

TAX BRIEFING: Monthly Insight

Recent Developments in Tax Legislation

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A. Withholding Tax on Interest Paid to Swiss Legal Entities

The Independent Authority of Public Revenues (ΑΑΔΕ) by Circular E.2196/2019 clarified that

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guarantee; and

2. withhold tax on passive income (dividends, interest, rights) to legal entities established in Switzerland, the legal entities concerned may request the refund of withholding tax at the time of completion of the two-year period.

B. Withholding Tax on Interest - Related Legal Persons

In the case of bond loans between related parties the withholding tax exemption on interest:

1. is subject to all other conditions of Article 63 par. 2 of Law 4172/2013 (Income Tax Code); and
2. applies irrespective of whether the recipient of the interest is a foreign or a domestic legal person.

Contacts



Panayotis Bernitsas
Managing Partner
E pbernitsas@bernitsaslaw.com



Fotodotis Malamas
Counsel
E fmalamas@bernitsaslaw.com

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