



08.05.2020

# Covid-19 Alert

Our-multidisciplinary coverage on key areas affecting your business

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## 1. General

### 1. Air Borders 03.05.2020

- Temporary entrance ban (for all borders) of non-EU Citizens until 15.05.2020 excluding EU and Schengen Treaty citizens and members of their family, employees having a working permit in another EU country for purposes related to their work, truck drivers transporting cargo through Greece, government officials, transit passengers, consulate and diplomatic missionaries, medical staff and humanitarian organisations.
- By virtue of the leg act of 13.4.2020, new measures have been adopted on air ticket refunds by Air Carriers to air passengers for cancelled flights, which were or will be cancelled from 25 February until 30 September 2020; Refund claims of air passengers, due to cancelling of flights, will be settled by the provision to the beneficiaries of a credit voucher of equal value to the ticket. The credit note is issued by the air carrier and its expiration date is 18 months from its issuance. During the 18-month period, the recipient of the voucher can make use of it to any destination that the network of the Air carrier offers. If the voucher has not been used by then, then the air carrier will have to proceed to the refund.
- Suspension of flights to and from Albania, North Macedonia, Italy, Spain, Turkey, the UK, the Netherlands and Germany is extended until the 15th of May 2020. Suspension does not include cargo, sanitary, humanitarian, ferry flights, state, emergency, military (Turkey not included) and Frontex flights. Flights to and from Germany are permitted only to and from Eleftherios Venizelos Athens International Airport.
- Suspension of internal connection flights from the mainland to Greek islands and between Greek islands until the 18th of May 2020. From such suspension are excluded specific categories, such as permanent residents of the islands, medical staff, technical staff, public officers and military staff. Where flights are executed, compliance with hygiene measures is required, i.e. 1 person per 15 sq. m and at least 2m distance between persons. Crew and passenger cabins can only host 1 passenger and 1 member of the crew respectively.

### 2. Land Borders 14.04.2020

- Closed borders with Turkey, North Macedonia and Albania, excluding cargo and Greek citizens having their permanent residence in Greece until the 15th of May 2020.
- Temporary entrance ban (for all borders) of non-EU Citizens until 15.05.2020 excluding EU and Schengen treaty citizens and members of their family, employees having a working permit in another EU country for purposes related to their work, truck drivers transporting cargo through Greece, government officials, transit passengers, consulate and diplomatic missionaries, medical staff and humanitarian organisations.

### 3. Maritime Borders 03.05.2020

- Ferry routes to and from Italy and Albania are suspended with the exception of cargo and Greek citizens having their permanent residence in Greece until the 15th of May 2020.
- Departure and arrival of all private and professional tourist cruise ships and day ships, regardless of their flag in the Greek ports is suspended until the 18th of May 2020 with certain exceptions, such as for mechanical damages, force majeure, refueling of ships, repairs.

- Temporary entrance ban (for all borders) of non-EU Citizens until 15.05.2020 excluding EU and Schengen treaty citizens and members of their family, employees having a working permit in another EU country for purposes related to their work, truck drivers transporting cargo through Greece, government officials, transit passengers, consulate and diplomatic missionaries, medical staff and humanitarian organisations.
- Transportation of people from the mainland to the islands and vice-versa within the Greek territory has been suspended until the 18th of May 2020. This suspension does not include permanent residents of the islands, military, navy and coastguard staff, public servants working in the islands, medical and nursing staff and anyone providing medical and security services and any other transportation which is being done for reasons of exceptional social need.
- By virtue of the leg act of 13.4.2020, new measures have been adopted on ferry ticket refunds by sea carriers to passengers for cancelled sea travels, which were or will be cancelled from 25 February until 31 October 2020; Refund claims of passengers, due to cancelling of sea travels, will be settled by the provision to the beneficiaries of a credit voucher of equal value to the ticket. The credit note is issued by the sea carrier and its expiration date is 18 months from the date of the cancelled trip. During the 18-month period, the recipient of the voucher can make use of it to any destination that the network of the sea carrier offers. If the voucher has not been used by then, then the sea carrier will have to proceed to the refund.

#### 4. Temporary Movement Restrictions 03.05.2020

Partial lifting of the strict movement restrictions as from the 4th of May 2020. Nevertheless, restriction still applies until the 18th of May 2020 for movement outside of the Prefecture, excluding movement to work with the respective employer's declaration (Type A), movement for health issues, movement to a ceremony (such as funerals), movement of divorced parents for communication with their children and movement to permanent residence. The SMS feature for movement has been lifted.

#### 5. Operating Businesses

- **04.05.20:** Small retail commercial stores and services to be re-opened as from the 4th of May 2020. Retail stores include bookstores, optical stores, athletic equipment, plants/fertilisers, stores of electronic equipment and services include hairdressers and barbershops, beauty salons, Roadworthiness Test Centres ("KTEO"), personal fitness equipment stores and restoration of clothes and shoes services. Operation of organised beaches, ski centres and lifts are suspended until the 10th of May 2020. Exceptionally, some sports facilities are to be re-opened as from the 5th of May 2020, under specific conditions.
- **18.05.2020:** The Government announced that all other retail stores (excluding Malls) and services to be re-opened on the 18<sup>th</sup> of May 2020. Services include driving schools, gambling stores (OPAP) without tables.
- **01.06.2020:** The Government announced that malls, Food Service Stores, restaurants, bars and hotels (12 month' duration) to be re-opened as from the 1st of June 2020.
- All businesses already operating will continue to do so normally.

## 6. Safety Measures 04.05.2020

- **Use of masks:**
  1. Obligatory use of masks by employees in services that require physical contact (for example hairdressers, barber shops, beauty salons, super market and food stores).
  2. Strong suggestion for the use of masks in all closed space places by employees and customers.
- **Distance Measures:** General distance maintenance of 1.5m. Stores up to 20 sq. m. will be able to host up to 4 persons. Stores from 20 to 100 sq. m. will be able to host 4 persons plus 1 person per 10 sq. m. Stores above 100 sq. m will be able to host 12 persons plus 1 person per 15 sq. m. Stores above 300 sq. m will be able to host 1 person per 10 sq. m per floor.
- **Office spaces and administrative departments of private businesses:** minimum distance between employees of 1.5 m and maximum 1 person per 10 sq. m
- **Use of elevators:** The use of elevators is strongly suggested to be avoided. If their use is required, it should be on the 40% of their maximum capacity. If there are escalators, the use of the elevator is permitted only for handicapped people, elderly people and for catering supply.
- **Operating hours:** Commercial stores that will re-open to be opened at 10:00 am in Attica and Thessaloniki. Hair salons and beauty salons can operate from 7:00 am until 10:00 pm and on Saturday from 7:00 am until 9:00 pm.

A List of TAX Activity Codes related to the activity of businesses specifying the complete list of stores that will re-open gradually on the above listed dates as well as of those that will remain closed will be released. Administrative fines of EUR 1,000 to EUR 100,000 may be imposed to businesses dependent on the size of the commercial store and the type of breach.

## 7. Holding of Shareholders' and Board of Directors meetings meetings 20.03.2020

By virtue of the leg act of 20.03.2020, all general meetings of shareholders or partners of all legal entities will be able to be hold via teleconference for all or some of its participants. In this case, specific teleconference details will have to be provided in the invitation to the respective general meeting. By virtue of the leg act of 30.03.2020, the above measure has been extended for Board of Directors' meetings. The signatures of the members of each instrument may be replaced by e-mail exchange or other electronic means (including e-signatures), regardless of a respective provision in the Articles of Association.

Such provision is applicable until 30 June 2020.

## 8. Ultimate Beneficiary Owners (UBO) Registry 30.03.2020

The operation of the UBO Registry is suspended for a period of 3 months, i.e. until 30.06.20. During the suspension of the operation of the Registry, the deadlines for submission of the UBO details are suspended as well.

## 2. Commercial Transactions

- 1. Commercial contracts and other arrangements**  
20.03.2020

Covid-19 and the measures taken by the Greek government may affect the performance of a contract that is governed by Greek law, so that performance is either delayed or becomes more onerous.

It is strongly suggested that counterparties are informed immediately of any performance issues.
- 2. Force majeure as ground to terminate the agreement and excuse the non-performing party from any liability**  
20.03.2020

Force majeure and termination clauses may be triggered as a result of the disruption caused by Covid-19 in trading activities; the non-performing party may seek to be released from its obligations to perform and be exonerated from any liability.

The issue as to whether a party may invoke force majeure as a result of Covid-19 preventive measures needs to be reviewed on a case by case basis following careful assessments of the facts at hand; the timing of the contract execution and the circumstances are also relevant.
- 3. Supply chain, sale and purchase and distribution agreements**  
20.03.2020

As a result of the measures implemented, delivery may be delayed and performance may be impeded temporarily; the non-performing party would normally be able to such temporary breach in order to be released from its obligations and be exonerated from any liability provided that it is in the position to show that it is not at fault and that its non-performance is attributable to Covid-19 outbreak and the measures taken by the government.
- 4. Impossibility of performance**  
20.03.2020

Impossibility may arise as a result of an extraordinary, unavoidable and unforeseeable event which could not be prevented by the parties and which renders the performance of the contract impossible. Careful assessment of the facts is necessary in order to safely conclude whether Covid-19 circumstances indeed made the performance of the contract objectively impossible.

In cases where the impossibility is only temporary or it is subjective, the parties may not be released from their obligations.
- 5. Economic hardship**  
20.03.2020

Covid-19 measures may arguably make the performance of the contract significantly onerous for either or both parties; in such case the parties may renegotiate the contract terms in the light of the new circumstances and reach an equitable solution.

If no agreement is reached by the parties, a legal action may be filed with the court whereby the claimant may request the equitable modification of the agreement terms arguing that the circumstances have changed substantially and lead to a serious disproportion between the parties' obligations.

