enacted anti-abuse rules concerning hybrid mismatch arrangements and tax avoidance arrangements without economic and business substance that are solely aimed at obtaining a tax benefit.

3.2 Would there be any withholding tax on royalties paid by a local company to a non-resident?

Royalties paid to a non-resident are subject to a 20% (final) withholding tax, subject to a reduced rate under an applicable tax treaty or the application of the EU Interest and Royalties Directive (i.e. a 25% minimum shareholding for an uninterrupted period of at least 24 months).

3.3 Would there be any withholding tax on interest paid by a local company to a non-resident?

Interest payments effected to a non-resident are subject to a 15% (final) withholding tax, subject to a reduced rate under an applicable tax treaty or the application of the EU Interest and Royalties Directive (i.e. a 25% minimum shareholding for an uninterrupted period of at least 24 months). It is to be noted that interest received from Greek government bonds and treasury bills by legal entities that are not tax-resident in Greece and that do not maintain a permanent establishment in Greece are not subject to withholding tax.

3.4 Would relief for interest so paid be restricted by reference to “thin capitalisation” rules?

Pursuant to the Greek “thin capitalisation” rules, interest costs are not recognised as deductible business expenses if: a) they exceed the amount of EUR 3,000,000 per year; and b) they exceed interest income and that excess interest expenditure exceeds 30% of taxable earnings before interest, tax, depreciation and amortisation (EBITDA). Any interest cost that is thus not deductible may be carried forward indefinitely to future years and will be deductible in future years to the extent that those future years indicate an uncovered EBITDA amount.

3.5 If so, is there a “safe harbour” by reference to which tax relief is assured?

There is no safe harbour. However, it should be noted that the aforementioned “thin capitalisation” rules do not apply to credit institutions, leasing companies, and factoring companies that are licensed by the Bank of Greece or respective regulatory authorities of other EU Member States.

3.6 Would any such rules extend to debt advanced by a third party but guaranteed by a parent company?

Yes, interest from loans guaranteed by a parent company is deductible, on the conditions prescribed under the aforementioned “thin capitalisation” rules.

3.7 Are there any other restrictions on tax relief for interest payments by a local company to a non-resident?

Interest expenses on loans received from third parties, to the extent that they exceed the interest that would arise if the interest rate was equal to the interest rate of loans on open deposit/withdrawal accounts provided to non-financial corporations, as indicated in the Statistical Bulletin of the Central Bank of Greece for the nearest period preceding the date of borrowing, are not tax-deductible. The above interest deductibility restrictions do not apply to inter-bank loans, bonds, and inter-company loans issued by *sociétés anonymes*.

In addition, interest payments to tax residents in non-cooperative states (i.e. non-EU Member States which have not concluded and do not apply a convention on administrative assistance in tax matters with respect to Greece and at least 12 other countries) or states with a preferential tax regime (i.e. states where there is no taxation or *de facto* taxation, or where profits, income or capital are taxed at a rate equal to or lower than 50% of the corresponding Greek tax rate) are not tax-deductible, unless the taxpayer proves that these expenses relate to real and ordinary transactions and do not result in

transfer of profits, income or capital for tax avoidance or evasion. Exceptionally, deduction of interest expenses paid to a tax resident in an EU/EEA Member State is not precluded, if a legal basis for exchange of information between Greece and the Member State in question exists.

3.8 Is there any withholding tax on property rental payments made to non-residents?

No, there is not.

3.9 Does your jurisdiction have transfer pricing rules?

A general provision sets out the “arm’s length” principle by stating that any profit not realised by a domestic legal person or legal entity due to economic or commercial terms in transactions with associated persons different from the terms that would apply between non-associated persons (independent businesses) or between associated persons and third parties, increases the taxable base of the domestic legal person or legal entity by following the OECD’s general principles and guidelines for intercompany transactions.

“Associated person(s)” means: a) any person who directly or indirectly owns shares, parts or participation equity in another person of at least 33% in value or number, or rights to profits, or voting rights; b) two or more persons, if a third person owns directly or indirectly shares, parts, voting rights or participation equity in such persons of at least 33% in value or number, or rights to profits, or voting rights; or c) any person with whom there is a direct or indirect relationship of substantial management dependence or control, or who exercises decisive influence or has the ability to exercise decisive influence over another person, or if both persons have a direct or indirect relationship of substantial management dependence or control or the ability to exercise decisive influence through a third party.

Specific rules exist for the transfer pricing documentation file, as well as the procedure for an Advance Pricing Arrangement (APA) related to transfer pricing methodology.

