Legal 500
Country Comparative Guides 2026

Greece
Transfer Pricing

Contributor

Dryllerakis Law Firm

John Papadakis

Partner | jp@dryllerakis.gr

Nikos Kalantzis

Junior Associate | n.kalantzis@dryllerakis.gr

This country-specific Q&A provides an overview of transfer pricing laws and regulations applicable in Greece.

For a full list of jurisdictional Q&As visit **legal500.com/guides**

Greece: Transfer Pricing

1. What is the legal framework (legislation, regulations or administrative guidance) governing transfer pricing in your jurisdiction?

The Greek transfer pricing framework is principally set out in the Greek Income Tax Code, enacted by Law 4172/2013 ("ITC"), and the Greek Tax Procedure Code, enacted by Law 5104/2024 ("TPC"), each as amended and in force.

Article 2(g) ITC defines the persons that are considered associated for Greek tax purposes. Article 50 ITC establishes the arm's length principle for both domestic and cross-border transactions between associated persons, expressly providing that the Greek transfer pricing rules must be applied and interpreted in accordance with the general principles and the OECD Transfer Pricing Guidelines. Article 51 ITC contains separate rules concerning business restructurings and transfers of functions.

The principal procedural and compliance provisions are contained in Articles 25 and 26 TPC. Article 25 regulates the obligation to prepare and maintain transfer pricing documentation, comprising, as applicable, a Master File and a Greek Local File, and to submit a Summary Information Table. It also establishes the applicable documentation thresholds, preparation deadlines and the obligation to provide the documentation file to the tax administration within 30 days of a request. Article 26 TPC governs Advance Pricing Agreements ("APAs"), including unilateral, bilateral and multilateral APAs concerning specified future cross-border transactions. The transfer pricing documentation and filing penalties are principally contained in Articles 55 and 56 TPC.

The detailed content of the transfer pricing documentation, the recognised transfer pricing methods, the conduct of the comparability analysis and the determination of the arm's length range are principally regulated by Decision POL.1097/2014, as amended by Decision POL.1144/2014, together with Decision POL.1142/2015 and subsequent interpretative guidance issued by the Independent Authority for Public Revenue ("IAPR"). The procedural rules applicable to APAs are further set out in AADE Decision A.1107/2023.

Country-by-Country Reporting ("CbCR") is governed by Law 4170/2013, as amended in particular by Law 4484/2017, which implemented Directive (EU) 2016/881 ("DAC4"), and by the relevant provisions of Law 4490/2017. The filing and exchange procedure is further regulated by Decision POL.1184/2017, as amended and in force. Transfer pricing rules under Pillar II have been already established under Law 5100/2024.

In cross-border cases, Greece's double tax treaties, in particular their associated-enterprises and mutual-agreement provisions, are also relevant. Transfer pricing disputes may be addressed through the applicable treaty Mutual Agreement Procedure, the EU Arbitration Convention, ratified in Greece by Law 2216/1994, or the EU tax dispute-resolution mechanism implemented by Articles 21–48 of Law 4714/2020. The relevant administrative procedures are supplemented by IAPR Decisions A.1226/2020 and POL.1129/2017.

2. To what extent are the OECD Transfer Pricing Guidelines incorporated into or relied upon in your jurisdiction?

Greece has formally incorporated the OECD Transfer Pricing Guidelines ("OECD TP Guidelines") into domestic law by an explicit reference, which has included in Article 50 ITC. In that respect, Greek administrative courts have in several decisions referred to the OECD TP Guidelines as supplementary interpretive material, particularly in the absence of specific domestic provisions on a given topic. In practice, the OECD TP Guidelines are routinely cited in tax audits and litigation, and deviations from them require strong justification.

3. How are "related parties" and "control" defined in your jurisdiction, and how do these concepts affect the application of the arm's length principle and the scope of the transfer pricing rules?

The definition of related parties determines the scope of the arm's length principle: only transactions between related parties as defined above are subject to the transfer pricing rules and documentation requirements.

To that effect, Article 2(g) ITC defines an associated person broadly by reference to participation, common ownership and effective influence. Persons are

 © 2026 Legalease Ltd

associated where: (i) one person directly or indirectly holds at least 33% of the shares, units, capital, profit entitlement or voting rights of another; (ii) the same person directly or indirectly holds at least 33% of those rights in two or more persons; or (iii) there is direct or indirect substantial administrative dependence or control, decisive influence, the ability to exercise decisive influence, or both persons are subject to such dependence, control or influence by a third person.

