ESG Briefing: Special Edition

Amendments Introduced by Article 57 of Law 5255/2025 to Greek Sustainability Reporting

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A. Introduction

1. Article 57 of Law 5255/2025 on the 'Establishment and operation of the Independent Market Control and Consumer Protection Authority, provisions on the Competition Commission, and other provisions' (**Article 57**) amends sustainability reporting obligations under Law 5164/2024, aligning Greek law with EU Directives 2022/2464/EU (the Corporate Sustainability Reporting Directive or **CSRD**) and 2025/794/EU (the 'Stop the Clock' Directive).

B. Scope

1. The amendments primarily concern:

a. large entities and parent companies of large groups;
b. small and medium size entities (**SMEs**) of public interest;
c. small and non-complex institutions (**SNCIS**); and
d. captive insurance undertakings (large or SMEs of public-interest entities).

C. New Deadlines

1. Article 57 amends the commencement dates so that the phased implementation timeline is as follows:

ENTITY CATEGORY	EFFECTIVE DATE
Large entities of public interest and parent companies of large groups which are of public interest exceeding 500 employees	Financial years beginning on or after **1 January 2024** (remains unchanged)
Other large entities and parent companies of large groups	Financial years beginning on or after **1 January 2027** (previously 1 January 2025)
SMEs of public-interest; SNCIS; captive insurance undertakings (large or SMEs of public-interest entities)	Financial years beginning on or after **1 January 2028** (previously 1 January 2026)
Non-EU undertakings	Financial years beginning on or after **1 January 2028** (remains unchanged)

D. New Transitional Provision for Consolidated Sustainability Reports (New Article 14A)

1. A new Article 14A of Law 5164/2024 introduces a transitional arrangement until 6 January 2030, allowing a subsidiary which is obliged to prepare a sustainability report and whose ultimate parent is not governed by EU Member State law, to prepare a consolidated sustainability report covering all EU undertakings of that group.
2. The subsidiary can benefit from this provision if it achieved the highest turnover in the EU at group level in at least one of the previous 5 financial years on a consolidated basis.
3. This arrangement is treated as equivalent to group-level reporting by the parent undertaking for exemption purposes.

E. Redefining 'Public-Interest Entities'

1. The sustainability reporting obligations stemming from the CSRD were introduced in Greek Law via Article 151 of Law 4548/2018 (the **Company Law**), which imposes these obligations on 'large undertakings, and small and medium-sized undertakings, except micro undertakings, which are public interest companies'.
2. Article 57 restricted the definition of public interest companies included in the Company Law. The new definition now includes the entities referred to in:

a. the Law on Public Enterprises[1], i.e. the companies in which the Greek State has direct or indirect control;
b. the Law on Greek Accounting Standards[2], which defines as public interest companies listed companies, credit institutions, insurance and reinsurance companies and other entities designated as such by the law; and
c. the Law on Corporate Governance of Public Companies[3].

3. The amended definition narrows down the scope of entities subject to sustainability reporting under the Company Law. Namely, financial institutions, such as e-money institutions and payment institutions, are no longer captured by the definition and therefore no longer bear the obligation of sustainability reporting.

4. Article 57 also amends the definition of Public-Interest Entities in the context of the Law on the Statutory Audit of Annual and Consolidated Financial Statements, to align it with the definition included in the Law on Greek Accounting Standards.

F. Broader Exemption Framework for Consolidated Reporting

1. Article 154 of the Company Law is amended to:
a. correct the reference to Article 29a of Directive 2013/34/EU;
b. specify the conditions under which a parent undertaking that is itself a subsidiary may be exempted from consolidated sustainability reporting requirements when it and its subsidiaries are included in the consolidated management report of another undertaking;
c. extend exemptions to subsidiaries of third-country parents which include these subsidiaries in the parent consolidated sustainability report, provided that reporting complies with EU or equivalent standards as determined by an EU implementing act; and
d. apply exemptions to public-interest entities, except large, listed public-interest entities governed by Member State law and whose transferable securities are admitted to trading on a regulated market of any Member State.

[1] Law 3429/2005.
[2] Law 4308/2014.
[3] Law 4972/2022.



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