## 3. Finance

### 1. Borrower support measures 23.03.2020

**For Businesses:** On 17.03.2020 the Hellenic Bank Association decided the suspension (until at least 30.9.2020) of the repayment of loan principal for business loans, provided that such loans were performing on 31.12.2019 (the suspension will be provided upon the borrower's request). Interest continues to be payable during such period. Furthermore, on 18.03.2020 the Greek Government announced the granting of a three month (i.e. April, May and June 2020) interest rate subsidy to businesses of the sectors of the economy that are directly affected by Covid-19. The subsidy will be granted under the National Strategic Reference Framework 2014-2020 (in Greek ESPA 2014-2020) financed by the Hellenic Republic and the European Union. Ministerial decision no. 37674/2020 issued on 10.04.2020 specifies the details and eligibility criteria in respect of the three-month rate subsidy to SMEs (as defined in the Annex I of EU regulation 651/2014) affected by Covid-19. The subsidy will be granted only for business loans performing on 31.12.2019 and in any case arising from loan agreements signed before 01.04.2020. Applying SMEs shall not be "undertakings in difficulty" in the meaning of Annex IV of the ministerial decision unless they qualify as such due to the outbreak of Covid-19 and on 31.12.2020 shall have at least the same number of employees as on 19.03.2020. Applications may be submitted from 15.04.2020 to 30.06.2020, through the address [www.ependyseis.gr/mis](http://www.ependyseis.gr/mis) of the Ministry of Development and Investments. The subsidy is capped to €800,000 per undertaking.

On 13.04.2020 the Greek Government announced the granting of financial aid, especially for tourism businesses. The relevant leg act specifying the requirements and further details of this financial aid is expected to be issued soon.

**For Individuals:** On 19.03.2020 the Hellenic Bank Association decided the suspension of loan repayment for borrowers-individuals who are evidently affected by Covid-19 and are eligible for the EUR 800 supplement. Such suspension will last three months and will be communicated by the banks to each borrower.

**For businesses & individuals:** On 01.05.2020, the Greek Government announced, by means of a new leg act with a retroactive effect from 30.04.2020, that the deadline set previously by Greek law 4605/2019, in respect of the submission of applications by individuals for the settlement of their debts and the protection of their primary residence from enforcement measures, is extended to 31.07.2020. Previously, on 31.03.2020, the Greek Government had announced, by means of another leg act, that certain procedural deadlines applying to the framework of law 4469/2017 ('out of court workout') and law 4605/2019 ('primary residence protection scheme') (e.g. deadlines for the notification of the creditors regarding the submission of the application, deadlines for negotiations held with the creditors, deadlines for the suspension of auctions against the primary residence etc.) are suspended for a 3 months period after 31.03.2020, provided however that the relevant application for the submission of the relevant business or individual in said frameworks had previously been submitted duly and timely. In addition, for those of the businesses or individuals, as the case may be, who have suspended their operations or have been severely affected due to the outbreak of Covid-19, a 3 month suspension has been provided after 31.03.2020 for any due and payable instalments they would have to meet under a settlement plan of any of the 'out of court workout' framework, the 'primary residence protection' scheme or law 3869/2010 (i.e. the previous primary residence protection scheme and debt settlement framework). For any business or individual that is not currently included as an affected one in the issued leg acts and ministerial decisions, the 3-month suspension to their instalment plan may be granted by the relevant creditors involved

in the process following an ad hoc application on behalf of said obligor.

Measures announced by the Hellenic Bank Association and the Greek Government.

## 2. Servicing and Debt collection companies 23.03.2020

On 19.03.2020 the Hellenic Loan Servicers Association announced three-month suspension of any loan instalment payable by all individuals eligible for the EUR 800 special supplement. In addition, suitable solutions offering the option to reduce the instalment amount or suspend the payment of instalments for three months will be offered to each borrower (whether individual or business) affected by Covid-19. Servicers are expected to suspend communication with borrowers claiming a substantiated cause affecting their ability to meet their payments (and providing relevant evidence to this end). Servicers have also provided instructions to their external partners (such as debt collection companies or lawyers) to act in accordance with the above approach.

## 3. Business financing 23.03.2020

- The Greek government announced the following initiatives for the financing of businesses:
  - Granting of new loans of EUR 2 billion to businesses through the European Investment Bank.
  - Establishment of a new guarantee mechanism for working capital loans to small and medium sized enterprises of up to EUR 3 billion and for investment loans of up to EUR 500 million.
  - Increased funding for the Hellenic Development Bank's Entrepreneurial Fund by EUR 250 million for the granting of new loans to businesses affected by Covid-19 along with a 100% interest rate subsidy for two months.

No relevant leg act specifying the above has been issued until the date of this report. Yet, on 28/04/2020 Hellenic Development Bank SA has announced the launching of a new program for working capital loans with 100% interest rate subsidy for the first two years. Such loans will be funded by the National Fund for Entrepreneurship and Development (ETEAN SA) under "Business Financing - TEPIX II". Companies affected by the outbreak of Covid-19 may apply for such loans through several Greek banks. The loans shall be up to 50% of the turnover of the previous fiscal year, for a period of 24-60 months, a potential grace period of 6-12 months and an interest rate no higher than 8% for the first two years. Applying companies shall preserve for the first two years the number of their employees as on 19/03/2020.

- Financing in the form of refundable advance payments of a total amount of EUR 1 billion with low interest rate and 5-year maturity. A ministerial decision issued on 16.04.2020 has amended the ministerial decision dated 03.04.2020, which specified the details and eligibility criteria in respect of the refundable advance payment and expanded the eligible undertakings. In particular, from 03.04.2020 to 21.04.2020, either businesses (with 1 up to 500 employees) or businesses without employees which operate under specific business forms (i.e. partnerships, private companies (IKE) and limited liability companies) may apply through TAXISNET platform to receive this form of financing from the Greek government. Only businesses with registered seat or permanent establishment in Greece, which have been affected from the incidence and spread of Covid-19, shall proceed with the

mentioned application. Further to this, all applicant businesses shall be going concern undertakings from April 2019 onwards. Businesses may proceed with the application in case they are not “undertakings in difficulty” in the meaning of EU Regulation 651/2014 on 31.12.2019, provided that they have not previously been granted financial aid acknowledged as incompatible by European Commission, or in case they fulfil the conditions of EU Regulation 1407/2013 and provided they have not exhausted the state aid cap provided by said regulation for the 3-year period 2018-2020 (in which case they must not be businesses active in the fisheries, aquaculture and agricultural production sectors). The method of calculation of the exact amount of the financing and the grant procedure have been further specified by a Ministerial Decision issued on 03.05.2020, setting out also additional criteria on which the repayable advance is based upon. In particular, all businesses having completed the aforementioned application shall proceed with a new application through TAXISNET platform until 15.05.2020. This application shall include: i) the exact amount of the expected financing; ii) whether the financial aid is requested on the basis of the Temporary Framework C/2020.1863 (as announced by the EU Commission for the support measures against Covid-19) or on the basis of Regulation (EU) No. 1407/2013 (i.e. the state aid *de minimis* regulation); iii) data and information supporting the conditions for the application. The ministerial decision sets out a sample application format in its annexes, which businesses shall consult prior to submitting their second application. Further to such second application, the applicant business shall be notified electronically via the Taxisnet platform on whether their application has been successful and thus they are eligible for the advance grant. In case the application is unsuccessful, the applicant business may request reexamination of the relevant application within 5 business days from the date of the electronic notification. The advance grant will bear interest calculated on the basis of the 1 year IBOR reference rate applicable in Greece plus 109 bps. A grace period will run from the date of the advancement up to 31.12.2021, where the relevant businesses will not be required to repay any amount of principal or interest. After the lapse of the grace period the amount of the advance grant shall be repaid in 40 equal interest-bearing monthly instalments, each one being due and payable on the last business day of each calendar month. However, if, following the granting of the advance, the annual turnover of a business remains lower by 70% or above compared to the annual turnover or annual gross income of the same business that were taken into account for the eligibility of the business in this scheme, the relevant business shall have the right to only repay to the State an amount equal to 70% of the advance grant. In addition, those of the businesses that on 31.03.2020 used to employ more than 20 employees (and provided that they will maintain the same number of employees up to 31.03.2020) shall have the right to only repay to the State an amount equal to 60% of the advance grant. In any case, all subsidised businesses shall maintain the number of employees employed by them on 31.03.2020 up until 31.10.2020, otherwise a mandatory prepayment event of the advance grant would be immediately triggered for the immediate repayment of the full amount of the grant’s principal and also its interest from the immediate repayment of the full amount of the grant’s principal and also its interest from the day of its disbursement up to the date of such mandatory prepayment.

#### 4. Ban on short selling 23.04.2020

The Hellenic Capital Market Commission decided on 17.03.2020 to temporarily prohibit short sales and other transactions that create or increase the net short position in shares listed on the ATHEX, irrespective of the venue where the transactions are executed. The prohibition was initially effective from 18.03.2020 until 24.04.2020 and has been further extended until 18.05.2020.

The prohibition does not apply to: a) market makers performing market making activities that are conducted for hedging purposes, b) the creation or increase of net short positions through index derivatives providing that the index composite does not include shares listed on the ATHEX in a percentage over 50% of the index weight.

#### 5. Alternative methods for verification of the customers' identity during the Covid-19 crisis 23.04.2020 24.04.2020

The HCMC issued on 24.04.2020 an announcement on the due diligence measures to be applied by obliged entities which are supervised by the HCMC on their clients during the Covid-19 crisis. Obligated entities are entitled to apply alternative methods (e.g. video calls, teleconferences, geolocation etc.) for the verification of the customers' identification which do not necessitate the customers' presence in the obliged entities' offices. Obligated entities do not have to officially amend their existing anti-money laundering policies and procedures in order to be able to apply the alternative methods for verification of the customer's identity without being necessary. They just need to keep a record with the changes applied in their policies and procedures during the Covid-19 crisis.

#### 6. Actions to mitigate the impact of Covid-19 on the financial markets 23.04.2020

- Following the recent legislative act, the deadline for the publication of annual financial reports by companies listed on the Athens Exchange is extended until 30 June 2020 in line with the guidance issued by the European Securities and Markets Authority (ESMA) on 27 March 2020.

Previously, ESMA in coordination with the European Banking Authority issued also guidelines in relation to the accounting implications of the Covid-19 outbreak on the calculation of expected credit losses in accordance with IFRS 9, noting that the measures taken in the context of the Covid-19 which permit, require or encourage suspension or delays in payments, should not be regarded as automatically having impact on the assessment of whether loans have suffered a significant increase in credit risk.

Companies listed on the Athens Exchange must in any case assess the actual and potential impact of COVID-19 on their fundamentals, prospects and financial situation and proceed to the necessary disclosures provided by the Market Abuse Regulation.