The decisive-influence limb is, therefore, facts-and-circumstances based and may capture arrangements in which one person can materially determine another person's commercial or financial policy, even if no formal majority interest exists.

4. Do transfer pricing rules apply to both cross-border and domestic transactions?

Yes. Article 50 ITC expressly applies to one or more international and domestic transactions between associated persons. Greek transfer pricing is therefore not confined to transactions that shift profits outside Greece.

The rules also extend to dealings between a Greek permanent establishment of a foreign enterprise and its head office or associated foreign enterprises, and to dealings between a Greek legal person or legal entity and a foreign permanent establishment maintained by it. Article 25 TPC expressly subjects those dealings to the documentation rules, subject to the applicable thresholds and exemptions.

The distinction between domestic and cross-border transactions is nevertheless relevant procedurally. Treaty-based corresponding relief, a bilateral or multilateral APA, the Mutual Agreement Procedure, the EU Arbitration Convention and the EU tax dispute-resolution mechanism are relevant principally to cross-border double taxation. For domestic adjustments, Article 50(1A) ITC permits a corresponding amendment by the other Greek associated entity following a tax audit adjustment of the first Greek entity, provided the statutory procedure and supporting audit report requirements are met.

5. Are there any exemptions or exclusions from the transfer pricing rules in your jurisdiction (for example, for small and medium sized enterprises, specific transaction types, or materiality thresholds)?

There is no general exemption from the substantive arm's length principle for small or medium-sized enterprises. The principal reliefs concern documentation rather than pricing.

Under Article 25(2) TPC, a taxpayer is exempt from preparing a transfer pricing documentation file and filing the Summary Information Table where the aggregate annual value of the relevant controlled transactions and transfers of functions does not exceed:

(i) EUR 100,000, if the taxpayer's annual turnover does not exceed EUR 5 million; or

(ii) EUR 200,000, if annual turnover exceeds EUR 5 million.

Commercial and industrial companies established under Mandatory Law 89/1967, and companies or branches subject to the same special regime, are expressly exempt from the documentation obligation (see, to that effect, POL.1093/2015). However, these exemptions do not necessarily remove arm's length exposure for a taxable Greek legal person transacting with such a counterparty.

Country-by-country reporting is subject to the separate EUR 750 million consolidated group revenue threshold and its own local-filing, notification and exchange rules. Greece has no broad transaction-type exclusion for services, financing, royalties, tangible goods or restructurings.

6. Are there any notable deviations from OECD principles in local law or practice?

Greek law largely follows the OECD framework, but several local features are significant.

First, Greece applies a prescribed interquartile-range methodology whenever a range results from the method and comparable data. The statutory-administrative approach mechanically excludes the lowest and highest quartiles and prescribes the calculation positions and interpolation method. This is more prescriptive than the OECD's fact-dependent range analysis.

Second, Greece applies transfer pricing rules to domestic as well as cross-border transactions and uses a 33% association threshold together with a broad decisive-influence test.

Third, Greek law contains no specific domestic regimes for hard-to-value intangibles, low value-adding intra-group services, financial transactions, cost contribution arrangements or secondary adjustments. Those subjects are addressed through Article 50 and the OECD Guidelines.

 © 2026 Legalease Ltd

Finally, Amount B has not yet been implemented domestically, and there are no general transfer pricing safe harbours.

7. What transfer pricing methods are recognised under local law?

The five OECD-recognised methods are accepted under POL.1097/2014, as amended: (i) the comparable uncontrolled price (CUP) method; (ii) the resale price method; (iii) the cost plus method; (iv) the transactional net margin method (TNMM); and (v) the transactional profit split method.

The method must be applied to the accurately delineated transaction and selected by reference to a functional analysis, i.e. to the functions performed, to the assets used and risks assumed, to the nature of the transaction, to the availability and reliability of comparable data and the degree of comparability. Internal comparables should be considered where available, although there is no rule requiring their automatic use.

For intangibles or other transactions for which ordinary comparable data are unavailable, OECD-consistent valuation techniques, discounted cash-flow analysis or other financial valuation tools may be relevant. They are not expressly listed as independent statutory methods and must be supported by reliable assumptions, forecasts and sensitivity analysis.

The tax authority may reject a method where another method provides a materially more reliable arm's length result.

8. Is there a prescribed hierarchy or priority among the transfer pricing methods?

There is no strict statutory hierarchy. Greek guidance follows the OECD 'most appropriate method' standard, and the selection depends on the facts and circumstances of the controlled transaction.