4 Tax on Business Operations: General

4.1 What is the headline rate of tax on corporate profits?

The headline rate of tax on corporate profits is 29%.

By virtue of Law 4472/2017, published on 19 May 2017, any business income realised by legal persons/legal entities as of 1 January 2019 shall be taxed at a rate of 26%, with the exemption of credit institutions, for which the currently applicable rate of 29% shall continue to be applicable. The reduction of the corporate income tax rate from 29% to 26% shall be applicable, on the condition that there is no divergence from the medium-term budgetary objectives set in the Economic Adjustment Program following an assessment of the International Monetary Fund and the European Commission in collaboration with the European Central Bank, the European Stability Mechanism, and the Greek authorities.

4.2 Is the tax base accounting profit subject to adjustments, or something else?

Taxable business profit occurs after deduction, from the entire business income, of the business expenses, the depreciation and the

provisions for bad debts. Business income includes the revenues from sale of assets as well as the liquidation proceeds. Taxable profit is determined each tax year, as set out in the entity's P&L account, according to the Greek Accounting Standards or the International Accounting Standards (IAS), after adjustment for income tax purposes.

4.3 If the tax base is accounting profit subject to adjustments, what are the main adjustments?

Deduction of expenses is subject to the following conditions: they (i) are incurred in the interest of the business or in the ordinary course of the business; (ii) correspond to an actual transaction and the value of the transaction is not deemed lower or higher than the market value, based on elements available to the tax administration; and (iii) are entered in books where transactions are recorded for the period in which they are incurred and are supported by appropriate documentation. In addition, specifically prescribed expenses are not deductible, e.g. interest on loans received from third parties, except for bank loans, interbank loans and bond loans issued by corporations, to the extent that they exceed the interest that would arise if the interest rate was equal to the rate of overdraft account loans to non-financial corporations, as indicated in the Statistical Bulletin of the Bank of Greece for the nearest period preceding the date of borrowing; any expense related to a purchase of goods or services, of more than EUR 500, where partial or total payment was not made via a bank payment instrument; fines and penalties, etc.

4.4 Are there any tax grouping rules? Do these allow for relief in your jurisdiction for losses of overseas subsidiaries?

No, there are not.

4.5 Do tax losses survive a change of ownership?

If, during a tax year, direct or indirect ownership of the share capital or the voting rights of a company has changed by more than 33% in value or in number, the right to carry forward tax losses ceases to apply unless the taxpayer proves that the change of ownership has been made exclusively for commercial or business purposes and not for tax avoidance or tax evasion.

4.6 Is tax imposed at a different rate upon distributed, as opposed to retained, profits?

Tax is not imposed at a different rate to distributed and retained profits.

However, in the case of capitalisation or distribution of profits which have not been subjected to any corporate income tax (e.g. untaxed reserves), the capitalised or distributed amount is, in any case, subject to corporate income tax.

4.7 Are companies subject to any significant taxes not covered elsewhere in this chapter – e.g. tax on the occupation of property?

The ownership of real estate property/property rights in Greece is subject to the Uniform Tax on the Ownership of Real Estate Property (ENFIA), which consists of a principal tax imposed on each real estate property and a supplementary tax imposed on the total value of the property rights on real estate property of the taxpayer subject to tax.

Said tax is not imposed on the objective value of real estate property, but is determined on the basis of various factors, according to the final registration of the property at the land registry or the ownership title.

In addition, a special real estate tax is imposed on companies which have ownership or usufruct on real estate located in Greece at the rate of 15%. However, exemptions are provided by law, e.g. listed companies, companies with gross revenues from other activities higher than those revenues derived from the exploitation of real estate in Greece, *sociétés anonymes* with registered shares up to the level of individual shareholder(s) or which declare their ultimate individual shareholders with a Greek tax registration number, etc.

5 Capital Gains

5.1 Is there a special set of rules for taxing capital gains and losses?

In general, capital gains derived by a Greek company are taxed as business profits and are, thus, included in the taxable profits of the company and taxed at the standard corporate income tax rate of 29%.

The income derived from the goodwill arising upon the transfer of Greek government bonds or Greek treasury bills that are acquired by legal entities that do not qualify as Greek tax residents and do not maintain a permanent establishment in Greece is tax-exempt.

5.2 Is there a participation exemption for capital gains?

No, there is not.

5.3 Is there any special relief for reinvestment?

No, there is not.

5.4 Does your jurisdiction impose withholding tax on the proceeds of selling a direct or indirect interest in local assets/shares?

No, it does not.