- In addition ESMA acknowledging difficulties encountered by fund managers (UCITS management companies, AIFMs, EuVECA managers and EuSEF managers) due to COVID-19 to prepare and publish their periodic reports (yearly and half-yearly reports) within the regulatory deadlines (i.e. regarding Greek UCITS management and investment companies for 31 December 2019 financial year-ends, the latest publication date is 30 April 2020, Greek AIFMs for 31 December 2019 financial year-ends, the latest publication date is 30 June 2020), announced on 9th April 2020 that national competent authorities, including the Hellenic Capital Market Commission, shall not prioritise supervisory actions against these market participants in respect of the upcoming deadlines in relation to:

- annual reports referring to a year-end occurring on or after 31 December 2019 but before 1 April 2020 for a period of two months following the relevant deadline;

- annual reports referring to a year-end occurring on or after 1 April 2020 but before 1 May for a period of one month following the relevant deadline; and
- half-yearly reports of UCITS referring to a reporting period ending on or after 31 January 2020 but before 1 April 2020 for a period of one month following the relevant deadline

## 7. Issues related to payment of cheques 31.03.2020

- On 31.03.2020, the Greek Government announced, by means of a new legislative act, the suspension of the time-limits for the submission, expiry and payment of cheques and other negotiable instruments issued by businesses which have suspended their operations or have been severely affected due to the spread of Covid-19, by setting a suspension of 75 days from the relevant date referred to on the body of the said negotiable instrument (thus clearly resolving also the issue of the '*post-dated cheques*'). This measure shall be in force from 30.03.2020 until 31.05.2020 and apply to negotiable instruments that will be electronically submitted, by the respective obligors and beneficiaries (issuers, holders, receivers) to the credit and financial institutions lawfully operating in Greece (via a special operation of the 'Teiresias' system) within 3 business days from 31.03.2020. Businesses that have not yet been included in the list of the businesses affected from the outbreak of Covid-19 by means of a ministerial decision may also benefit from this measure, provided their negotiable instruments are submitted to the credit and financial institutions via the 'Teiresias' system within 3 business days from the issuance of the ministerial decision, pursuant to which such businesses will be characterised as affected from the Covid-19 outbreak. A ministerial decision from the Minister of Finance is expected to clarify the specific process and technical details of submitting the electronic notifications with regard to the negotiable instruments through the 'Teiresias' system.
- Suspension of tax and social security obligations as of 1 April 2020 and onwards for businesses which present for payment negotiable instruments, the payment of which has been suspended in accordance with the above, provided that the aggregate value of those 'suspended' instruments is higher than 20% of their average monthly turnover of the immediately preceding tax year (based on the relevant VAT tax returns for the said period). This measure is only applicable for businesses that have not been listed already as affected businesses due to the outbreak of Covid-19 by means of a legislative act. All business which present a significant increase of their turnover during the covid-19 crisis (e.g. retail supermarkets) are expected to be set out in a ministerial decision of the Minister of Finance and are to be excluded altogether from the perimeter of these measures regarding the negotiable instruments' suspensions.

## 8. Other 30.03.2020

On 26.03.2020 the Hellenic Bank Association announced the increase of contactless payment limit from €25 to €50. This measure has come into force on Monday, 30.03.2020, and shall apply until Sunday, 31.05.2020.

## 4. State Aid

### 1. State Aid Temporary Framework 07.05.2020

In view of the Covid-19 outbreak, the European Commission mobilises two tools (two separate exemptions of aid compatible with the common market) in order to address the crisis and support the economy of Member States. Firstly, article 107 (2) (b) TFEU regarding state aid to compensate damages caused by exceptional occurrences; secondly, article 107 (3) (b) TFEU regarding state aid to remedy a serious disturbance in the economy of a Member State. In the context of the second exemption, a new State aid Temporary Framework was adopted by the European Commission on 19.03.2020. Specific guidance is provided in the Temporary Framework, as amended on 03.04.2020, on the compatibility conditions applying on the following types of measures made available to them: (i) direct grants, repayable advances or tax advantages; (ii) guarantees on loans; (iii) subsidised interest rates; (iv) short-term export credit insurance; (v) aid for Covid-19 related R&D; (vi) aid for the construction and upscaling of testing facilities; (vii) aid for the production of Covid-19 relevant products; (viii) aid in the form of (selective) tax deferrals and/or suspensions of social security contributions; and (ix) aid in the form of (selective) wage subsidies for employees. The Commission has published templates for the notification of the respective measures.

Aid may not be granted to undertakings that were already in difficulty (within the meaning of Rescue and Restructuring Guidelines) on 31.12.19. Furthermore, aid granted by Member States under the Temporary Framework to undertakings, and channelled through banks as financial intermediaries, shall benefit the undertakings directly and does not have the objective to preserve or restore the viability, liquidity or solvency of banks. Nevertheless, if, due to the COVID-19 outbreak, banks were to require direct support in the form of liquidity or recapitalisation or impaired asset measures, it will have to be assessed whether the measures meet the conditions provided for by the BRRD.

Non-selective state measures applying to all companies in a Member State and measures directly benefitting consumers do not qualify as state aid and as such are not covered by the Temporary Framework.

Moreover, on 09.04.20, the Commission sent to Member States for consultation a draft proposal to further extend the scope of the Temporary Framework, in order to enable Member States to provide recapitalisations to companies in need, as an ultimate – though – measure of support.

The European Commission maintains an overall list -last update on 07.05.2020- of Member State Measures approved under Articles 107(2)b and 107(3)b TFEU, as well as under the Temporary State Aid Framework. Regarding Greece, the European Commission has until now approved four (4) state aid schemes notified by the Greek Government under the Covid-19 Temporary Framework (briefly discussed below).

### 2. Loan guarantees to financial intermediaries for working capital loans 05.05.2020

The first Greek state aid scheme, approved by the European Commission on 03.04.2020 initially amounted to €2 billion. On 30.04.2020 its scope was extended and its budget increased to €2.25 billion in order to cover subsidisation of guarantees. The scheme constitutes support in the form of guarantees on loans in order to help businesses cover immediate working capital needs and -following its amendment- offers also the possibility for subsidisation of the guarantee premiums for loans. The amended scheme will be co-financed by EU structural funds (ESIF). The measure will be implemented through the issuance of guarantees by the Hellenic Development

Bank (“HDB”) to financial intermediaries and will partially guarantee eligible working capital loans originated by financial intermediaries. The subsidisation will take the form of direct grants from the newly established “COVID-19 Guarantee Fund” of the HDB. This scheme is open to all Greek undertakings, including from 30.04.2020 the self-employed and the undertakings active in the aquaculture and agriculture sector also, with the exception of financial intermediaries, such as banks and sectors non-eligible by the European Regional Development Fund.

### 3. Repayable advances scheme

08.04.2020

On 07.04.2020, the European Commission approved a repayable advances scheme amounting to an estimated €1 billion to support companies affected by the Covid-19 outbreak. The scheme, which is open to companies active in all sectors and applies to the whole territory of Greece, is targeted at companies having temporary financial difficulties due to the Covid-19 outbreak. Eligible for support under this scheme are undertakings that have suffered a significant reduction of their business activity, namely of at least 30% compared to the average business activity of the corresponding period in the preceding 3 years or the corresponding period if a company exists less than 3 years. An additional eligibility requirement is for the beneficiaries to have 1 - 500 employees. The support is to be disbursed by the Greek Independent Authority for Public Revenue (AADE) directly to the companies, without the intermediation of banks and will be granted until 30.06.2020.

### 4. Grants for SMEs

08.04.2020

On 08.04.2020, the European Commission approved a €1.2 billion scheme in the form of grants to SMEs affected by the Covid-19 outbreak. The support is intended to cover interest up to €800K per company on existing debt obligations (fixed-maturity loans, bonds or bank overdrafts) for a period of 3 months, with an option for extension for another 2 months. The scheme will apply to the whole territory of Greece and will be open to SMEs from sectors affected by the Covid-19 outbreak in order to support their liquidity.

### 5. Grants for companies in the floriculture sector

05.05.2020

Finally, on 05.05.2020 the European Commission approved a €10 million State aid scheme to support the floriculture primary production sector in the context of the coronavirus outbreak. The support will take the form of direct grants, implemented by the national Payment and Control Agency for Guidance and Guarantee Community Aid (“OPEKEPE”). It will be accessible to companies of all sizes active in this sector in Greece, in order to ensure that those companies have sufficient liquidity to maintain their activities during and after the outbreak. Undertakings active in the processing and marketing of agricultural products as defined in Article 2(6) and 2(7) of the Agricultural Block Exemption Regulation (“ABER”), are excluded from the scope of the measure. Also, aid may not be granted to undertakings that were already in difficulty, within the meaning of the General Block Exemption Regulation (“GBER”) or the ABER, on 31.12.2019. Aid under this scheme can be granted until 31 December 2020.

## 5. Healthcare - Public Procurement

- 1. Emergency measures to ensure the adequacy of personal protective equipment and personal hygiene**  
14.03.2020
- Companies active in the chain of production, import, marketing, sale, brokerage, movement and distribution of medicinal products and personal protective equipment and personal hygiene in the Greek territory shall submit to the competent authority every 2 days, data as to their stock in: (a) surgical masks; (b) antiseptic solutions; and (c) antiseptic wipes.
- 
- 2. Requisition of goods, consumable and non-consumable**  
14.03.2020
- Goods, consumable and non-consumable belonging to individuals or legal entities and falling within the meaning of special hospital equipment, personal protective equipment and medicines may be requisitioned for a period of 6 months.
- The scope of special hospital equipment includes: respirators, hospital beds, standard bed equipment, vital signs monitors, closed suction systems and necessary medical devices adjacent to the ventilator function.
  - Personal protective equipment is defined as: masks of all kinds, personal protective equipment and sanitary clothing.
- The exact procedure regarding the determination as well as payment of the compensation for the requisition is set out in detail in Article 6 of the leg act dated 14.03.2020.
- 
- 3. Preventive measures for the safety of the population taken by the National Organisation for the Provision of Healthcare Services (EOPYY)**  
18.03.2020
- Healthcare Professionals (HCPs) are given the opportunity to issue repeated medical prescriptions until 30/06/2020 for vulnerable groups of the population.
  - Patients receiving High Cost Drugs (CVD) from EOPYY pharmacies and belonging to vulnerable groups can appoint a person to receive their medicines with a simple solemn declaration (without validation of the signature).
  - Scheduled delivery of High Cost Drugs (by appointment) enters into force at the EOPYY central pharmacy in Maroussi and thereafter, the service will be available at all EOPYY's pharmacies.
  - The possibility of online submission for the execution of electronic advice on special treatment provided by certified (non-contracted) therapists through the EOPYY's online applications at no cost for the insured is set forth.
  - The date of submission, for February, of all health service providers contracted with EOPYY, is extended until 31.03.2020.
- 
- 4. Maximum quantity of goods sold for personal hygiene and protection**  
20.03.2020
- A maximum amount of 3 units may be imposed by suppliers on the retail sale regarding products of personal protection and hygiene, e.g. antiseptics, masks, disinfectants for the next 6 months provided there is still a risk of Covid-19 spreading.
- 
- 5. Sampling cosmetics**  
20.03.2020
- No sampling of cosmetics may be made available to consumers and any such sampling products must be removed from all retail outlets.
- 
- 6. Maximum profit margin**  
20.03.2020
- A maximum profit margin is set at that which was effective on 1 February 2020 for products which are necessary for the health, nutrition, transportation and security of the consumers, especially pharmaceuticals and medical devices such as surgery masks, antiseptics etc.