Traditional transaction methods (i.e. CUP, resale price and cost plus) are generally preferred where they can be applied with the same degree of reliability as a transactional profit method. In particular, a reliable CUP is ordinarily preferred because it compares the price of the controlled transaction directly.

The profit split method is particularly relevant where both parties make unique and valuable contributions, conduct highly integrated operations or share economically significant risks that cannot reliably be evaluated separately.

TNMM is commonly used for routine distributors, manufacturers or service providers where one party can be selected as the tested party and reliable net-margin comparables are available.

The taxpayer should document why the selected method is more reliable than realistic alternatives. The tax authority should not replace the taxpayer's method merely because another method is possible; it should demonstrate that the alternative produces a more reliable arm's length result after proper delineation and comparability analysis.

9. How are arm's length ranges determined in your jurisdiction, and do domestic tax rules, guidelines, or case law prescribe specific statistical methodologies or calculation approaches for interquartile ranges?

Where the selected method and comparable data produce a range of prices or profit indicators, Greek administrative rules prescribe the interquartile range. The observations are sorted in ascending order and the lowest 25% and highest 25% are excluded. Any result from the first quartile (Q1) up to and including the third quartile (Q3) is treated as arm's length, provided the taxpayer adequately explains the selected point.

POL.1142/2015 prescribes the statistical calculation. For a series of n observations, where n must exceed five: Q1 is located at (n+1)/4; the median (Q2) at (n+1)/2; and Q3 at 3(n+1)/4. If the calculated position is not an integer, linear interpolation is used between the observations immediately below and above that position.

The use of a range does not cure weaknesses in the comparable set. The taxpayer must first establish that the observations are sufficiently comparable and that material differences have been eliminated or reliably adjusted. A full range may remain relevant where all observations are equally reliable, but Greek practice ordinarily applies the prescribed interquartile range. A tested result within the range should not be adjusted without a transaction-specific reason. A result outside the accepted range creates adjustment exposure; the adjustment point must still be reasoned and should not be selected mechanically without considering the reliability of the range and the facts of the transaction.

10. To what extent are comparability

 © 2026 Legalease Ltd

adjustments permitted in your jurisdiction, and which types of adjustments are most commonly applied or rejected by tax authorities?

Comparability adjustments are permitted but are not automatically required. POL.1097/2014 and the OECD Guidelines allow an adjustment where it improves the reliability of the comparison and can be calculated with reasonable accuracy. The taxpayer must explain the identified difference, its expected effect on price or profitability, the calculation method and why the adjustment increases rather than reduces comparability.

Greek auditors generally scrutinise adjustments that are broad, one-sided, unsupported by contemporaneous data or designed merely to bring the tested result into the interquartile range. Adjustments for exceptional costs, market penetration, economic downturns, location savings or group synergies are vulnerable where the taxpayer cannot show that independent enterprises would have priced the relevant factor or where the methodology double-counts the effect. No published administrative rule creates a closed list of accepted or prohibited adjustments; reliability under the OECD comparability standard is, thus, decisive.

11. What rules apply to year end transfer pricing adjustments in your jurisdiction, particularly in relation to statutory accounting requirements and their recognition for tax purposes?

Greek law does not contain a stand-alone transfer pricing provision requiring year-end adjustments, but year-end adjustments are permitted where they produce an arm's length outcome.

For accounting and tax purposes, the adjustment should be recognised in the correct financial period under the Greek Accounting Standards (Law 4308/2014) or the applicable IFRS framework, recorded in the statutory books and supported by appropriate invoices, credit notes, accruals and calculations. The general deductibility requirements of Article 22 ITC, including business purpose, a genuine transaction, proper recording and adequate evidence, remain applicable. A purely tax-return adjustment that is not reflected in the legal and accounting relationship between the parties is exposed to challenge.

The Summary Information Table and documentation file should reflect the adjusted annual amounts and explain the mechanism, calculations and timing. Where the adjustment is finalised after a filing, amended tax, documentation or reporting submissions may be required. The taxpayer should also assess VAT, withholding tax, customs valuation, Digital Transaction Duty and foreign-exchange consequences separately.

12. Are secondary adjustments applied/included in the legislation in your jurisdiction?

No. Greek transfer pricing legislation does not provide for secondary adjustments. A primary transfer pricing adjustment increases the taxpayer's taxable profits or reduces its tax loss, but it does not automatically recharacterise the adjusted amount as a deemed dividend, constructive loan, capital contribution or other secondary transaction. Consequently, there is no automatic secondary withholding tax or deemed-interest charge solely because a primary adjustment has been made.