6 Local Branch or Subsidiary?

6.1 What taxes (e.g. capital duty) would be imposed upon the formation of a subsidiary?

The issuance of share capital upon formation of a company is exempt from capital duty. A 0.1% surcharge for the benefit of the competition committee applies on the contribution of capital to a *société anonyme* upon its formation or any increase.

6.2 Is there a difference between the taxation of a local subsidiary and a local branch of a non-resident company (for example, a branch profits tax)?

No, there is not.

6.3 How would the taxable profits of a local branch be determined in its jurisdiction?

A branch located in Greece is treated, according to the so-called Authorised OECD Approach (AOA), as a functionally separate entity, although it is legally a part of the parent company. Its profits are determined by taking into account the functions performed, assets used and risks assumed by the enterprise through the branch. The Greek branch of a foreign head office is subject to Greek corporate income tax as if it were a Greek corporation.

6.4 Would a branch benefit from double tax relief in its jurisdiction?

The head office, but not the branch itself, is entitled to treaty benefits because a branch is legally a part of its head office and not a resident for tax treaty purposes. However, the non-discrimination clauses in the tax treaties that Greece has signed are applicable. For EU Member States, discrimination of branches would also be prohibited by freedom of establishment.

6.5 Would any withholding tax or other similar tax be imposed as the result of a remittance of profits by the branch?

No, it would not.

7 Overseas Profits

7.1 Does your jurisdiction tax profits earned in overseas branches?

Resident companies are taxed on their worldwide income. Therefore, profits earned in foreign branches are included in the Greek corporate income tax base of the Greek corporations.

7.2 Is tax imposed on the receipt of dividends by a local company from a non-resident company?

A participation exemption regime applies to intra-group dividends received by a local company from a non-resident company which has its legal seat in another EU Member State, subject to the provisions of the EU Parent-Subsidiary Directive (2011/96/EU). Dividends received by other non-resident companies are subject to the normal tax rate, subject to any foreign tax credit or exemption, if provided by any applicable tax treaty or the domestic legislation.

7.3 Does your jurisdiction have “controlled foreign company” rules and, if so, when do these apply?

“Controlled foreign company” rules were introduced into the Greek tax legislation for the first time pursuant to Law 4172/2013 (effective as of 1 January 2014).

According to these rules, the taxable income of a taxpayer with tax residence in Greece includes undistributed income of a legal person or legal entity with tax residence in another country, under the following conditions:

- the taxpayer, alone or together with affiliated persons, directly or indirectly owns shares, parts, voting rights, or participation in equity in excess of 50% or is entitled to receive more than 50% of the profits of that legal person or legal entity;

- the above legal person or legal entity is subject to taxation in a non-cooperative state or in a state with a preferential tax regime;
- more than 30% of the net income before taxes earned by a legal person or legal entity derives from interest or other income generated from financial assets, dividends, royalties or capital gains, income from movable or immovable property, or income from insurance, banking, or other financial activities;
- more than 50% of the corresponding source of income, as illustrated above, of the legal person or entity arises from transactions with the taxpayer or with its affiliates; and
- the legal person or entity is not a company whose principal class of shares is subject to trading on a regulated market.

The above do not apply to legal persons or legal entities with tax residence in an EU or EEA Member State, unless the establishment or the financial activity of such legal entity constitutes a fictitious situation with a view to avoiding taxation.

8 Taxation of Commercial Real Estate

8.1 Are non-residents taxed on the disposal of commercial real estate in your jurisdiction?

Legal entities which are non-resident or do not maintain a permanent establishment in Greece are not subject to Greek corporate income tax. Therefore, capital gains from the disposal of commercial real estate located in Greece by a non-resident legal entity are not subject to tax in Greece.

8.2 Does your jurisdiction impose tax on the transfer of an indirect interest in commercial real estate in your jurisdiction?

Capital gains earned by individuals that arise from the transfer of participations which attract more than 50% of their value directly or indirectly from real estate and do not constitute income from business operations, are taxed at a rate of 15%. If the aforementioned income constitutes business income, it is taxed at the ordinary corporate income tax rate of 29%.

8.3 Does your jurisdiction have a special tax regime for Real Estate Investment Trusts (REITs) or their equivalent?

No. However, a special regime exists with respect to corporations that invest in real estate.

