Recent Developments in Tax Legislation

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A. New Tax Law 5355/2026

On 13 November 2026, the Parliament adopted the New Law 5355/2026 (the **Law**) entitled 'Enhancing Disposable Income, Savings and Investments; Tax, Employment and Pension Provisions and Other Social Policy Measures'.

The Law introduces a broad package of tax reforms aimed at reducing the tax burden on individuals and businesses, strengthening disposable income, encouraging savings and investment and supporting economic activity.

An overview of the key changes introduced by the Law follows.

B. Amendments Relating to Income Taxation

1. **Accelerated Depreciation Regime for Machinery and Equipment:** The Law amends the depreciation rates provided under Article 24 of the Greek Income Tax Code[1] for machinery and equipment (excluding computers and software). The existing uniform depreciation rate of 10% is replaced with a progressive depreciation schedule (see table below) resulting in the assets depreciating fully within 6 instead of 10 years. The new rules apply to qualifying fixed assets acquired from 2027 tax year onwards.

[1] Law 4172/2013 – **ITC**

Tax Year of Use	Years 1 & 2	Years 3 & 4	Years 5&6
Depreciation Rate	10%	15%	25%

2. **Increased Taxation of Profit-Based Remuneration Exceeding €60k:** Remuneration distributed from the profits of legal entities to members of boards of directors, managers and personnel will be subject to a 15% tax rate, instead of the current 5%, on the portion exceeding €60k per tax year. The corresponding withholding tax provisions of Article 64 of the Greek Income Tax Code have been amended accordingly. The measure applies to payments made as of 1 January 2027.
3. **Tax Exemption for Gratuities Increased to €6k Annually:** As of the 2026 tax year, the tax-exempt threshold applicable to gratuities (tips) received by employees from customers, including gratuities received by delivery personnel through digital platforms, is increased from €300 per month to €6k per tax year.
4. **Reduction of Advance Income Tax for Individuals:** The advance income tax (tax prepayment) imposed on income derived from individual business activity is reduced from 55% to 50%. The reduced rate will apply to advance tax assessed through the income tax return of the 2027 tax year.

C. Extension of Real Estate Related Income Tax Incentives Until 31 December 2027

1. **Suspension of Capital Gains Tax on Real Estate Transfers:** This has been further extended until 31 December 2027.
2. **Extension of Tax Exemption for Long-Term Leasing of Previously Vacant Properties:** The three-year income tax exemption applicable to owners who lease previously vacant properties under long-term lease agreements is extended to agreements concluded up to 31 December 2027.
3. **Extension of Tax Credit for Building Upgrades:** The income tax reduction provided under Article 39B of the ITC for expenses relating to energy, functional and aesthetic upgrades of buildings is extended for qualifying expenses incurred until 31 December 2027.
5. **Extension of VAT Suspension on Transfers of Newly Constructed Buildings:** The suspension of VAT on supplies of newly constructed real estate is extended until 31 December 2027.

D. Gradual Abolition of the Annual Business Levy (Business Tax)

Tax Year	Status
2026	No business levy will be imposed on registered offices and branches located outside the Region of Attica, including entities established in the Regional Unit of the Islands of Attica.
2027	The levy is reduced by 50% for establishments located within the remaining geographical area of Attica.
2028	The business levy is fully abolished.

E. Amendments Relating to Real Estate Taxation

1. **Unified Real Estate Ownership Tax (ENFIA):** The full exemption from ENFIA applicable to the principal residence of individuals located in qualifying small settlements is expanded as of the 2027 tax year. Specifically, the population threshold is increased from 1,5k to 2k inhabitants for settlements located outside the Region of Attica (excluding the Regional Unit of the Islands of Attica) and from 1,7k to 2,2k inhabitants for settlements located in Western Macedonia and border regional units.

2. **Increased Real Estate Transfer Tax for Non-EU/EEA Tax Residents:** A significant increase in the real estate transfer tax rate from 3% to 15% is introduced for acquisitions of residential property by individuals who are tax residents of countries outside the European Union and the European Economic Area. This applies exclusively to acquisitions of residential property by non-EU/EEA tax residents and applies to notarial deeds executed from 1 July 2027.

F. Cryptocurrency Taxation Framework Introduced by Law 5354/2026

1. **Taxation of Capital Gains Derived from Crypto-Assets:** Law 5354/2026 (the **New Law**) introduces for the first time a specific income tax framework governing gains derived by individuals from the disposal of crypto-assets[2]. For the purposes of the new regime, a taxable disposal occurs upon:

   a. the exchange of crypto-assets for fiat currency;
   b. the use of crypto-assets as consideration for the acquisition of goods or services; and
   c. any other transfer for consideration, including contributions of crypto-assets against the issuance of shares, quotas or other participation rights in a legal entity.

   The exchange of one crypto-asset for another does not constitute a taxable event. The taxable capital gain is calculated as the difference between the transfer value and the acquisition cost of the crypto-asset, taking into account directly related acquisition and disposal expenses. In cases involving multiple acquisitions of the same crypto-asset, the

[2] through the insertion of new Article 42B ITC

average acquisition cost method applies. The resulting net gain is subject to income tax at a rate of 10% and an annual net capital gain not exceeding €500 is exempt from taxation.

Interest now also includes income from crypto-asset lending (crypto lending), providing liquidity or yield to decentralized protocols (DeFi liquidity provision and yield farming) and committing (staking) cryptocurrencies in transaction-validation mechanisms (staking or forging). If interest is payable on crypto-assets, it is calculated with reference to its value at the time of the transaction.

2. **Cryptocurrency Transactions, Presumptive Expenditure Rules and In-Kind Benefits:** The acquisition of crypto-assets is expressly added to the list of asset acquisitions constituting a presumptive expenditure under Article 32 ITC. The New Law excludes crypto-assets from the quantitative criterion under which three homogeneous transactions within a six-month period may trigger characterization as a business activity.

   Where crypto-assets are granted to employees, shareholders, partners or other beneficiaries as remuneration or as a benefit in kind, their taxable value corresponds to their fair market value in Euro at the time of transfer.

3. **Crypto-Assets as Foreign Intangible Movable Property:** The New Law incorporates crypto-assets into the Greek Code on Inheritance, Gift and Parental Grant Taxation as a category of intangible movable property located abroad. For inheritance, gift and parental grant tax purposes, the taxable value is determined by reference to the Euro-denominated market value of the crypto-assets on the day preceding the taxable event, based on prices quoted by recognized trading platforms. The value subjected to or exempt from tax is subsequently carried over and treated as the acquisition cost in the hands of the recipient, thereby ensuring continuity of the tax basis.

4. **Exemption from Digital Transaction Duty:** Transactions involving crypto-assets are excluded from the scope of the Digital Transaction Duty for disposals occurring on or after 1 December 2024. Historical uncertainty regarding stamp duty treatment is retrospectively resolved for the period from 1 January 2021 to 30 November 2024.

5. **Twelve-Month Compliance Window:** A transitional voluntary disclosure mechanism is introduced to facilitate the regularization of historical crypto-asset income. Individuals are granted a period of twelve months from the entry into force of the New Law to disclose previously undeclared capital gains from crypto-asset disposals and income derived from crypto lending, yield farming, liquidity provision and staking activities.

   Capital gains are calculated in accordance with Article 42B ITC and taxed at 10% and DeFi-related returns are treated as interest income and taxed at 15%. The corresponding tax must be paid within sixty days following the submission of the disclosure. Provided that payment is effected within the prescribed deadline, no tax penalties or late payment interest under the Code of Tax Procedure are imposed.



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