- 7. E-prescriptions**  
20.03.2020
- All medical prescriptions may be obtained through the electronic portal <https://www.e-syntagografisi.gr/p-rv/p> using the taxisnet codes.
- 
- 8. Primary care at home through mobile units**  
20.03.2020
- Mobile units are introduced for the purpose of offering primary care services to patients at home and sampling for Covid-19.
- 
- 9. Sending of pharmaceutical products to patients via courier**  
20.03.2020
- The option of sending pharmaceutical products directly at patients' home by EOPYY's pharmacies via courier services is introduced for the next 4 months provided there is still a risk of Covid-19 spreading.
- The exact procedure to be followed will be set out in a decision of EOPYY.
- 
- 10. Suspension of execution of public procurement contracts**  
20.03.2020
- Option for the competent Minister to issue a ministerial decision with the below measures, which can have duration up to 6 months as from 20 March 2020.
- a) suspension of tendering procedures, b) extension of the submission of the participation petitions or the tender offers in cases whereby the tender has already been published, c) suspension of every time limit regarding the public procurement regardless of the status they are in (award or execution of the contract) and d) extension for all types of contractual deadlines.
- 
- 11. Speeding up the supply of disinfectants**  
26.03.2020
- On 24 March 2020, European Chemicals Agency (ECHA) announced its decision to support EU/EEA authorities to apply derogations from the normal authorisation requirement for biocidal products in order to increase the manufacture and supply of disinfectants on the European market. Companies looking to quickly access the market with their disinfectants that contain an already approved active substance can apply for permission to the relevant national authority by relying on Article 55(1) of the Biocidal Products Regulation (BPR). This provision allows national authorities to give time-limited derogations from the standard product authorisation requirements in situations where there is a threat to public health.
- 
- 12. Exceptional authorisation (marketing and use) of biocidal products of type 1, pursuant to Art. 55 (1) of Regulation (EU) 528/2012**  
26.03.2020
- The National Organisation for Medicines (EOF), taking into account the shortages reported in active substances produced in compliance with Article 95 of Regulation (EU) 528/2012, decided to grant marketing authorisations for products which do not meet the requirements set out in the aforementioned Article of the Regulation.
- 
- 13. Suspension of GMP, GDP and market inspections**  
26.03.2020
- EOF has temporarily suspended all Good Manufacturing Practice (GMP), Good Distribution Practice (GDP) as well as on-site market inspections, in the context of implementation of measures taken to limit Covid-19 spreading. In cases where suspension is not possible, taking into account the nature and necessity of the inspection and upon assessment of the associated risk, on-the-spot inspections/audits related to serious complaints or other emergencies shall be carried out.

- 14. Temporary prohibition of parallel exports and intra-Community movement of medicinal products**  
26.03.2020
- EOF decided to prohibit, temporarily, the parallel exports and intra-Community movement of certain medicinal products whose sufficiency is crucial for the treatment of patients infected by Covid-19 or suffering from other respiratory infections.
- 
- 15. Suspension of private practices**  
26.03.2020
- As a result of the governmental requisition of personal protective equipment, private HCPs across the country may be forced to suspend their private practices in case they run out of the necessary protective equipment such as masks, gloves and antiseptic products.
- 
- 16. Donations' Acceptance Procedure**  
30.03.2020
- For donations of special hospital equipment, personal protective equipment and medicines, performed by any third party, whose acceptance procedure is conducted in accordance with the provisions of the leg act issued on 14.03.2020, solely the notification to the Minister of Finance of the acceptance of said donations (and not its prior approval) is required.
- 
- 17. Establishment of an Audit Committee for Monetary Donations of the Covid-19 Special Account of the Institute of Pharmaceutical Research and Technology (IFET)**  
30.03.2020
- A three-member Audit Committee regarding the realisation of monetary donations of the Covid-19 Special Account is established, having as its core responsibility the recommendation to the Minister of Health of all the necessary actions and measures for the control of the management and utilisation of the funds of monetary donations of the Special Account of IFET.
- 
- 18. Establishment and operation of a National Registry of Covid-19 Patients**  
30.03.2020
- The establishment and operation of a National Registry of Covid-19 Patients aims at protecting public health in view of the high impact of the virus on the general population, the need to record epidemiological data, pharmacovigilance and surveillance of the private healthcare providers.
- 
- 19. Approval of off-label administration of medicines to Covid-19 patients**  
30.03.2020
- Provided that there is an imminent public health risk from the spread of Covid-19 and in the absence of approved appropriate treatment against Covid-19, in accordance with the pharmaceutical legislation, the Minister of Health may decide for the administration, mainly to patients that belong to vulnerable groups, of medicines that have been authorised for another indication and are likely to be effective in combating Covid-19, following the procedure and the requirements provided by this Act.
- 
- 20. Administration of medicines in the context of urgent temporary early access to non-approved medicines to Covid-19 patients**  
30.03.2020
- Any executed medical prescription that is related to the administration of medicines for non-approved indications (off-label use) to Covid-19 patients shall be reimbursed without requiring reimbursement approval before receiving said medication, except in cases of urgent temporary early access to non-approved medicines, where the cost shall be covered by the "Responsible Person" of the scheme.

- 21. Covid-19 patients' medication**  
01.04.2020
- Any executed medical prescription that is related to the administration of medicines for non-approved indications (off-label use) to Covid-19 patients shall be reimbursed without requiring reimbursement approval before receiving said medication, except in cases of urgent temporary early access to non-approved medicines, where the cost shall be covered by the "Responsible Person" of the scheme.
- 
- 22. Donation of pharmaceutical products to address urgent needs**  
01.04.2020
- By its announcement, EOF underlined that donations of medicines are still effected according to the simplified procedure of operating Circular **57386/17-7-2013**, with the mention that the Marketing Authorisations Holders (MAH) may immediately proceed with the realisation of the donation, bypassing the 15-day waiting period from the notification to EOF's Traffic Control Department. EOF clarified that the above facilitation is adopted solely for reasons of immediate coverage of the extraordinary needs as a result of Covid-19 spreading.
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- 23. Restrictions on exports of disinfectants**  
08.04.2020
- The Independent Authority for Public Revenue (AADE) proceeded with the ban on the export of disinfectants in the context of extraordinary measures adopted to tackle the spread of Covid-19. The obligation of exclusive supply and disposal of said products in the Greek territory as well as the prohibition of their export applies both to producers and resellers.
- 
- 24. Initiation of the National Registry of Covid-19 Patients**  
10.04.2020
- By their joint press release, the Ministries of Health and of Digital Governance announced that the National Registry of Covid-19 Patients, provided in the leg act issued on 30.03.2020, is entered into operation. The Registry shall include all necessary information and data to combat the pandemic and thus, shall serve as a single point of reference for all outbreaks of the virus.
- 
- 25. Procedure for the acceptance of donations to EODY to combat Covid-19 pandemic**  
13.04.2020
- By virtue of the latest leg act, the President of the National Organisation for Public Health (EODY) is enabled to accept monetary donations or donations in kind that can be used in the tracking of Covid-19 cases by third parties. Acceptance of said donations is effected without delay with a declaration of acceptance of the President of EODY. Indicatively, within the scope of donations in kind may fall personal protective equipment, protective clothing, means of transport and vehicles, fixed electronic telephone or teleconferencing equipment, as well as computers. This process of donations acceptance applies as well to donations that took place before the entry into force hereof and in any case after the entry into force of the leg act issued on 25.02.2020.
- 
- 26. In-home or remote provision of health care services by EOPYY HCPs or GPs to Covid-19 patients**  
13.04.2020
- In the aim of protecting public health and restricting the spread of Covid-19, EOPYY HCPs as well as GPs may proceed to home visits or provide remote health services to both insured and uninsured Covid-19 patients that remain at home. For the period that this measure is in force, Article 16 of the leg act issued on 13.04.2020 provides for special provisions for the HCPs compensation, in derogation of the general rules applicable to EOPYY HCPs and GPs.
- 
- 27. Provisions for the procedure of e-prescriptions issuance**  
13.04.2020
- HCPs issuing e-prescriptions, according to the pertinent provisions of the leg act issued on 20.03.2020, shall include in the respective monthly submission to EOPYY the required visit form where the number of the e-prescription shall be indicated, without signature of the insured for their reimbursement.

