

TAX BRIEFING: Special Edition – Vol. 3

## Recent Developments in Tax Legislation: Urgent Measures Relating to the Covid-19 Pandemic

This Briefing provides an overview of the Act of Legislative Content dated 30 March 2020 introducing new Tax provisions which arise out of the Covid-19 pandemic

### In This Issue

- A. 25% Discount on Assessed Tax Liabilities**
- B. Extension of Time Limit for Payment of Assessed Tax Liabilities on 30 and 31 March 2020**
- C. Extension of Time Limit for Payment of Assessed Tax Liabilities in April 2020**
- D. Measures on the Extension or Suspension of Deadlines of the Tax Procedure Code**

The Act of Legislative Content dated 30 March 2020 introduces the following tax measures due to the occurrence of the COVID-19 pandemic.

#### **A. 25 % Discount on Assessed Tax Liabilities**

1. Legal Entities whose operations have been suspended by law or their main or secondary activity is included in the list of the Code Activity Numbers issued and updated by the Ministry of Finance as a result of Covid-19<sup>1</sup> are entitled to a 25% discount on:
  - a. established tax debts; and
  - b. settled tax debts on the basis of payment plans

due from 30 March 2020 until 30 April 2020, on condition that the respective taxes are paid on time.

2. VAT and withholding taxes due from 30 March until 30 April 2020 that are not subject to a settlement or payment plan scheme will not benefit from the 25% discount.

#### **B. Extension of Time Limit for Payment of Assessed Tax Liabilities on 30 and 31 March 2020**

1. Ministerial Decision A.1068/2020 provides that the time limit for the payment of tax debts due on 30 and 31 March 2020 has been extended to 10 April 2020 on condition that the respective taxes are paid on time.

#### **C. Extension of Time Limit for Payment of Tax Liabilities due in April 2020**

1. Ministerial Decisions A.1072/2020 and A.1073/2020 provide that the time limit for the payment of tax liabilities and VAT due from 1 April 2020 to 30 April 2020 to the tax authorities is extended until 31 August 2020. Legal entities

<sup>1</sup> i.e. legal entities the operation of which has been suspended by law or their main or secondary activity is included in the list of the Code Activity Numbers issued and updated by the Ministry of Finance

# BERNITSAS briefing

affected by the spread of the Covid-19 virus benefit from this time extension. The extension applies to those entities that on 20 March 2020 had one of the activity code numbers included in the list attached to these Decisions as their main or secondary activity code number (ΚΑΔ). Payments of settled debts that are paid in instalments or partially by legal entities affected by the spread of Covid-19 are extended until 31 August 2020.

2. The collection of debts and overdue VAT on 1 April 2020 from legal entities included in the Ministry of Finance's list is suspended until 31 August 2020.
3. No interest or penalty is due upon payment of the debt due.
4. The above benefits are revoked if legal entities proceed to dismissals of employees under an employment contract during the suspension period.
5. Ministerial Decisions A.1074/2020 and A.1075/2020, provide for the same time extension to natural persons who are lessors of real estate leased to legal entities affected by Covid-19, as well as to their employees.

## D. Measures on the Extension or Suspension of Deadlines of the Tax Procedure Code

Article 6 of the Act of Legislative Content dated 30 March 2020 stipulates that:

1. The time limit for the tax authorities to serve notice of temporary or final tax assessment acts is suspended until 30 April 2020.
2. The imposition of precautionary measures is suspended for a time period equal to the time period that the operation of the courts is suspended.
3. The time limit for a taxpayer to respond to the temporary tax assessment act is suspended until 31 May 2020. The deadline by which taxpayers should respond to requests by the tax authorities regarding submission of books, records and other compliance documents is also suspended until 31 May 2020.
4. The time limit for filing of quasi-judicial recourses and requests for suspension of execution of assessment acts which expire between 11 March 2020 and 31 May 2020, is suspended for 60 days. Moreover, the time limit for the issuance of decisions by the Dispute Resolution Directorate which have not been completed between 20 March 2020 and 31 May 2020, and for cases for which no decision was issued up to 20 March 2020, is also extended by 60 days.
5. The time limit for the issuance of tax or fine assessment acts expiring on 31 May 2020 is extended until 31 July 2020.

## Contacts



**Panayotis Bernitsas**  
Managing Partner  
E pbernitsas@bernitsaslaw.com



**Fotodotis Malamas**  
Counsel  
E fmalamas@bernitsaslaw.com

This Briefing is intended to provide general information and is not meant to constitute a comprehensive analysis of the matters set out herein or to be relied upon as legal advice. It is not meant to create a lawyer-client relationship. Legal and other professional advice should be sought before applying any of the information in this Briefing to a specific situation.

Bernitsas Law Firm is a partnership of attorneys regulated by Presidential Decree 81/2005 and Law 4194/2013, as currently in force, with its registered address at 5 Lykavittou Street, Athens 106 72, Greece.

If you no longer wish to receive Briefings from us, please click here to [Unsubscribe](#)