13. What statutory provisions, regulations, or administrative guidance govern the transfer pricing treatment of transactions involving intangibles in your jurisdiction, including any specific references to OECD Transfer Pricing Guidelines Chapter VI?

Greece has no separate administrative decision devoted exclusively to transactions involving intangibles. The governing provisions are the general arm's length rule in Articles 50 and 51 ITC, where an intangible is transferred as part of a business restructuring or transfer of functions, and the documentation rules in Article 25 TPC, as amended.

Given that Article 50(2) ITC expressly imports the OECD Guidelines as interpretative guidance, Chapter VI of the OECD Transfer Pricing Guidelines is the principal framework used to identify the intangible, accurately delineate the transaction, analyse the contractual and actual conduct of the parties, evaluate DEMPE functions and risks, and determine an arm's length royalty, transfer price or allocation of returns.

14. How does your jurisdiction apply the DEMPE concept (Development, Enhancement, Maintenance, Protection, and Exploitation) when determining entitlement to intangible related returns?

There is no Greek statutory definition of DEMPE. The concept is applied through Article 50(2) ITC, which

 © 2026 Legalease Ltd

requires OECD-consistent interpretation, and therefore through Chapter VI of the OECD Guidelines.

In practice, the analysis identifies which group entities actually perform or control the development, enhancement, maintenance, protection and exploitation of the intangible; which entities provide funding; which entities make the key decisions; and which entities assume and control the economically significant risks. Written agreements, legal registrations and accounting ownership are relevant starting points but are not conclusive if they do not reflect actual conduct.

The analysis is functional and evidence-driven. Organisational charts, board and committee minutes, R&D records, budgets, approval processes, personnel interviews, IP protection activity and exploitation decisions should be consistent with the contractual allocation and the remuneration reported in Greece.

15. What legal or administrative criteria determine which entity is entitled to intangible related returns (e.g., entities controlling economically significant DEMPE related risks)?

The controlling criterion is the accurate delineation of the transaction under Article 50 ITC and the OECD Guidelines. Entitlement to intangible-related returns depends on the economically significant contributions made by each entity and, in particular, on the performance or control of DEMPE functions and the assumption and control of the associated risks.

A party claiming a risk-related return must have the decision-making capability and actual conduct required to control that risk, including the ability to decide whether and how to assume it, respond to it and mitigate it. It must also have the financial capacity to bear the consequences. Mere contractual assumption, passive ownership, cash funding or formal approval by directors who lack relevant information or authority is insufficient.

The analysis also considers the assets used, specialised personnel, unique know-how, market access, group synergies, realistic alternatives and the respective bargaining positions of the parties. Legal ownership may entitle the owner to exploit and protect the intangible, but the residual return must be allocated in accordance with actual contributions and controlled risks. Where multiple parties make unique and valuable contributions, a transactional profit split may be appropriate.

16. Does local law or administrative guidance provide specific rules for hard to value intangibles, including whether ex post outcomes may be used as presumptive evidence for testing ex ante assumptions?

Greek legislation and administrative guidance do not contain a specific hard-to-value intangibles ("HTVI") regime, and Greece has not enacted a statutory presumption equivalent to the OECD HTVI approach. In that respect, transactions involving HTVI remain subject to Article 50 ITC and Chapter VI of the OECD Guidelines.

Ex post outcomes may be examined by the tax authority as evidence relevant to whether the original assumptions were reasonable or whether material information was omitted. However, Greek law does not establish an automatic presumption that a later favourable or unfavourable outcome proves that the original price was non-arm's length. Hindsight should not replace an ex ante analysis, and the taxpayer must be allowed to explain unforeseeable developments, low-probability events and differences between forecast and actual results.

17. Does local law or administrative guidance expressly recognise cost sharing or cost contribution arrangements for the development or use of intangibles, and what requirements must such arrangements meet under applicable rules?

Greek law does not contain a specific statutory regime expressly regulating cost-sharing or cost contribution arrangements ("CCAs"). Such arrangements are not prohibited, but they are tested under the general arm's length rule in Article 50 ITC and Chapter VIII of the OECD Transfer Pricing Guidelines, which applies through Article 50(2).

A defensible CCA should identify the participants, the expected benefits for each participant, the scope and duration of the arrangement, the activities and risks covered, the method for valuing contributions, the allocation keys, the treatment of pre-existing intangibles, balancing payments, entry and withdrawal payments, changes in participants and termination. Each participant must have a reasonable expectation of benefit and must exercise control over the risks it assumes under the arrangement. A party that merely provides funding without controlling the relevant risks is not normally treated as sharing fully in the intangible return.