- 28. Provision of healthcare services through digital means**  
13.04.2020
- By a joint decision of the Ministers of Health and Digital Governance, digital infrastructure and services may be used to provide advice, guidance and support to patients, who have been diagnosed with Covid-19 and remain at home, throughout their monitoring. The Minister of Health may decide on the use of the aforementioned infrastructure and systems for the remote advice and e-monitoring by GPs of patients suffering from chronic illness with other underlying medical conditions.
- 
- 29. Electronic Preapproval System**  
13.04.2020
- Article 20 of this Act provides for the amendment of Article 265 of the Greek 4512/2018 by addition of par. 3. In particular, the new paragraph stipulates that all requests related to the administration of medicines for non-approved indications, even if said requests concern insured falling under the competence of different Social Security Organisations, are submitted as well to the Electronic Preapproval System of EOPYY. The relevant procedure of examination for the administration requests of EOPYY's insured applies, mutatis mutandis, in the latter case. However, the aforementioned approval does not entail the undertaking of the insurance coverage by EOPYY. Ministerial Decision 154/2012 on "Pharmaceutical preparations other than approved indications" is abolished.
- 
- 30. Conclusion of contacts by EODY**  
13.04.2020
- Provided that there is an imminent public health risk from the spread of Covid-19 and in any case for a period which may not exceed 4 months, EODY may, by way of derogation from all applicable national provisions on recruitment and public procurement, conclude contracts for a series of cases listed in Article 22 of this Act, including, inter alia, supply of electronic incident management system, purchase of case sampling bags, contracts for supplies or services concluded under the indirect costs of the Act, as specified in the respective technical bulletin etc.
- 
- 31. EOF's Announcement on hand disinfectants and the legal framework governing their marketing**  
21.04.2020
- With regard to the licence for antiseptic manufacturing for the treatment of the Covid-19, according to article 5 of the Greek Law 4681/2020, enforcement of provisions of case (d) of paragraphs 1 and 2 of Article 3 of the Greek Law 1316/1983 (providing for EOF's competence in granting, suspending or revoking said licences and imposing administrative penalties respectively), are suspended for 6 months, exclusively for companies that already hold a licence to manufacture pharmaceutical or cosmetic products and solely for the production of disinfectants of type 1 for human use either in liquid or gel form or impregnated wipes, the marketing and use of which is governed by EU Regulation 528/2012.
- The above companies may produce the above products exclusively for their disposal in the Greek territory and are obliged to comply with all rules on safety of products and informing the public as to their use and characteristics. The obligation of exclusive supply and disposal of said products in the Greek territory as well as the prohibition of their export applies both to producers and resellers.
- 
- 32. EOF's Announcement on the tests for Covid-19 detection**  
21.04.2020
- By its announcement, EOF clarifies that the tests for Covid-19 detection (the so-called "rapid tests"), fall within the scope of medical device and therefore, prior notification to EOF's Electronic Medical Device Registry of all data enabling their identification, is a prerequisite for their marketing.
- The announcement provides in detail for the documents that must be included in the notification and clarifies that labeling as well as instructions for use must be complete, accurate and in Greek. Said requirements must be fulfilled before the products are marketed in the Greek territory and, as such are available to consumers.

### 33. Acceptance of donations of medical devices of any kind to combat the outbreak of Covid-19

01.05.2020

By virtue of the latest leg act issued on 01.05.2020, the Minister of Health may accept donations of medical devices of any kind to combat the outbreak of Covid-19 by any third party, either individual or legal entity, according to the procedure and the conditions set out in Article 8 of the leg act issued on 14.03.2020, as amended and in force.

### 34. Update of the National Registry of Covid-19 Patients- Access to data of the General Secretariat for Civil Protection

[01.05.2020]

At the beginning of the operation of the National Registry of Covid-19 Patients, its update may be effected by granting, retroactively, data to the e-Government Centre for Social Security (IDIKA), which have come to users' knowledge for tracing purposes, and refer to all confirmed cases. To this effect, the General Secretariat for Civil Protection may have access to the following data regarding the course of the hospitalised patients: (a) the type of bed where each patient is treated (ICU, HDU, simple) as well as any changes and (b) the outcome of the treatment (discharge due to treatment or death).

## 6. Employment

### 1. Special leave for parents

07.05.2020

- Following the temporary suspension of the operation of all educational institutions in Greece, a special purpose paid leave has been established **until 10 May 2020 (as extended)**.
- Employees with children, as defined in the relative leg act, are entitled to a minimum of 3 days of said leave on condition that they use 1 day of their annual leave for every 3 days of the special leave.
- The Greek State will subsidise part (1/3) of the employees' remuneration during such special leave through reimbursement of the relevant cost to employers.
- With respect to the use of such leave within March, April and May employers are obliged to file a special declaration via the ERGANI platform between 1 and 15 June.
- If said measure is further extended, the relevant declaration must be submitted by the 15th of the month following the granting of the special leave.

- Further details are provided for in Article 4 para. 3 of the leg act issued on 11.03.2020, a circular issued by the Ministry of Labour on 12.03.2020 and a Ministerial Decision dated 06.05.2020.

- The duration of this measure may be further extended depending on the circumstances.

### 2. Special provisions on telework

27.04.2020

- Employers may unilaterally impose a system of remote working **until 31 May 2020 (as extended)**.
- By the 10<sup>th</sup> of the month following the implementation of the measure, employers are obliged to file a special declaration via the ERGANI platform.
- **The deadline for the notification by employers to ERGANI of remote work which took place in March has been extended until 10 May.**

The duration of this measure may be further extended depending on the circumstances.

### 3. Notifications to ERGANI platform 27.04.2020

- The employers' obligation to notify in advance, via the ERGANI platform, the authorities of any change of the employees' working hours (including remote working, overwork or overtime) is suspended **until 31 May 2020 (as extended)**.
- For the duration of the above measure employers are obliged to notify such changes within the first 10 days of the following month.

The duration of this measure may be further extended depending on the circumstances.

### 4. Special provisions on overtime work 20.03.2020

- Overtime which exceeds 120 hours per year does not require the prior issuance of a special permit by the Ministry of Labour.
- In any event, such overtime cannot exceed the daily lawful limits.

This measure will remain in force during the crisis and for a maximum of 6 months as of 14 March 2020.

### 5. Exception from the prohibition of work on Sundays 20.03.2020

Employees of businesses active in the areas of production, transport and supply of food, fuel, medicines and paramedical products to retailers selling those products are exempted from the prohibition of work on Sundays and public holidays.

This measure will remain in force during the crisis and for a maximum of 6 months as of 14 March 2020.

### 6. Safe operation staff 20.03.2020

Employers **belonging to the specific impacted categories announced by the Ministry of Finance** may impose a system of work based on a "safe operation staff", as follows:

- Each employee may work for a minimum of 2 weeks per month, either continuously or in parts.
- The above organisation of work takes place on a weekly basis and must cover at least 50% of total staff.
- During such measure employers are prohibited from making any dismissals and must maintain the same employees under the same terms of employment, with the exception of those employees who resign or retire.
- Employers who follow the above system of work, whether in combination with the measure of suspension or not, are obliged to file a special declaration via the ERGANI platform within the first 10 days of the following month.

- This measure will remain in force during the crisis and for a maximum of 6 months.
- Further details are provided for in the ministerial decision issued on 03.04.2020.

### 7. Intragroup transfer of employees 09.04.2020

- Employers who are severely impacted by the crisis or have been on a temporary lockdown by order of the authorities may provisionally transfer personnel to other companies of the same group.
- During such measure employers are prohibited from making any dismissals and must maintain the same employees under the same terms of employment, with the exception of those employees who resign or retire.
- Employers who proceed to such intragroup transfers, whether in combination

with the measure of suspension or not, are obliged to file a special declaration via the ERGANI platform within the first 10 days of the following month.

- **The deadline for the notification by employers to ERGANI of any intragroup transfers which took place in March has been extended until 10 May.**

Further details are provided for in the ministerial decision issued on 03.04.2020.

#### **8. Suspension of employment contracts by employers on lockdown by order of the authorities** 31.03.2020

- The lockdown imposed by the authorities constitutes an event of force majeure and releases employees from the obligation to provide services and their employers from the obligation to pay salary. During the lockdown period the employment contracts are suspended.
- Fixed-term employment contracts, which were due to expire after the lockdown, are also suspended and continue after the lockdown is lifted for the remaining of their term.
- All unpaid leaves agreed between employers and employees are revoked as from 28 March 2020 and the respective employment contracts are placed on suspension.
- Starting from 18 March 2020, employers whose businesses have been temporarily locked down by order of the authorities are prohibited from making any dismissals during the lockdown period. If effected, such dismissals are invalid.

Further details are provided for in the Ministerial Decision published on 28.03.2020.

#### **9. Extension of suspension of employment contracts by employers on lockdown by order of the authorities** 31.03.2020

- If the lockdown is extended during May 2020, the suspension of employment contracts is equally extended for the period of the continued lockdown.
- During the extension, employees will be entitled to a special state benefit, prorated to the period of the extension.

Further details for the implementation of the above will be provided by ministerial decision.

#### **10. Suspension of employment contracts by employers severely impacted by the crisis** 09.04.2020

- Employers belonging to the specific impacted categories announced by the Ministry of Finance may suspend the employment contracts of all or part of their employees for an uninterrupted period of 45 days. Such option can be exercised one-off or progressively between 21 March 2020 and 20 April 2020.
- Fixed-term employment contracts expiring after 21 March 2020 can also be suspended, in which case their term is continued after the suspension period.
- During the suspension period employers are prohibited from dismissing any of their employees. If effected, such dismissals are invalid.
- Employers who make use of the above measure are obliged to maintain the same employees under the same terms of employment as at 21 March 2020, for a period equal to the suspension period. Such restriction does not cover employees who resign, retire or whose fixed-term contracts expire.
- Employers, who suspend part of their employees as above, may, in parallel, make use of the other support mechanisms for the rest of their personnel, i.e. operation under "safe operation staff" and intragroup transfer of employees.

- Teleworking employees are excluded from the above suspension mechanism as they continue to provide their services to the employer. By way of exception, employers may agree with part (not in excess of 10%) of their suspended employees to provide telework in order to cover temporary needs of the business. Such telework must be notified through the ERGANI platform prior to its commencement and remunerated pro rata, up to the total amount of the employee's normal remuneration, while employers must also cover the respective social security contributions.

Further details are provided for in the Ministerial Decision published on 28.03.2020 and 03.04.2020 respectively.

#### **11. Extension of suspension of employment contracts by employers severely impacted by the crisis** 07.05.2020

- Employers belonging to the specific impacted categories announced by the Ministry of Finance, who have suspended the employment contracts of all or part of their employees, may extend the suspension of up to 60% of said employees for a maximum of 30 days and in any event not beyond 31 May 2020. If the percentage above is exceeded, employers are liable for paying themselves the remuneration to the employees exceeding such percentage.
- During the extension, employees will be entitled to a special state benefit, prorated to the period of the extension.
- Employers who make use of the above right are prohibited from making any dismissals until 31 May 2020 and must maintain the same number of employees under the same type of employment contract for a period of 45 days following the expiry of the extension.

Further details for the implementation of the above will be provided by ministerial decision.

#### **12. Permanent revocation of the suspension of employment contracts** 07.05.2020

- Employers who have suspended the employment contracts of all or part of their employees may proceed to the revocation of at least 40% of suspended contracts on condition that the suspension has lasted at least for 15 days.
- If revoked, such employment contracts cannot be suspended again, while affected employees are entitled to the special state benefit prorated to the days of the suspension.
- Employers on lockdown by order of the authorities are excluded from the right of permanent revocation.

Further details for the implementation of the above will be provided by ministerial decision.

