



THE GREECE GOLDEN VISA

Launched in 2013, the Greek Golden Visa Program grants a five-year residence permit in exchange for as low as a €250,000 real estate investment in Greece.

You can include your family in the residency program. The Greek Golden Visa allows you to live in Greece and travel across the Schengen region, without a visa.



Major advantages of the Greece Golden Visa Program

- Visa-free travel within Europe's Schengen Area
- No requirement to reside in Greece
- Residence permits can be acquired relevantly fast i.e within 30–60 days
- Unlimited duration (subject to renewability)/expiration of residence permit
- Low Investment Threshold in a Promising Real Estate Market
- ROI through renting out the investment property
- Residence applicable to the whole family (married spouse, children under 21 years old, and parents of the main applicant and spouse)
- Eligibility to apply for citizenship after seven years of residence
- Ability to hold shares and receive income from the dividends of a company registered in Greece (but not to be employed in Greece)

Ways of obtaining Greek Golden Visa

INVESTMENT IN REAL ESTATE:

- An investment in real estate property with a minimum value of EUR 250,000, plus the applicable taxes. However, such investment amount for property acquisition route will be increased to €500,000 from €250,000 as of 1 May 2023 in certain municipalities in Athens, Thessaloniki, Mykonos, and Santorini.





- A 10-year lease agreement for hotel accommodation or furnished tourist residences in tourist accommodation complexes (Article 8 of Law 4000/2001). A 10-year time-sharing agreement for hotel accommodation (Law 1652/1986).

CAPITAL INVESTMENT:

- A capital contribution with a minimum value of EUR 400,000 to a company that has its registered office or establishment in Greece (with the exception of portfolio investment companies and real estate investment companies) for the acquisition of shares in a share capital increase or bonds that are, at the time of issue, admitted for trading on regulated markets or multilateral trading mechanisms that operate in Greece.
- A capital contribution with a minimum value of EUR 400,000 to a real estate investment company (Article 21 of Law 2778/1999) that will invest exclusively in Greece, for the acquisition of shares in a share capital increase.
- A capital contribution with a minimum value of EUR 400,000 to a closed-end investment company (Article 5 of Law 2367/1995) for the acquisition of shares or to a closed-end mutual fund (Article 7 of Law 2992/2002).
- For the acquisition of shares, provided that the aforementioned alternative investment institutions have the intention to invest exclusively in companies that have headquarters or establishments in Greece.





SHARES, BONDS, AND/OR GOVERNMENT BONDS:

- Purchase of Greek government bonds with a minimum acquisition value of EUR 400,000 and residual maturity of at least three years at the time of purchase, via a credit institution established in Greece, which will also act as the custodian of these bonds.
- Purchase of shares or corporate bonds with a minimum acquisition value of EUR 800,000, which are admitted for trading or are traded on regulated markets or multilateral trading mechanisms, operating in Greece.
- Purchase of units with a minimum value of EUR 400,000 of a mutual fund incorporated in Greece or another country and with the intention to invest exclusively in shares, corporate bonds, and/or Greek government bonds that are admitted for trading or are traded on regulated markets or multilateral trading mechanisms, operating in Greece.
- Purchase of units or shares with a minimum purchase value of EUR 400,000 of an alternative investment fund established in Greece or another country of the EU, which intends to exclusively invest in immovable property in Greece.

FIXED TERM DEPOSIT:

- Term deposit of a minimum value of EUR 400,000 to a domestic credit institution, for at least one year, with a standing order for renewal.





Tax planning for the Greek Golden Visa benefits, together with becoming a special Greek tax resident.

On 26.02.2020 the Greek Ministry of Finance has announced the procedure which should be followed by high – net- worth individuals who wish to transfer their tax residence in Greece under the provisions of the favorable Non-Dom tax regime, which was introduced for the first time in Greece by Law 4646/2019.

The special Non-Dom tax regime provides the exhaustion of tax liability for any foreign-sourced income by paying an annual flat tax of €100.000, regardless of the amount of income earned abroad and with no obligation to declare any foreign income in Greece. The special regime provides also for an exemption from any inheritance or donation tax, as regards any property abroad. The taxes, that may have been already paid abroad, do not decrease tax liability arising in Greece under the special Non-Dom regime. The special scheme may be also extended to family members of the individual by contributing for each member annually an additional flat tax of €20.000.

Such alternative taxation starts at tax year (e.g. 2023) during which the application for the transfer of residence was submitted and expires in 15 years. The special regime will not impact the tax treatment of the Greek-sourced income. Therefore, the latter income shall be taxed according to the general tax rules applicable in Greece.

There are two substantial requirements that should be met, to become a Greek Non-Dom tax resident, which in our case do not pose any problem:

(i) the individual was not a Greek tax resident in the previous 7 out of 8 years prior to the transfer of the tax residence in Greece, and

(ii) the individual himself or through a legal entity has invested or will invest an amount of at least



500.000 € in Greece. This has to be effected beforehand in order for Michele at the same time to qualify for the Greek Golden Visa.

The required investment may take different forms, such as investments in real estate, business, (and actually through the expanded relevant Golden Visa provisions) also via eight (8) additional categories of investment in specific forms of securities, bonds or a fixed term bank deposit exceeding the value of €400,000 (in order to qualify for the Non Dom tax residence we have to top it with at least another €100,000) either as individuals or through legal entities.

One of such investments in the aforementioned, prescribed financial instruments (to be chosen/specified by you and his investment advisors upon presentation of some investment options) is the one which in our case we have decided to opt for.

In a nutshell, Non-Dom tax residents are subject to the aforementioned favorable regime, irrespective of whether or not they are physically present in Greece for more than 183 days and the center of their vital relations is in Greece, as the corpus and animus criterion is not included in the requirements prescribed by Art. 5A of Greek Income Tax Code.

However, individuals spending more than 183 days in another country could risk being considered as tax residents in such other country.

Individuals who wish to become Non-Dom tax residents should bear in mind the following dates:

application of transfer of residence is submitted until 31st March before the Tax Authority of non-Greek residents,

(iii) relevant documentation is accepted by the Authority within 60 days from the filing and until 31st May at the latest,

(iv) the Tax Authority approves the application within 60 days from the filing and notifies the foreign Tax Authority regarding the transfer of the taxpayer's residence in Greece,

(v) the flat tax of €100.000 is assessed until 30th June, and

(vi) the flat tax is paid as a lump sum until 31st July.

Exclusively for the first tax year, the individual should pay the aforementioned amount within 30 days from the approval of his/her application for the transfer of his/her tax residence to Greece. The privileged Non-Dom regime, which lasts for a maximum of 15 years, may be terminated at any time, in case the taxpayer fails to fulfill his/her obligations under this tax regime or requests the revocation of the Non-Dom Tax regime.