 © 2026 Legalease Ltd

Greek auditors may recharacterise a purported CCA as an intra-group service, licence, financing arrangement or transfer of an existing intangible if the participants lack genuine benefit expectations or risk control, or if the contractual allocation does not match conduct.

18. What transfer pricing information may be exchanged cross border, and subject to what legal conditions or limitations?

Transfer pricing information may be exchanged under several overlapping legal instruments. These include the exchange-of-information provisions in Greece's double taxation treaties; the OECD-Council of Europe Convention on Mutual Administrative Assistance in Tax Matters; EU administrative-cooperation rules implemented principally through Law 4170/2013, as repeatedly amended; country-by-country reporting under DAC4 and the relevant multilateral and bilateral competent-authority agreements; DAC6 information on reportable cross-border arrangements; and information generated through simultaneous or joint audits, Mutual Agreement Procedures, bilateral or multilateral APAs and advance cross-border rulings. Law 5301/2026 further updated the Greek DAC framework, including the automatic exchange of information on advance cross-border rulings and APAs.

Information may be exchanged automatically, spontaneously or on request, depending on the instrument. It may include contracts, transfer pricing files, comparable data, financial statements, ownership information, CbCR data, rulings, APA information, audit findings and information obtained from third parties.

The exchange must comply with the conditions of the applicable instrument, including foreseeable relevance, authorised tax purposes, confidentiality, data security and restrictions on onward disclosure. Treaty and EU rules generally prohibit fishing expeditions and protect trade, business, industrial and professional secrets, subject to the precise wording of the instrument. The requested state is not normally required to take measures contrary to its laws or administrative practice, although bank secrecy cannot generally be relied upon to refuse otherwise valid tax information requests.

19. To what extent may exchanged information be relied upon in transfer pricing assessments or litigation?

Exchanged information may be used to select a taxpayer for audit, identify risks, formulate information requests, test statements in the documentation file and support a transfer pricing adjustment. It is not automatically conclusive. The tax authority must evaluate its reliability, connect it to the accurately delineated transaction and state in the assessment the facts and reasoning on which it relies.

The taxpayer retains the ordinary procedural rights applicable under Greek and EU law, including the right to be heard, to obtain access to the material forming the basis of the assessment subject to legitimate confidentiality restrictions, to challenge accuracy and relevance, to submit contrary evidence and to seek administrative and judicial review. Information that cannot be disclosed in any meaningful form may create evidentiary and defence-rights issues if it is decisive to the assessment.

Country-by-country reports are subject to an express limitation. Under the Greek implementation of DAC4, CbCR information may be used for high-level transfer pricing and BEPS risk assessment and, where appropriate, economic and statistical analysis; Greek transfer pricing adjustments may not be based on the exchanged CbCR information itself. A detailed functional and comparability analysis is still required.

Likewise, a foreign tax authority's adjustment, ruling or audit conclusion is not binding on the Greek taxpayer or courts merely because it was exchanged. It may be persuasive evidence and may trigger MAP or corresponding-adjustment proceedings, but the Greek assessment must satisfy the applicable domestic and treaty rules.

20. What statutory or regulatory transfer pricing documentation requirements apply in your jurisdiction (including any master file, local file, or country by country reporting obligations)?

Article 25 TPC requires, where the thresholds are exceeded, a transfer pricing documentation file consisting, as applicable, of a Master File (Basic Documentation File) and a Greek Local File, accompanied by a Summary Information Table. POL.1097/2014, as amended by POL.1144/2014, prescribes the detailed content, including group and ownership information, business strategy, controlled transactions, functional and risk analysis, method selection, comparables, financial information and reconciliation to the statutory accounts. POL.1142/2015 provides further interpretative guidance.

The Master File is broadly aligned with Annex I to Chapter V of the OECD Guidelines and the Greek Local File with

 © 2026 Legalease Ltd

Annex II. For a foreign-headed group, the Master File may be maintained in an internationally accepted language, preferably English, but must be translated into Greek if requested, within the period set by the authority and no later than 30 days. Other parts of the documentation are generally maintained in Greek.

Country-by-country reporting follows the OECD Action 13/DAC4 standard for multinational enterprise groups with consolidated annual revenue of at least EUR750 million, subject to the detailed reporting-entity and local-filing rules. The CbC report is filed within 12 months after the last day of the reporting fiscal year, while the identity of the reporting entity must generally be notified by the last day of that fiscal year.