9 Anti-avoidance and Compliance

9.1 Does your jurisdiction have a general anti-avoidance or anti-abuse rule?

A general anti-avoidance rule was first introduced with the Greek Code of Tax Procedures (Law 4174/2013). Under this rule, the tax administration may disregard any artificial arrangement or series of arrangements that aim at the evasion of taxation and lead to a tax advantage. An arrangement is considered artificial if it lacks commercial substance and is aimed at the evasion of taxation or towards a tax benefit. To determine if an arrangement is artificial, various characteristics are examined. For the purposes of this measure, the goal of an arrangement is to avoid taxation if,

regardless of the subjective intention of the taxpayer, it is contrary to the object, spirit and purpose of the tax provisions that would apply in other cases. To determine the tax advantage, the amount of tax due after taking into consideration such arrangements is compared to the tax that would be payable by the taxpayer under the same conditions in the absence of such an arrangement.

9.2 Is there a requirement to make special disclosure of avoidance schemes?

No, there is not.

9.3 Does your jurisdiction have rules which target not only taxpayers engaging in tax avoidance but also anyone who promotes, enables or facilitates the tax avoidance?

A person who assists or instigates another person or collaborates with another person in the commitment of tax avoidance is liable to the same penalties as the taxpayer.

In addition, a person who by any means knowingly collaborates or offers immediate assistance in committing tax evasion is punishable as a primary accessory in the crime.

9.4 Does your jurisdiction encourage “co-operative compliance” and, if so, does this provide procedural benefits only or result in a reduction of tax?

No. However, tax amnesty schemes and voluntary disclosure programmes are occasionally introduced, providing for tax/penalty reductions or other procedural benefits.

10 BEPS and Tax Competition

10.1 Has your jurisdiction introduced any legislation in response to the OECD's project targeting Base Erosion and Profit Shifting (BEPS)?

Greece has already implemented into domestic law the EU VAT Directive regarding the VAT on B2C digital services and the anti-avoidance measures included in the EU Parent-Subsidiary Directive.

The existing transfer pricing rules refer to the OECD guidelines, which are, thus, immediately effective.

Greece has signed a multilateral competent authority agreement for the automatic exchange of CBC reports and the Multilateral Convention to Implement Tax Treaty Related Measures to Prevent BEPS.

A mutual administrative procedure provision has been included in the Greek Code of Tax Procedures.

Greece is required to implement into domestic law the two EU Anti-Tax Avoidance Directives (ATAD and ATAD 2) which provide for controlled foreign company, anti-hybrid and interest limitation rules.

10.2 Does your jurisdiction intend to adopt any legislation to tackle BEPS which goes beyond what is recommended in the OECD's BEPS reports?

Greece is expected to follow the OECD recommendations for tackling BEPS.

10.3 Does your jurisdiction support public Country-by-Country Reporting (CBCR)?

Please refer to our answer to question 10.1.

10.4 Does your jurisdiction maintain any preferential tax regimes such as a patent box?

There is a preferential tax regime for shipping companies.

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Ioannis Stavropoulos has been a Managing Partner at Stavropoulos & Partners Law Office since 1991. As a tax consultant and tax attorney, he has dealt with numerous cases concerning the application of double taxation treaties, transfer pricing and EU direct taxation and VAT legislation. A number of his cases constitute leading jurisprudence published in Greek and international legal and tax journals. He has participated in legislative and scientific committees, both as an independent expert and representing various organisations. In 2012–2013 he actively participated, as an expert, in the tax reform committee which produced the new tax codes.

As a business lawyer, Ioannis has taken part in major merger & acquisition projects, domestic and international share and asset transactions, as well as anti-trust cases. He has published articles on various tax issues and has participated as a speaker in numerous seminars. He participates in the Taxation Committee of the American-Hellenic Chamber of Commerce, as well as in tax and legal committees of various Federations and Chambers.

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Vasiliki Koukouloti joined Stavropoulos & Partners Law Office in 2017. She has experience in the provision of tax consultancy services and the representation of domestic and international clients before the tax authorities and the administrative courts in complex tax controversies. She also provides support to companies and individuals in the course of tax audits. She obtained her law diploma from the National and Kapodistrian University of Athens (2010) and an LL.M. in Tax Law from Queen Mary University of London (2012). She is admitted to the Athens Bar Association (2013).

STAVROPOULOS & PARTNERS
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Stavropoulos & Partners Law Office is a partnership of lawyers established in Athens which offers a wide range of legal services, with a particular emphasis on taxation, commercial/corporate law, European Union law, mergers & acquisitions, corporate restructuring, antitrust and dispute resolution. The firm collaborates with law firms in Europe and worldwide, as well as with other professionals such as auditors, accountants, stock brokers, real estate agents, public notaries and judicial bailiffs. The client base consists mainly of multinational companies deriving from Europe and North America and having activities in Greece and the wider Balkan region. The firm consists of ten (10) lawyers, all of whom have national and international academic credentials and are members of the Athens Bar Association.

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