Immigration Law Briefing: Special Edition

Residence Permits for Executives

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A. Introduction

1. Joint Ministerial Decision No. 216169/2025 (the **Decision**) entered into force on 14 November 2025 and introduces provisions relating to residence permits issued to executives of companies or subsidiaries of foreign companies established in Greece that engage in commercial activities[1].

2. The Decision affects executives applying for residence permits:

a. on the basis of investments of at least €500k as a percentage stake in an unlisted domestic company or as the nominal value of listed securities in a listed domestic company; and

b. as executives of companies with assets or turnovers of at least €4m,

and introduces specific requirements for each category of application and a number of general requirements.

B. Investments in Unlisted Domestic Companies

1. Resident Permit applications by executives investing in unlisted domestic companies must comply with a number of requirements. Participations must:

[1] Article 98 of the Immigration Code.

a. equate to a stake of at least 33% in the company's share capital through registered securities;
b. correspond to a payment by a non-EU citizen of at least €500k; and
c. be made in companies established in Greece which have already closed one financial year prior to the investment being made.

2. Applications must be supported by a certificate from the unlisted domestic company which specifies:
   a. details of the increase in its corporate/share capital in which the non-EU citizen participated;
   b. the number of shares acquired;
   c. the amount paid which must be at least €500k;
   d. the holding of the shares/stocks from the date of acquisition until the date of issuance of the certificate; and
   e. the percentage of participation in the company's capital which must be at least 33%.

C. Investments in Listed Domestic Companies

1. Executives applying for residence permits by investing in domestic companies whose shares are traded on regulated markets or multilateral trading facilities operating in Greece must acquire shares with a nominal value of at least €500k.
2. Applications must be supported by a certificate from an intermediary or credit institution established in Greece which specifies:
   a. details of the personal shares of non-EU citizens in the Dematerialized Securities System (DSS);
   b. details of the company whose securities they have acquired;
   c. the date of purchase and the number of securities; and
   d. the amount paid which must be at least €500k;

   and a confirmation that the specific securities are held at the date of issue of the certificate.

D. Executives

1. The Decision also provides for resident permit applications to be granted to executives of branches of foreign companies or Greek companies that legally conduct commercial activities in Greece with assets or turnover of at least €4m in the last closed financial period.
2. For the purposes of the Decision, executives are defined as members of boards of directors, legal representatives and managers of domestic companies and legal representatives of branches of foreign companies. They must not receive remuneration in this capacity.
3. Applications for residence permits must be supported by:
   a. the published financial statements of the company, accompanied by a Certified Auditor's

Report certifying that the company's assets or turnover amount to at least €4m; and

b. a statement from the company confirming that the executive applying for the permit does not receive remuneration.

E. General Requirements

1. The Decision specifies that recent supporting documents must be filed with the residence permit applications with both the Residence Permits Directorate of the Ministry of Migration and Asylum and the Ministry of Development for the issuance of the required recommendation.
2. Supporting documents filed with the Ministry of Migration must be dated within one month of submission of the application.
3. Supporting documents filed with the Ministry of Development must be dated within three months of the issuance of the recommendation by the Ministry of Migration.

F. Investment Retention Controls

1. The Decision allows for strict control of the retention of the investment with an explicit provision for revocation of the residence permit in cases of non-compliance.
2. Investors are expressly obliged to notify the Foreign Direct Investment Directorate of the Ministry of Development of any changes in the conditions for granting their residence permit within one month of the change, attaching the relevant supporting documents.
3. Failure to comply with this obligation within the specified time limit constitutes grounds for revocation of residence permits.



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