

Prooptiki was established as an accounting firm back in 1984; today, it is one of the most successful companies in the economic sector, providing consultation on accounting-tax and payroll issues.

Prooptiki's clientele lists a wide range of economic sectors, such as tourism, hotels, commerce, service provision, IT, telecom, real estate management, etc.



SERVICES OFFERED BY PROOPTIKI SA

- **Accounting:** A full range of accounting support in accordance with the Greek GAAP and IFRS.
- **Tax Consulting:** A full range of tax services to cover all tax fields. Our Goal is to have the maximum benefits, with the minimum tax liabilities and risks, always in strict compliance with local legislation and Code of Books and Records.
- **Payroll:** Complete solutions in managing and issuing the payroll, full support as far as the obligations towards government funds are concerned and continuous and updated information on Labor Law/ Insurance issues
- **Business Consultancy:** We can assist you on aspects such as:
 - ◆ Entity set up. Together we can find the most suitable structure for your business (limited company, partnership, sole trader, limited by shares company), or set up a branch of a foreign company.
 - ◆ Business plans and cash flow forecasts
 - ◆ Business and management advice
 - ◆ Human resources consultancy
 - ◆ Provision of management information
 - ◆ Tax compliance and advise
- **Auditing:**
 - ◆ Internal audits, Management audits, Compliance audits
 - ◆ Cash flow, Due diligence, Financial Statements, Special audits.

Digital application for inclusion in the special taxation regime for employment income and business activity (Article 5C of the Income Tax Code)

The Independent Authority for Public Revenue (AADE) now provides the option for individuals who transfer their tax residence to Greece to submit **digitally** their application to be included in the **special taxation regime** for income from **employment and business activity**.

If the assumption of employment or the commencement of business activity took place:

- **By 2nd of July (inclusive)**, the application must be submitted **by the end of the same year** in order to be included in the special taxation regime for that year.
If the application is submitted **within the following year** after the start of employment or business activity, it will be examined for inclusion **for the next tax year**.
- **After 2nd of July**, the application must be submitted **by the end of the following year** and applies to the taxpayer's inclusion **for the year following** the start of employment or business activity.

The individual must cumulatively meet the following conditions:

- They must **not have been a Greek tax resident for 5 out of the 6 years** prior to transferring their tax residence to Greece.
- They must transfer their tax residence from an **EU or EEA Member State**, or from a country with which Greece has a **valid administrative cooperation agreement** in tax matters.
- They **must provide services in Greece under an employment relationship** (Article 12(2) of the Income Tax Code), either to a Greek legal entity or to a **permanent establishment of a foreign company in Greece**, or must carry out an **individual business activity** in Greece.
- They must declare that they will **remain in Greece for at least two years**.

Once the above conditions are verified, the **decision granting inclusion** is issued immediately. In cases where verification through supporting documents is required, applicants may **upload the necessary documents digitally** for review by the competent authority.

It is noted that for the **digital issuance of the decision** on whether or not a person is included under Article 5C of the Income Tax Code, the individual's personal data must be up to date, as these details are also used by AADE for communication purposes.

Taxpayers who submitted an application for inclusion in the special tax regime **via the "My Requests" platform for the year 2025**, which remains pending, may **resubmit it through the new application** so that it can now be processed digitally, provided that the conditions are met.

How to apply

Applications are submitted via the **myAADE digital portal** (mayaade.gov.gr) by following:

Applications → Tax Services → Income → Application for inclusion in the special taxation regime (Article 5C of the Income Tax Code).

Law 5239/2025 has been published in the Government Gazette (FEK A' 178 / 17-10-2025). The Law includes several important provisions:

- **The explicit time reference in individual employment contracts** (daily, weekly, fortnightly, or monthly) is abolished, since the duration of a part-time employment contract may be **any period agreed in writing by the parties**, as well as the obligation to notify the Labour Inspectorate of written part-time or rotational work contracts.
- **The possibility of overtime in rotational employment** is introduced.
- **The annual allowable overtime hours** may now be distributed from the former **three (3) hours up to four (4) hours per day**, without changing the **annual cap of 150 overtime hours**.
- **Matters relating to the splitting of annual leave** are regulated.
- **Parental leave allowance** is defined as **tax-exempt, non-assignable, and non-seizable** by the State or third parties, notwithstanding any contrary provision, and **it is not included in total family income**.
- **Article 291 of Presidential Decree 62/2025** (protection of maternity against termination of employment) is extended to apply also to:
 - employees who **adopt a child up to eight (8) years old** (previously up to six (6)), and
 - employees who become **foster parents** of a child up to eight (8) years old.
- The following are **redefined**:
 - the **procedure for notifying voluntary resignation** of an employee,
 - the **period of employee absence** after which termination of the employment contract by the employee is presumed,
 - the **deadline for the employer** to report the employee's voluntary resignation in the **ERGANI II Information System**.
- Employees are now allowed to **report their own voluntary resignation directly in ERGANI II**.
- The following are specified:
 - as a **unilateral harmful change** to the terms of employment: any **unjustified reduction by the employer of any type of remuneration** due to the employer's inclusion in, or application of, the **digital work card system**,
 - as **invalid**, the **termination of employment by the employer** if the employee **refuses to perform overtime work**.
- The employer's obligation to **keep printed documents at the workplace** (individual employment terms, leave register, payroll statements) is abolished. Consequently, failure to keep these documents **no longer constitutes a labour law violation** subject to administrative penalties.
- **Failure to post the staff table and working hours schedule** is removed from the list of directly provable labour law violations subject to administrative penalties.