#### **13. Temporary revocation of the suspension of employment contracts** 07.05.2020

- Employers on lockdown by order of the authorities or belonging to the specific impacted categories announced by the Ministry of Finance may temporarily revoke the suspension of employment contracts in cases of exceptional, urgent and inflexible business needs that cannot be postponed.
- During such revocation period employees are entitled to their normal remuneration prorated to the number of days worked.
- Employers who proceed to such temporary revocation are obliged to file a special declaration via the ERGANI platform prior to the commencement of the exceptional work to be provided.
- After the temporary revocation period expires, the suspension of the employment contract continues until it is fully completed, i.e. the suspension period is extended by the number of days of the temporary revocation.

Further details for the implementation of the above will be provided by ministerial decision.

#### 14. Special state benefit 07.05.2020

- Employees whose employment contracts have been suspended either following a lockdown by order of the authorities or a decision of their employer as per the previous paragraph are entitled to a special state benefit of EUR 800. Such benefit covers a suspension period of 45 days during which the employees are entitled to full social security coverage, borne by the State.
- The same state benefit is due also to employees who have been terminated or resigned during the period from 1 to 20 March 2020.
- Employers on lockdown by order of the authorities are obliged to declare the suspension of their activities and the affected employees through the ERGANI platform by 10 April 2020 (as extended). Failure to do so results in the exclusion of the employers from various relief measures provided for impacted businesses. By 10 April 2020 employers must also inform their employees in writing or by email about the submission of the above declaration so that employees also submit their required application to the electronic platform of the Ministry of Labour.
- Employers belonging to the specific impacted categories announced by the Ministry of Finance exercising their right to suspend the employment contracts of all or part of their employees are obliged to declare their affected employees through the ERGANI platform within the period between 21 March 2020 and 20 April 2020; otherwise, they will not be eligible for the various State measures available to impacted businesses. Employers are required to inform on the same day their employees in writing or by email about the submission of such declaration so that they can also submit the required application to the respective platform. Employers, who do not place any employees on suspension, although entitled to, remain eligible for the other relief measures available to impacted businesses. Said employers can pay to suspended employees an amount on top of the special state benefit up to their gross monthly remuneration, in which case the employers must also cover the respective social security contributions.
- During any extension of the suspension of their employment contracts, employees will be entitled to a special state benefit, prorated to the period of the extension. Further details for the implementation of the above will be provided by ministerial decision.

Further details are provided for in the Ministerial Decision published on 28.03.2020 and a circular issued by the Ministry of Labour on 07.04.2020.

#### 15. Special provisions on Easter allowance 31.03.2020

- Employers on lockdown by order of the authorities or belonging to specific categories, as defined by the Ministry of Finance, who have been severely impacted by the crisis, are entitled to pay the Easter bonus at a later date than its due date, i.e. Holy Wednesday, and in any event latest on 30 June 2020.
- Given that the lawful reference period for the calculation of the Easter allowance runs from 1 January until 30 April each year, the employer shall pay the portion of the allowance corresponding to the period from 1 January until the day of suspension (if any), while the portion of the allowance corresponding to the remaining part of the reference period shall be paid by the State.
- The Easter allowance for employees on suspension shall be calculated on the basis of their salary or daily wage paid on the last day prior to the suspension of the employment contract.

Further details will be set out in a Ministerial Decision.

- 16. Adaptation of employees' working time to opening hours**  
07.05.2020
- Employers previously on lockdown by order of the authorities or belonging to the specific impacted categories announced by the Ministry of Finance may adapt, following the lifting of the lockdown, the working time of their employees to their opening hours.
  - Such adaptation may take place on condition that there is no change to the type of the employment contract of said employees.
- 
- 17. Extension of regulatory terms of collective labour agreements and arbitration awards**  
07.05.2020
- The regulatory terms of collective labour agreements and arbitration awards, whose statutory 3-month extension period expired between 29 February and 30 April 2020, shall remain in effect until 30 June 2020.
- 
- 18. Measures for the protection of health and safety and the prevention of the spread of Covid-19 at the workplace**  
07.05.2020
- A circular issued by the Ministry of Labour on 4 May provides for specific measures for the prevention of the spread of Covid-19 in view of the employer's obligation to ensure health and safety at the workplace. Such measures are divided into 4 categories: a) organisational measures, b) personal hygiene measures, c) environmental measures and d) measures for monitoring employees' health.
  - More specifically, organisational measures that must be adopted by the employers include indicatively the organisation of working time so as to avoid overcrowding, imposition of telework (where possible), reorganisation of workplace ensuring the necessary distancing as per legal requirements, avoidance of face-to-face meetings and regular provision of information to employees, especially as regards actions to be taken in case of Covid-19 symptoms.
  - Personal hygiene measures impose specific obligations both on employers and on employees. Such measures include indicatively the obligation of employers to install appropriate hygiene equipment, such as washing basins and sanitising hand rub dispensers, provide employees with appropriate personal protection equipment, such as face masks, while employees are required inter alia to observe the necessary hygiene measures and inform employers in case they experience Covid-19 symptoms or in case of contact with a Covid-19 case.
  - Environmental measures include the implementation of appropriate ventilation and cleaning procedures, as well as disinfection in case of a confirmed Covid-19 case.
  - Measures that monitor employees' health include employers' obligation to develop a process for the handling of a confirmed Covid-19 case at the workplace, as well as the introduction of protective measures for high risk employees. Employers are also required to take reasonable care for employees' mental health.
  - Lastly, employers should complete a self-appraisal form to ensure compliance with the applicable health and safety measures.

## 7. Data Protection

- 1. Processing of health data of visitors and employees**  
20.03.2020

Data controllers are permitted to collect health data of visitors or employees to building premises in order to safeguard public health under certain conditions. The Hellenic Data Protection Authority (HDPa) has made specific mention of measuring body temperature and handing out questionnaires on symptoms.

On 18.03.2020 the HDPa issued Guidelines on personal data processing in the context of combatting Covid-19 in which it supported that data protection legislation should not constitute an obstacle in the fight against this pandemic. Data controllers have increased flexibility to process health data, but the obligations of the GDPR are still applicable.
- 2. Processing travel data of visitors or employees**  
20.03.2020

Data controllers are legally permitted to gather specific information on a visitor or employee's recent travel destinations as well as of the people they have come in contact with, but the obligations of the GDPR are still applicable.
- 3. Disclosure of epidemiological data**  
20.03.2020

In order to respect for the public's right to information, data controllers are permitted to disclose to public health authorities that a subject has contracted Covid-19 by sharing only the necessary information.
- 4. Disclosure of borrower personal data to financial institutions**  
30.03.2020

By virtue of the leg act of 30.03.2020, Greek ministries shall be allowed to disclose identification data of the individuals and legal entities that are beneficiaries of the state financial aid distributed due to the effects of the pandemic, to banks, credit institutions and loan servicing companies, unless the concerned persons object to the disclosure of their personal data until 08.04.2020 by sending a relevant message at [www.keyd.gov.gr](http://www.keyd.gov.gr). The data can be used by the abovementioned entities exclusively for the purpose of offering favorable settlements and repayment terms to the borrowers.
- 5. Establishment of the National Registry of Covid-19 Patients**  
30.03.2020

  - For the effective combat against the pandemic, a National Registry of Covid-19 Patients ("the Registry") is founded. The Registry shall consist of a list of individuals that have been diagnosed as positive to Covid-19 and shall include the name, age, sex, current disease status and health condition of each patient.
  - On 08.04.20, a change to the draft law ratifying the leg act of 30.03.2020 added the patients' Social Security Number to the list of personal data being processed in the Registry in order to increase transparency and efficient tracing of Covid-19 cases.
  - For purposes of data protection, the Ministry of Health shall act as Data Controller and the e-Government Centre for Social Security (IDIKA) shall act as Data Processor.
  - All healthcare organisations and healthcare providers in Greece, including hospitals, private clinics and doctors, are mandated to keep the Registry updated without undue delay. Failure of compliance with this obligation may lead, as regards legal entities, to the temporary or permanent revocation of licence of operation and, with respect to private doctors, to disciplinary actions.
  - The disclosure of the personal data included in the Registry to insurance and banking companies is explicitly prohibited, whereas such prohibition may not be lifted even with the consent of the affected individual.

- The operation of the Registry is governed by detailed rules that aim to protect the personal data of the patients, which are set forth in the joint Ministerial Decision of Health and State No. 2650/10.04.2020. It shall function as a web platform integrated with all other e-Health services of the country. Patients whose data is being processed in the Registry can exercise all rights provided to data subjects in the GDPR and the Greek data protection law, as well as any rights provided related to the e-Prescription System, which is already in place (Ministerial Decision of Health 2649/14.04.2020).
- IDIKA undertakes many responsibilities as a processor including record-keeping, performance of Data Protection Impact Assessments and implementation of security measures, such as encryption and action logging.
- The healthcare providers that are under the obligation to report confirmed cases of Covid-19 in the Registry must follow a specific procedure by using a template electronic document, which shall include certain information set forth in detail in the Ministerial Decision mentioned above.
- User access to the platform will be strictly regulated and each professional will only have access to data relevant to their activities. Each patient's data shall be retained for a lifetime plus an additional period of 20 years.
- Pursuant to Ministerial Decision of Health 2649/14.04.2020, one of the purposes of the Registry is to share epidemiological data with the relevant EU Registry of covid-19 patients and the Ministry of Health shall conduct such disclosures of data in compliance with all applicable data protection legislation.

The establishment and role of the Registry is provided in Article 29 of the leg act of 30.03.2020, which also includes the necessary privacy notice required under Article 14 of the GDPR and the responsibilities of IDIKA as a processor. The unlawful processing of personal data included in the Registry may lead to severe criminal sanctions. Further details on the operation of the Registry, the obligation of IDIKA as processor, the technical measures that should be implemented, access rights and data retention periods are set forth in the joint Ministerial Decision of Health and State No. 2650/10.04.2020. The Registry is founded pursuant to Ministerial Decision of Health No. 2649/14.04.2020.

## 6. Mobilisation of EU data protection bodies 09.04.2020

On 07.04.2020 the European Data Protection Board (“EDPB”), which is the EU body assigned with the task of the consistent application of the GDPR, stated in its plenary meeting that it will prioritise and speed-up the publication of a guidance on the processing of personal data in the context of Covid-19, that will focus on the following issues: (a) the processing of health data for advanced scientific research and (b) the fair use of geo-location and tracking tools employed against the pandemic.

