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Tax

Law 5355/2026: Key Tax Developments in Greece

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Law 5355/2026: Key Tax Provisions

Law 5355/2026 was published in the Government Gazette on 13 November 2026. It introduces a broad package of tax measures affecting individuals, businesses, and real estate ownership and transactions.

Set out below is an overview of the key tax developments.

Tax treatment of profit-based remuneration

Remuneration of any form, paid from the **profits** of legal persons or legal entities to (a) members of the board of directors, (b) managers and (c) employees of such legal persons/entities is subject to 5% dividend withholding tax, for amounts up to EUR 60,000 **per tax year**. Any amount above this threshold is **subject to a 15% withholding tax**. These tax rates apply to remunerations paid on or after **1 January 2027**.

Increased real estate transfer tax for non-EU/EEA tax residents

The new provisions introduce a **15% real estate transfer tax ("*RETT*") rate**, instead of the standard 3% rate, on acquisitions of residential properties acquired by individuals who are **tax residents outside the EU and EEA**.

Tax residency is assessed at the time the tax liability arises. Depending on the type of transaction, the tax liability arises on:

- **the date of signing the notarial preliminary agreement,** provided that the final contract is executed within two (2) years;
- **the date of registration** with the Cadastral Office/Land Registry, in cases involving certain court decisions;
- **the date of the auction report,** for transfers following a **compulsory or voluntary auction**; or
- **the date of signing the final contract**, in all other cases.

Accordingly, third-country nationals who are tax residents in EU/EEA countries at the time the tax liability arises, do not fall within the scope of the 15% RETT rate. The increased rate applies to **final** purchase agreements **executed on or after 1 July 2027**.

The increased RETT rate does not apply to individuals who permanently reside in Greece, or intend to relocate to Greece, and who are, among others: (a) Greek nationals; (b) nationals of EU and EEA member states; or (c) third-country nationals with long-term resident status in Greece.

Extension of the suspension of capital gains tax on transfers of Greek real estate

The suspension of the imposition of 15% capital gains tax on transfers of Greek real estate by individuals is extended until **31 December 2027 (previously 31 December 2026)**. Capital gains tax on transfers of Greek real estate by individuals has never been applied, as its suspension has remained continuously in force since the introduction of the relevant provisions.

Extension of the Suspension of VAT on Newly Built Properties

The application of VAT to newly constructed buildings is compulsorily suspended until 31 December 2027, following submission of an application by the taxable person (property developer). Instead, real estate transfer tax (RETT) is imposed.

Reduction of advance income tax for individuals carrying on individual business activities

The advance income tax payable by individuals deriving business income is reduced from **55% to 50%** of the income tax arising from such activities. The reduced rate will apply to the advance tax assessed for tax year 2027 and subsequent tax years, starting with the income tax return for tax year 2027, which is filed in 2028.

Reduced income tax for taxpayers with three dependent children

A **zero-tax rate for the first two income brackets, up to EUR 20,000** is introduced for taxpayers with **three (3) dependent children**, with effect from tax year 2027.

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