- The **data submitted to ERGANI II** for labour market control purposes are redefined.
- Employees are granted **access to all data concerning their employment relationship** recorded in ERGANI II.
- A **special electronic application** is created through which every employer can use **ERGANI II**.
- The **procedure for declaring the commencement of employment and changes to employment terms** in ERGANI II is revised.
- **Administrative penalties** are provided for employers who fail to comply with the **employment commencement declaration procedure**.
- A special electronic application called "**Fast-Track Hiring**" is created for the declaration of fixed-term employment in cases of **urgent employer needs**.
- The **procedure for hiring and employee acceptance** is specified.
- **Administrative penalties** are imposed for employing workers in breach of the **mandatory publication and notification obligations**.
- The provisions concerning the **electronic working-time recording system using the digital work card** are amended and supplemented. In particular:
 1. Employees are given the possibility of **flexible arrival times**, under specific conditions.
 2. The following are defined:
 - the **time points for stamping the digital card** in businesses in the specified commercial sectors,
 - the **preparation time** of employees before starting work or before leaving.
- The **Labour Inspectorate** may impose **administrative penalties** if an employee is employed **during the preparation time**.

Clarifications on the implementation of the digital transaction duty (stamp duty)

On **12 November 2025**, the Independent Authority for Public Revenue (AADE) published **Circular E.2094/2025**, which provides clear guidance on the implementation of the **Digital Transaction Duty (DTD)**.

Key points of the Circular:

- **Stamping of documents** falling under the DTD is **no longer required**.
- The **principle of "territoriality" is abolished**: it no longer matters where the contract was concluded or signed — if **at least one of the contracting parties has tax residence or a permanent establishment in Greece**, the duty applies.
- The **declaration and payment** of the duty are carried out **digitally via the AADE platform**.
- **Filing deadline**: the DTD must be declared **by the last day of the month following** the month in which the transaction took place.

Which transactions are subject to the DTD — and which are exempt

Transactions subject to the DTD

- **Commercial leases of real estate** (when VAT is not chosen).
Rate: 3.60% of the rent.
- **Leasing of storage areas or business premises** (warehouse, parking space) when leased for business use.
- **Loans, financial transactions, credit transfers, and inter-company or private credits**, under certain conditions (e.g. not all loans; exclusions apply, such as bond loans).
- **Certain corporate capital movements**, withdrawals, deposits, and cash facilities, under specific conditions and where there is no special agreement or where amounts exceed the profit share.
- **Acts before Land Registry or Cadastre offices**, such as:
 - Registration of a **lease longer than 9 years** (fixed duty of 1.20% on total rents),
 - **Registration of a mortgage** or conversion of a pre-notation of mortgage (rate 3.60%).

Exemptions / Transactions not subject to the DTD

- **Residential leases for private use** (i.e., when a dwelling is rented without business use).
- **Leasing of a residence together with a storage room or parking space** as part of the same residential lease — these are **not subject** to the DTD.
- **Transactions subject to VAT** — no DTD is charged on these.
- **Transfers of real estate** — these are not subject to DTD because they are subject to other taxes (e.g. transfer tax).
- **Transactions subject to withholding and payment of another tax**, or where the duty is already included in the main obligation — these are **exempt from a separate DTD declaration**.

Who is liable and how it is declared

1. The **liable party** may be, depending on the case: an **individual**, a **legal entity**, a **public body**, or a **general government entity**, depending on who is involved in the transaction.
2. **Declaration and payment** of the duty are made **digitally via the AADE platform, by the last day of the month following** the month in which the transaction took place.
3. For **administrative acts** (such as permits, licenses, etc.) that carry a **fixed duty**, the duty must be **paid before the act is issued**, via the **e-paravolo (electronic fee system)**.

New Tax Law (Law 5246/2025)

Title: “Tax Reform for Demographics and the Middle Class – Support Measures for Society and the Economy”

Changes to Personal Income Tax

- **Reduction of tax rates** and introduction of a **new income tax scale** for salaries, pensions, and professional income as of **1st of January 2026**.
- **Lower basic tax rates**, particularly benefiting **middle-income earners**.
- **Special incentives for families with children and young workers** (e.g., **zero taxation on low incomes** for young people up to **25 years of age**).

Real Estate and Rental Income Taxation

Taxation of Rental Income

- **Rental income from residential properties** leased for at least **three (3) years** (up to **120 sq.m.**, with the possibility of larger surface area for families) is **exempt from income tax for 36 months**, subject to conditions.

New Tax Bracket for Rental Income

- An **intermediate tax bracket** is introduced for **income from real estate**.

ENFIA and VAT

- **Gradual reduction and/or abolition of ENFIA** (property tax) for **primary residences in small settlements**.
- **Extension of the VAT suspension** on **newly constructed buildings** for **2026**.
- **30% reduction in VAT** in **selected island and border regions** (e.g. **North Aegean, Dodecanese, Evros**) for **goods and services**.

Deemed Income and Objective Expenses

- **Reduction of deemed expenses for residences (30–35%), passenger cars, and boats.**
- **Abolition of deemed net income for dependent children** who have their own income.

Business Incentives and Investments

- Introduction of a **“super-deduction” regime** allowing businesses to **deduct up to 200% of eligible investment expenses** (subject to limits), especially for **strategic sectors** such as **defence and vehicle/aircraft manufacturing**.