

Greece

Summary of CbC Reporting and Transfer Pricing Documentation Rules

Country-by-Country Report

- Effective Date: Fiscal years beginning on or after January 1, 2016.
- Filing Threshold: Greek MNEs with annual consolidated group revenue exceeding €750 million in the previous fiscal year.
- Local Filing: A Greek tax resident must file a CbC report if certain conditions are met.
- Information Reported: Generally consistent with the OECD guidance.
- Language: Greek or any other officially accepted language of the EU.
- Forms/Filing Instructions (see [Country-by-Country reporting \(CBC\)/DAC4 website](#)):
 - CbC Notification of Reporting Entity: submitted electronically via the tax administration website.
 - CbC Report: submitted electronically via the tax administration website.
- Deadline for Filing Notification of Reporting Entity: By the last day of the relevant fiscal year.
- Deadline for Filing CbC Report: Within 12 months after the end of the relevant fiscal year.
- Penalties: A penalty for non-filing of the CbC report of €20,000 and for inaccurate or late filing of the CbC report of €10,000 may apply.
- Exchange of Information
 - MCAA CbC: signed.
 - EU Directive 2016/881: enacted.
 - U.S. CAA CbC: signed.

For a schedule of CbC report and CbC notification deadlines (by country), please see [CbC Reporting Deadlines](#).

Public Country-by-Country Report ([Law 5066/2023](#))

- Effective Date: Financial years beginning on or after June 22, 2024.
- Reporting Threshold:
 - Greek MNEs (or a Greek stand-alone company) with consolidated revenue exceeding €750 million in each of the last two consecutive financial years (and active in at least one other tax jurisdiction).
 - Non-EU MNEs with a “medium” or “large” subsidiary¹ in Greece with consolidated revenue exceeding €750 million in each of the last two consecutive financial years (or a non-EU corporation with a branch in Greece and the revenue of the Greek branch exceeds €8 million in each of the last two consecutive financial years).²

¹ See Law 4308/2014, Art. 2 (para. 5 and 6) for the definition of medium and large enterprises.

² In general, this provision does not apply if the non-EU MNE (or non-EU corporation) has a statement of income tax data that (i) is publicly available and free of charge on its website; (ii) is issued in one of the official EU languages; (iii) is published within 12 months of the closing date of the balance sheet for the reporting financial year; and (iv) contains certain identifying information regarding relevant enterprises.

- Greek subsidiaries or branches established for the sole purpose of circumventing the EU public CbC reporting requirements.

Consistent with the EU directive, credit institutions and investment firms established in Greece that are already subject to separate reporting under EU Directive 2013/36 are exempt from this reporting obligation, if the report includes information about all activities of the enterprise and associated enterprises included in consolidated financial statements.

- ***Information Reported and Presentation of Information:*** The information reported, as well as the presentation of the information, is consistent with the EU directive. A common template and machine-readable electronic reporting format will be provided.

Consistent with the EU directive, the information reported includes the name of the company, financial year in question and currency used; a brief description of the nature of the business activities; number of full-time employees; net revenue; profit or loss before income tax; income tax accrued; income tax paid; and accumulated earnings. An entity may report the information reported in the CbC report (under EU directive 2016/881) instead. The reasons for any significant discrepancies between the amount of income tax accrued and income tax paid must be presented in the report.

In addition, the data is disclosed (i) separately for each EU member state; (ii) separately for each country listed on the EU list of non-cooperative jurisdictions (i.e., “blacklist”) on March 1 of the relevant financial year or listed on the “grey list” on March 1 of the relevant financial year and on March 1 of the previous financial year; and (iii) aggregated for the rest of the world.

- ***Publication and Accessibility:*** The report (prepared in Greek or English) must be published in the General Commercial Register ([G.E.M.I.](#)), where it will remain publicly accessible indefinitely. A notice referencing the publication in the General Commercial Register must be posted on the reporting entity’s website.
- ***Publication Deadline:*** The report must be published within 12 months of the closing date of the balance sheet for the reporting financial year.
- ***Deferral:*** The law does not include the safeguard clause (which would have allowed the temporary omission of certain information if the disclosure of such information could seriously damage the commercial position of the companies to which the report refers).
- ***Audit Requirement:*** If an audit report of the financial statements of the reporting entity is required, it must include a statement whether a CbC report was required to be published (for the preceding financial year) and, if so, if the report was published in accordance with the rules.
- ***Penalties:*** Penalties ranging from €10,000 to €100,000 may apply for noncompliance.

Master File

There are no OECD Master File requirements in Greece.

Local File

There are no OECD Local File requirements in Greece.

Transfer Pricing Documentation

Transfer pricing documentation is required for taxpayers who meet the following thresholds: (i) total value of intercompany transactions greater than €100,000 and turnover equal to or less than €5 million per

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year or (ii) total value of intercompany transactions greater than €200,000 and turnover greater than €5 million per year. The documentation consists of information related to the Group (Master File) and information related to the local entity intra-group transactions (Greek Documentation File). The documentation must be prepared by the filing deadline of the corporate income tax return and submitted within 30 days of a request by the tax authority. The documentation should be submitted in the Greek language; however, for a foreign multinational group, the Master File can be maintained in English (or another internationally accepted language) with an obligation to be translated into Greek within 30 days of a request by the tax authority. Penalties may apply for non-compliance.

Transfer Pricing Disclosure ([Intragroup Transactions website](#))

Companies must electronically submit a Summary Information Table of their intercompany transactions to the tax administration by the deadline for filing the corporate income tax return. The Summary Information Table contains information regarding the group they belong to, the functions performed, and the risks assumed, as well as a short description of the transfer pricing documentation method adopted. Penalties may apply for non-compliance.