Additionally, on 06.04.2020 the European Data Protection Supervisor (“EDPS”), which is the EU independent data protection authority that monitors the processing of personal data by EU institutions and bodies, made a public statement, in which the EDPS called for “digital solidarity” of the EU in times of crisis, committing that the EDPS will work alongside national authorities to ensure the protection of citizen privacy and he invited the tech industry to build tools which implement privacy by design. Considering that most EU states are in the process of developing applications to combat the pandemic, the EDPS also called for a unified Pan-European development of a “Covid-19 mobile application” in coordination with the World Health Organisation.

- 7. Provision of health services with digital means for Covid-19 patients**  
13.04.2020
- By virtue of leg act 13.04.2020, patients of Covid-19, who have been instructed to stay under lockdown, will be provided virtual health services by their doctors. As is the case with all health services, the patient's consent is required. If the patient is in no position to provide said consent, the relatives or other companions who live together with the patient will be able to consent on his/her behalf. Processing of the patient's sensitive data will be subject to the obligations set out in the GDPR and Greek Law 4624/2019.
- A Joint Ministerial Decision (Health & Digital Governance) is expected to provide the details of the virtual health application as well as the measures implemented to protect patients' personal data.
- 
- 8. Customer due diligence measures will be performed digitally**  
13.04.2020
- By virtue of leg act 13.04.2020, natural persons who are subjected to verification of identity and source of income by entities who are obliged to take customer due diligence measures (pursuant to EU Directive 849/2015 on "prevention of money laundering and terrorist financing") can apply digitally to disclose that information to the financial institution of their choice through the Single Digital Portal of Public Administration. Access to the application will be effected with TAXISNET credentials and based on the consent of the user.
- EU Directive 849/2015 has been implemented with Greek Law 4557/2018. A Ministerial Decision of Digital Governance is expected to set forth the details of personal data processing taking place through the digital application.
- 
- 9. Guidelines on tele-working by the HDPA**  
15.04.2020
- The HDPA is taking steps in ensuring that the processing of personal data in the context of tele-working is compliant with applicable legislation. Employers should take all appropriate steps to adequately inform the employees, considering that not everyone has the same degree of familiarity with new technologies. Additionally, employees have an increased expectation of privacy when working at home. The guidelines focus on issues of safe network access, data storage, secure use of email and safe conduct of teleconferences.
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- 10. EU Commission calls for a unified approach in mobile contact-tracing apps**  
16.04.2020
- In order to facilitate the gradual lifting of social distancing and confinement measures, the EU Commission has published guidance on the use of contact-tracing apps, highlighting the importance of respecting data security, confidentiality and privacy of EU citizens. Among the privacy safeguards being promoted are: (i) use of anonymised data to avoid stigmatisation, (ii) use of Bluetooth data instead of GPS in order to avoid location tracking of individuals, (iii) retention of data limited to the duration of the crisis and (iv) interoperability of apps between member states.
- The Commission developed a "toolbox", in cooperation with the eHealth Network, with actionable advice to help member states develop the contact tracing apps. It can be found [here](#). Additionally, the European Data Protection Board (EDPB) adopted and published a letter in support of the Commission's initiative laying down its own considerations for the lawfulness of processing through mobile apps in general and the relevant security measures to be adopted. In particular, the EDPB highlighted the necessity for such apps to be fully voluntary for users and for their source code to be open, in order to allow for scrutiny of the algorithms employed.

**11. The European Data Protection Board publishes Guidelines 03/2020 on the processing of health data for scientific purposes in the context of the Covid-19 outbreak**  
21.04.2020

Identifying the need for international cooperation in medical research for the SARS-COV-2 virus, the EDPB published and adopted guidelines to help the scientific community battle the pandemic while also respecting the data protection rights of EU citizens. The main points laid down in the guidelines are the following:

1. The GDPR should be no obstacle in research but the special rules for processing of health data for scientific purposes, the rules on data subject rights and the fundamental principles of the GDPR and national data protection laws are still applicable.
2. For specific legal bases concerning scientific research and for restrictions in data subjects' rights, the data controller should apply the GDPR in conjunction with national law. Exceptions and restrictions should be applied only when strictly necessary.
3. A Data Protection Impact Assessment (DPIA) should be carried out where necessary and adequate security measures should be applied.
4. International data transfers should be performed in compliance with the GDPR and derogations should be made only exceptionally and for non-repetitive transfers.

**12. The European Data Protection Board publishes Guidelines 04/2020 on the use of location data and contact tracing tools in the context of the COVID-19 outbreak**  
22.04.2020

The EDPB shares its expertise with governmental and private actors on how to effectively develop mobile applications that help the EU combat the pandemic while protecting the privacy of the users. The guidance concerns applications that use:

- Use location data of users to model the spread of the virus and/or;
- Use contact tracing to alert users when they have been in proximity with an infected or recently infected person.

As far as location data is concerned the EDPB highlights the importance of adhering to the rules laid down in the "ePrivacy" Directive EC 58/2002. The anonymisation of personal data is an essential tool to effectively transmit location and traffic data to public institutions. Anonymisation should be effected on entire data sets to eliminate the possibility of identification of individuals.

On the issue of contact tracing apps, they should use only proximity based technologies and adhere to data minimisation: no tracking of any individual's location history. Strict security measures are also of paramount importance, especially if the developer of the app is using a centralised server.

In regards to all apps, the Guidelines provide for the need for a DPIA, data encryption techniques, auditability of algorithms and that they should only be used on a voluntary basis.

The EDPB Guidelines 04/2020 provide for a detailed list of technical specifications for such mobile applications and an analysis of their desired functions. Still, using location and proximity data is a high-intensity processing activity with numerous risks for the rights and freedoms of individuals. Private entities looking to develop such applications should make sure to consult a privacy professional.

## 8. Real Estate

- 1. Reduction of rents by 40%**  
23.03.2020

Legal entities and individuals affected by Covid-19 (i.e. entities the business of which has closed by virtue of the recent government measures and the employees thereof) are entitled to pay 60% of the rent of the months of March and April for their premises and residence respectively, while landlords are not entitled to terminate the lease due to partial payment. Deadline for the submission of the relevant declaration to ERGANI platform (please see above under Employment) had been extended until 10.04.2020.

By virtue of a recently enacted amendment, the foregoing 40% rent reduction has been extended also to entities the activity of which is designated as “affected” by the Covid-19-related measures, and cover the rent of April. Accordingly, it applies to the commercial leases of the business, as well as to the residential leases of their employees whose employment agreement has been suspended.

According to a press release dated 30.4.2020 of the Ministry of Finance, legal entities affected by Covid-19 as above and the employees thereof whose employment agreement is suspended, are entitled to pay 60% of the rent of May. This measure will also cover the rent of family members (i.e. students) dependent on above employees. Businesses which shall reopen within May will not benefit from such reduction the following months.

The owners of leased assets will enjoy tax benefits and reductions. Please refer to *section 11 below*.

- 2. Force majeure impact on rents**  
23.03.2020

It needs to be assessed on a case-by-case basis whether and to which extent legal entities and individuals affected by the Covid-19, but not closed by virtue of the recent Government measures, can negotiate decrease of their rent with the landlords on the grounds of force majeure.

Please also refer to *section 11 below*.

- 3. Reopening of the Land Registries and Cadastral Offices**  
25.04.2020

By virtue of leg act dated 25.04.2020 the Land Registries and Cadastral Offices have reopened as of 28.04.2020 and special conditions for their operation are applicable until 15.05.2020. During this period the following will need to be observed: 1) recommendation to the public for the use of masks, 2) provision of antiseptic products in all public spaces, 3) observance of the safe distance obligation of at least 1.5 m. and 4) limitation of the persons simultaneously present in closed spaces to 1 person per 10 sq. m. To this end, each Land Registry and Cadastral Office will issue a relevant decision with the measures ensuring safe operation thereof according to social distancing and public health requirements. Indicatively, as per the relevant decision of the Land Registry of Athens (the largest in Greece), all visitors need to wear a protective mask and keep a safe distance. Further, the opening hours of its offices is restricted and a limited number of persons may be simultaneously admitted in order to use its facilities to conduct legal due diligence, to file deeds and acts for registration, to submit of applications certificates and deed copies, etc. Further, any meeting with the Head of the Land Registry is possible by appointment only.

- 4. Force majeure impact on notarial and private pre-agreements for real estate purchases**  
22.03.2020
- Notarial pre-agreements for the purchase of real estate that are in place and provide for the execution of the final transfer deed on a specific date or set a deadline will need to be reviewed in order to assess the consequences of the lapse of relevant date/deadlines due to Covid-19 in conjunction with all applicable statutory measures on the suspension or extension of such date/deadline.
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- 5. Impediments on securities on financing arrangements**  
23.03.2020
- It is anticipated that the reopening of the land registries in combination with the reopening of the first instance courts will allow banks to start drawing funds since the registration of the in rem security with the land registry/cadastre is now possible.
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- 6. Postponement of the posting of the cadastral maps of Athens**  
19.03.2020
- The National Cadastre has announced that the posting of the cadastral maps and relevant data for the city of Athens is postponed and will begin as of 01.06.2020.
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- 7. Extension of the deadline for the accurate declaration of real estate for municipal tax purposes**  
11.03.2020
- The deadline for the submission of declarations (or submission of amendments to previous inaccurate declarations) towards the Municipal authorities for the calculation of municipal taxes and duties regarding the surface and use of owned real estate assets has been extended from 31.03.2020 to 30.06.2020.
- 
- 8. Inclusion of real estate related businesses to affected businesses list**  
30.03.2020
- Real estate agencies, as well as real estate management and construction companies, have been included in the list of affected businesses that benefit from Covid-19-related measures regarding mainly tax, social security and employment issues (please refer to sections 6, 11 & 12).
- 
- 9. Partial reopening of the Courts**  
25.04.2020
- By virtue of leg act dated 25.04.2020, the operation of the Courts is further suspended until 15.05.2020. By way of exception, applications for the registration, uplifting or amendment of prenotations of mortgage will be processed, without a public hearing before a sitting Judge for social distancing purposes, but through a written procedure. For further details, please refer to section 10 below.

## 9. Tourism & Leisure

- 1. Issuance of credit notes from tourism businesses companies**  
13.04.2020
- By virtue of leg act dated 13.4.2020, in case of termination of contracts effected from 25 February 2020 until 30 September 2020 as a result of the Covid-19 pandemic, tourism enterprises are entitled - instead of returning the premature payments (prepayments, earnest money deposits etc.) to the clients in case such an obligation is provided in the relevant contract - to exceptionally issue credit notes of equal value (the so-called "vouchers"). The vouchers are valid for an 18-month period. Relevant measures refer to refunds payable both from tourism businesses to customers and from one tourism business to another, located either within or outside EU borders. The above provisions apply both to contracts which are subject Greek law and to contracts which are subject to foreign law, provided that the relevant rights are also provided under EU laws; however, it is questionable whether such provision is enforceable.