The Summary Information Table is a separate annual electronic disclosure containing aggregate transaction data and concise information on the group, functions, risks and method used. It is submitted within the deadline provided for the submission of the annual income tax return.

21. Who is required to prepare transfer pricing documentation, and what thresholds or conditions trigger the obligation?

The ordinary documentation obligation applies to associated legal persons and legal entities within Article 2(g) ITC for transactions within Article 50 ITC and transfers of functions within Article 51 ITC. It also applies to Greek permanent establishments of foreign enterprises for dealings with their head office and associated foreign enterprises, and to Greek legal persons or entities for dealings with their foreign permanent establishments.

The obligation is triggered where the aggregate annual value of all relevant controlled transactions and transfers of functions exceeds EUR 100,000 for a taxpayer with annual turnover up to EUR 5 million, or EUR 200,000 for a taxpayer with turnover above EUR 5 million. The thresholds are calculated cumulatively for the tax year. They are not applied separately by counterparty, transaction type or direction of payment.

Companies and branches subject to Mandatory Law 89/1967 are exempt from the transfer pricing documentation obligation. These exclusions do not necessarily protect a taxable associated legal entity on the other side of the transaction from its own Article 50 or documentation obligations.

CbCR applies separately to qualifying multinational enterprise groups meeting the EUR 750 million consolidated revenue threshold. The reporting duty generally falls on the ultimate parent entity, a surrogate parent or, in defined cases, a local constituent entity, together with a notification duty for Greek constituent entities.

22. What are the timing requirements for preparing and submitting transfer pricing documentation, and must documentation be contemporaneous?

The documentation file must be prepared by the deadline for filing the annual corporate income tax return. The Summary Information Table must be submitted electronically by the same deadline. It is therefore a contemporaneous annual requirement, not a file that may first be created after an audit begins.

The documentation file is retained at the taxpayer's head office for the statutory record-retention period and must be provided to IAPR within 30 days after receipt of a formal request. For a foreign group, any permitted English-language Master File must be translated into Greek upon request within the reasonable period fixed by IAPR, which may not exceed 30 days.

Article 25(5) TPC requires the file to describe market changes affecting the documented information. The taxpayer must update the file by the end of the tax year in which such a market change occurs. A prior-year file may be reused for the following year only after all necessary changes are incorporated; the formal update must be completed within four months after the end of the tax year in which the need for updating arose.

CbC reports are due within 12 months after the end of the reporting fiscal year, and CbCR notifications are generally due by the last day of that year. Any amended Summary Information Table, tax return or related filing should be made promptly when a material error or year-end adjustment is identified.

23. What penalties or sanctions apply for failure to prepare, maintain, or submit compliant transfer pricing documentation?

Articles 55 and 56 TPC provide specific penalties.

For late or inaccurate/incomplete filing of the Summary Information Table, the fine is 0.1% of the value of the transactions that were subject to documentation, with a minimum of EUR 500 and a maximum of EUR 2,000. For a late amended table, the fine applies only where the

 © 2026 Legalease Ltd

aggregate change in transaction amounts exceeds EUR 200,000. For an inaccurate table, it applies only where the inaccuracy exceeds 10% of the aggregate transactions subject to documentation.

Failure to file the Summary Information Table attracts a fine equal to 0.1% of the documented transactions, subject to a minimum of EUR 2,500 and a maximum of EUR 10,000.

Where the documentation file is supplied after IAPR's 30-day deadline, the fine is EUR 5,000 if supplied from day 31 to day 60, EUR 10,000 if supplied from day 61 to day 90, and EUR 20,000 if supplied after day 90 or not supplied at all. Repeated violations within the statutory repeat-offence framework may result in doubled and subsequently quadrupled penalties.

For CbCR, failure to file is subject to a EUR 20,000 fine, while late, inaccurate or incomplete filing is subject to a EUR 10,000 fine. These compliance penalties are separate from additional corporate income tax, interest and the penalty for an inaccurate tax return resulting from a substantive transfer pricing adjustment.

24. Are there specific transfer pricing reporting requirements in relation to the filing of the corporate tax return (e.g. specific forms on intra group transactions or special disclosures on compliance)?

Yes, but the transfer pricing disclosure is not embedded as a dedicated annex in the corporate income tax return itself. Taxpayers exceeding the Article 25 TPC thresholds must electronically file the Summary Information Table through the IAPR transfer pricing application by the deadline for the annual corporate income tax return.

The Table reports, among other matters, the associated counterparties, categories and aggregate value of controlled transactions, group information, the functions performed and risks assumed, and a brief description of the transfer pricing method used. Its figures must reconcile with the documentation file, the statutory accounting records, the corporate tax return and, where relevant, invoicing and myDATA records. Inconsistency can lead to the Table being treated as inaccurate or incomplete and may trigger an audit.

The documentation file itself is not filed routinely with the tax return; it is retained by the taxpayer and supplied within 30 days of an IAPR request. CbCR and the associated reporting-entity notification are separate electronic obligations for qualifying multinational groups and follow their own deadlines.

Where a transfer pricing adjustment affects taxable profit, the amount is reflected in the corporate income tax computation and return in the same manner as other tax adjustments.

25. Are advance pricing agreements (APAs) available under the laws or administrative guidance of your jurisdiction, and what is their legal basis?

Yes. APAs are available under Article 26 TPC, which permits the prior approval of the methodology for specified future cross-border transactions between associated persons. The regime is available to associated persons within Article 2(g) ITC, Greek permanent establishments of foreign enterprises for dealings with their head office and associated foreign enterprises, and foreign permanent establishments maintained by Greek enterprises.

The APA may cover the transfer pricing method, comparables or reference data, comparability adjustments, critical assumptions and other specialised pricing issues. It approves a methodology and the relevant criteria; it is not intended simply to approve an isolated transaction price without the supporting framework.

IAPR Decision A.1107/2023 regulates the application process, preliminary consultation, contents of the application, evaluation, interaction with foreign competent authorities, annual compliance and the circumstances in which the APA may be revised, revoked or cancelled. The taxpayer must provide full and accurate information and monitor the continuing validity of the critical assumptions.

Where the APA conditions are met, the covered prices are treated as arm's length and an audit of the covered transactions is limited principally to confirming compliance with the APA and the continuing validity of its assumptions. APAs are particularly useful for recurring, material transactions, complex intangibles, restructurings, financing arrangements and cases with a high risk of double taxation.

26. What types of APAs are permitted (unilateral, bilateral, and/or multilateral), and are there any statutory or treaty based limitations on their use?

Unilateral, bilateral and multilateral APAs are permitted. A

 © 2026 Legalease Ltd

unilateral APA is concluded between the taxpayer and IAPR. Bilateral and multilateral APAs require agreement with one or more foreign competent authorities under the Mutual Agreement Procedure of the applicable double tax treaty and are therefore available only where the relevant treaty and competent-authority relationship support the procedure.

Article 26 TPC limits APAs to specified future cross-border controlled transactions. A unilateral APA decision must generally be issued within 18 months of the application, may remain in force for up to four years and cannot apply to prior tax years.

A bilateral or multilateral application may include a rollback request for earlier years. Rollback is available only where the earlier facts are identical to the facts underlying the APA, the relevant years are still open under the limitation rules and no tax audit order has been notified for those years. If the APA requires amended returns for rollback years, they are treated as timely when filed within 30 days after notification of the APA decision.

An APA binds only for the covered taxpayer, transactions and period and only while its critical assumptions and conditions remain satisfied. It may be revised, revoked or cancelled for material changes, inaccurate information, non-compliance or changes in law. The taxpayer remains subject to documentation, record-retention and annual compliance obligations.

27. What are the safe harbour rules or simplified measures available for certain transactions or taxpayers, if any?

Greece has no general substantive transfer pricing safe harbour for particular margins, interest rates, royalties, low value-adding services or industries. The OECD simplified approach for low value-adding intra-group services has not been formally adopted, and the Amount B simplified and streamlined approach for baseline marketing and distribution activities remains under consideration (see, to that effect, January 2026 OECD country profile).

Taxpayers should therefore not rely on unofficial market mark-ups or interest-rate ranges as safe harbours. Any simplified internal policy must still be supported under Article 50 ITC and the OECD Guidelines.

28. How has the nature of transfer pricing audits evolved in your jurisdiction over the past two to three years—more targeted, or more expansive and data driven?

Transfer pricing audits have become both more targeted and more data-driven. IAPR can combine the Summary Information Table, corporate tax returns, statutory accounts, myDATA invoice data, withholding tax and VAT information, CbCR, DAC6 reports, information received from foreign authorities and prior-year audit findings. This allows risk selection to focus on discrepancies between declared transaction flows, accounting results and the economic profile reported in the transfer pricing file.

IAPR's broader digital strategy expressly emphasises profiling, mass cross-checks, risk analysis and machine-learning tools for audit prioritisation. Mandatory electronic invoicing, progressively introduced in 2026, and the continued expansion of myDATA will further improve transaction-level visibility. This does not mean that every transfer pricing audit is expansive; many remain issue-specific. However, a taxpayer can no longer assume that a formally complete local file will be reviewed in isolation from accounting, invoicing, customs, VAT and cross-border exchange data.

29. How developed is domestic case law, and does it meaningfully shape practice, or are outcomes still driven primarily by tax authorities?

Greek transfer pricing case law is developing but remains less extensive and less systematically published than in several larger OECD jurisdictions. There are decisions of the administrative courts and the Directorate for Dispute Resolution ("DRD") dealing with documentation penalties, limitation periods, the definition of associated persons, selection of methods and comparables, functional characterisation and the adequacy of audit reasoning. However, there is not yet a sufficiently dense body of Supreme Administrative Court authority to provide settled answers across all major OECD issues, particularly DEMPE, financial transactions, hard-to-value intangibles and profit splits.

Practice is therefore shaped principally by Articles 50 and 51 ITC, POL.1097/2014 and POL.1142/2015, the OECD Guidelines, IAPR audit practice and DRD outcomes. Court decisions are important where they enforce the burden of adequate reasoning, reject arbitrary method selection or address procedural defects, but their factual nature can limit broader precedential value.

 © 2026 Legalease Ltd

30. What types of transactions or structures (e.g., IP migration, platform contributions, financing, residual profit allocations) have most frequently triggered transfer pricing adjustments or disputes with the tax authority?

The most frequent disputes concern transactions for which the economic substance, benefit or comparability analysis is difficult to verify. Recurring areas include management, technical and other intra-group services, particularly where the authority challenges the benefit received, duplication, shareholder activity, allocation keys or mark-up; distribution and manufacturing arrangements involving persistent losses or returns outside the interquartile range; and financing transactions, including the quantum of debt, implicit support, credit rating, guarantees, cash pooling and interest rates.

Royalties, transfers or licences of intangibles and business restructurings attract scrutiny where legal ownership is separated from DEMPE functions, where valuable local market intangibles may exist, or where functions, risks, customer relationships or profit potential are transferred without clear compensation. Cost contribution arrangements, central procurement, contract R&D and platform or technology contributions are exposed where the parties' actual conduct does not match the contracts.

Methodological disputes are also common: selection of the tested party, use of TNMM instead of CUP, application of the Berry ratio, aggregation of different transactions, use of multi-year data, segmentation, working-capital adjustments, search criteria and rejection of loss-making comparables. Customs valuation and transfer pricing can conflict in import structures, while year-end adjustments may create VAT, withholding tax or accounting issues.

Residual profit allocations and IP migrations are less routine but high-risk because they require robust valuation, realistic-alternatives analysis and evidence of where key decisions and risks are controlled.

31. Looking five years ahead, which development is likely to reshape transfer pricing practice most profoundly in your jurisdiction—digital business models, fiscal and political pressure on tax authorities, administrative capacity, or other structural changes?

The most profound change is likely to be the convergence of digital reporting, international transparency and increasingly sophisticated risk analytics within IAPR. Mandatory electronic invoicing, myDATA, CbCR, DAC6, expanded exchanges of rulings and APAs, joint audits and Pillar Two information will give the tax authority a far more integrated view of group transactions and effective tax outcomes. Transfer pricing audits will increasingly begin with data inconsistencies and value-chain risk signals rather than a manual review of the local file alone.

Digital and highly integrated business models will intensify the substantive challenge. Greek practice will need to address data, software, remote teams, platform participation, marketing intangibles and fragmented DEMPE functions without detailed domestic rules beyond Article 50 and the OECD Guidelines. The likely result is greater reliance on accurate delineation, profit splits, valuation techniques and evidence of actual decision-making.

Administrative capacity will be decisive. More data does not automatically produce better transfer pricing analysis; specialist auditors, economists, valuation expertise and effective competent-authority resources are needed to prevent formulaic adjustments and prolonged double taxation. APAs, MAP and joint approaches should therefore become more important.

The implementation of OECD Amount B and any future EU transfer pricing harmonisation may also materially affect routine distribution cases. Nevertheless, the broader structural shift will be from periodic documentation compliance to continuous, data-consistent transfer pricing governance across tax, accounting, invoicing and operational systems.

Contributors

 © 2026 Legalease Ltd

John Papadakis
Partner
jp@dryllerakis.gr

Nikos Kalantzis
Junior Associate
n.kalantzis@dryllerakis.gr

 © 2026 Legalease Ltd