## 10. Dispute Resolution

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| <b>1. Pending hearings of legal actions</b><br>27.04.2020   | <p>Court hearings are cancelled during the suspension period of the court operations with the exception of certain criminal court hearings of urgent nature; such suspension period lasts from 13.03.2020 until 15.05.2020. After such date, the hearings will be rescheduled but a reasonable delay from 6 to 12 months is expected, subject to the court's backlog.</p>   |
| <b>2. Statutory deadlines for filing pleadings</b><br>27.04.2020  | <p>During the suspension period no pleadings or case files are submitted with the court; all deadlines along with the statutory limitation periods which would normally lapse within the suspension period are extended for an equal number of days as from the end of such suspension.</p>   |
| <b>3. Injunction and interim orders</b><br>27.04.2020   | <p>Injunction hearings are cancelled during the suspension period, except for injunction petitions concerning registration, release or amendment of prenotation of mortgage, provisional seizure, judicial sequestration, sealing and unsealing of assets, registration of inventory and public deposit, and European orders of seizure.</p> <p>Interim orders are exempted from such suspension and the respective hearings take place before the presiding judge, in the defendant's absence. The effect of interim orders which were granted before the suspension period and remain in force until the hearing of the injunction measures is automatically extended by the competent Judge even if the injunction hearing is cancelled.</p> |
| <b>4. Enforcement proceedings</b><br>27.04.2020   | <p>Enforcement proceedings, including public auctions, are also suspended, from 13.3.2020 to 15.05.2020.</p>  |
| <p>As regards public auctions and once the suspension measures are lifted, the creditors will have to proceed to submission of a notice to continue the auction. The new auction date will be set by the notary public, within two to three months following such notice.</p> |   |
| <b>5. Protection of main residency</b><br>05.05.2020  | <p>The deadline for applying for the main residence protection regime is extended until 31.07.2020.</p>   |

## 11. Tax

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| <b>1. Extension of VAT payment</b><br>01.05.2020 | <ul style="list-style-type: none"> <li>- Payment of VAT amounts due between 11.03.2020 to 30.04.2020 is extended until 31.08.2020.</li> <li>- This concerns enterprises ("<i>affected enterprises</i>"):             <ul style="list-style-type: none"> <li>- with active primary Business Activity Codes (KAD) included in the revised list of KAD published on 01.05.2020 or whose turnover pertaining to an active secondary KAD of the above list, as reported in the initial FY2018 annual CIT return, exceeds the turnover of the active primary KAD as of 20.03.2020;</li> <li>- whose operation was suspended by virtue of State decision;</li> </ul> </li> <li>- Especially for enterprises engaged in hospital activities (KAD 86.10) the above extension applies for VAT due between 01.04.2020 to 31.05.2020.</li> </ul> |
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- During the suspension period, no interest and surcharges shall apply on VAT due.
- The extension applies on condition that the existing number of employees is retained until completion of the measure; otherwise interest and surcharges shall apply as of the initial assessment date.

Art. 1 of leg act dated 11.03.2020 and Ministerial Decisions A. 1054/2020, A. 1063/2020, A.1073/2020 A. 1084/2020 and Art. 5 of leg act dated 01.05.2020. Business Activity Codes (KAD) list is dynamic and thus has been revised on 01.05.2020 (please refer to “business activity codes” section).

## 2. Extension of payment of assessed debts and instalments of arrangements/settlement schemes 01.05.2020

- Payment of assessed debts and instalments based on arrangements/settlement schemes due between 11.03.2020 to 30.04.2020 is extended until 31.08.2020.
- This concerns the affected enterprises, employees of affected enterprises, as well as individuals-lessors of real estate property to affected enterprises.
- Especially for enterprises engaged in hospital activities (KAD 86.10) the above extension applies for amounts due between 01.04.2020 to 31.05.2020.
- An extension of payment deadline of instalments of settled debts for a period up to 6 months shall also apply for gambling companies whose operation has been suspended by virtue of ministerial decision.
- During the suspension period, no interest and surcharges shall apply on taxes due.
- The extension applies on condition that the existing number of employees is retained until completion of the measure; otherwise interest and surcharges shall apply as of the initial assessment date.

Art. 2 of leg act dated 11.03.2020 and Ministerial Decisions A. 1053/2020, A.1061/2020, A. 1062/2020, A. 1072/2020, A.1074/2020, A. 1075/2020, A.1083/2020, A.1085/2020,A. 1086/2020 and Art. 5 and 8 of leg act dated 01.05.2020. Business Activity Codes (KAD) list is dynamic and thus has been revised on 01.05.2020 (please refer to “business activity codes” section).

## 3. Discount in case of timely payment of taxes 01.05.2020

### 25% discount on assessed debts and instalment of settlement schemes

- A 25% discount will be provided where the applicable suspension period is not utilised by the affected enterprises and relevant taxes are timely paid.
- Based on guidelines, 75% of the above taxes must be timely paid so that the 25% discount applies.
- Above discount concerns payment of instalments of assessed debts and instalments of settlement schemes due within 30 March to 30 April 2020 to be performed as of 30 March 2020 onwards.
- For above debts paid from 11 March to 29 March 2020 the 25% discount shall be set-off with subsequent assessed debts due in June onwards.
- VAT and withholding taxes not subject to settlement or payment facilitation schemes are excluded from the above discount.

### Set-off of 25% of April VAT with subsequent assessed debts

- 25% of VAT due in April to be paid in time (until 30.04.20) shall be set-off with subsequent assessed debts of affected enterprises due in May onwards.
- In case of VAT payment in two instalments, both instalments must be paid until 30.04.20.

- The above applies provided that VAT due in March had also been settled; exception to this requirement may apply in special cases.
- Especially for enterprises engaged in hospital activities (KAD 86.10) the above applies provided that VAT amounts due are settled until 11.05.2020.
- Set-off shall be made either based on application of the taxpayer through e-mail or automatically through TAXISNET.

Art. 1 of leg act dated 30.03.2020, Circular E.2046/2020, Ministerial Decisions A. 1068/2020 and A.1079/2020, press release of the Ministry of Finance dated 31.03.2020, Art. 3 of leg act dated 13.04.2020, Circular E.2056/2020 and Art. 2 and 5 of leg act dated 01.05.2020.

#### 4. Submission deadlines of tax returns [applicable to all Greek taxpayers] 16.04.2020

- To date, no general extension to the submission deadlines of periodical tax returns due by the end of April 2020 has been provided (e.g. March VAT and withholding tax returns must be submitted within the applicable deadlines).
- Submission deadline of specific types of tax returns has been extended as follows:
  - Submission of capital accumulation tax and stamp tax returns due within March until April is extended for 2 months.
  - Submission of environmental duty on plastic bags for Q1 2020 due by 30.04.2020 is extended until 30.06.2020.
  - Submission of residence tax returns referring to February and March data, due by 31.03.2020 and 30.04.2020, is extended until 29.05.2020 and 30.06.2020, respectively.
  - Submission of inheritance tax, gambling profits, parental grants and donations tax returns due within March and April is extended until 29.05.2020.
- Filing deadline of annual list of customers-suppliers for 2019 has been extended until 30 June 2020 and correction of respective suppliers' deviations until 31 July 2020.
- Submission of lease agreements notifications through TAXISNET platform for lease contracts or amendments for the period from 01.02.2020 until 30.04.2020, as well as declarations of short-term accommodation for commencement of accommodation or cancellations thereof for the period from 1.02.2020 until 31.05.2020, is extended until 30 June 2020.
- Submission deadline of Q1 2020 list of agreements has been extended until 20.07.2020.

Ministerial Decisions A. 1051/2020, A.1052/2020, A. 1064/2020 and A.1092/2020.

#### 5. Reduction of the VAT rate from 24% to 6% on products necessary for the protection from the coronavirus and its containment 24.03.2020

The VAT rate is reduced to 6% for the following products:

- (a) masks and gloves for medical and private use;
- (b) antiseptic solutions, antiseptic wipes and other antiseptic preparations;
- (c) soap and other preparations for personal hygiene;
- (d) ethyl alcohol designated to be used as raw material for the production of antiseptics; and
- (e) pure ethyl alcohol non-denatured of agricultural origin with 95% alcohol volume available in bottled form in the retail market.

The reduced VAT rate on the above products will apply until 31 December 2020.

Art. 1 of the leg act dated 20.03.2020 and Circular E. 2038/2020.

## 6. Acceleration of tax refunds of amounts not exceeding €30,000 by the tax authorities

10.04.2020

- Immediate refund of amounts not exceeding EUR 30,000 pertaining to pending income tax audit cases for legal persons and legal entities or pending VAT audit cases for natural or legal persons and legal entities, subject to limitation period framework.
- Pending cases are considered those for which no temporary tax assessment act has been issued as of the publication date of the leg act (20 March 2020).
- For the purposes of such refunds, sample audits may be performed as per the Code of Fiscal Procedures provisions.

Art. 3 of the leg act dated 20.03.2020, Circular E. 2037/2020 and document O DEL A 1043783 EX 2020.

## 7. Computation of 2020 annual property tax (ENFIA) based on current objective values

18.03.2020

Postponement of the revision of the real estate property objective values for property tax purposes. The 2020 annual property tax (ENFIA) will be computed on the current objective values whereas the revised ones will be taken into account for the 2021 ENFIA.

Announcement of the Ministry of Finance regarding the second set of measures to address the economic impact of Covid-19.

## 8. Tax audits and administrative appeals

31.03.2020

### Regulations for tax audits:

- The deadline for the tax authorities to serve to the taxpayer preliminary or final tax assessment acts is suspended until 30.04.2020.
- The deadline for the taxpayers to submit their views on preliminary tax assessment acts they have already been served with is suspended until 31.05.2020.
- The imposition of safeguard measures by the tax authorities is suspended for as long the operation of the courts is also suspended.
- The obligation of taxpayers to respond to requests of the tax authorities for submission of data and information concerning their tax compliance is suspended until 31.05.2020.

### Regulations for administrative appeals:

- The deadline for filing administrative appeals, which has expired or will expire in the period between 11.03.2020 and 31.05.2020 is suspended for sixty days.
- The deadline for the Dispute Resolution Directorate to issue decisions on administrative appeals, which was due to expire in the period between 20.03.2020 and 31.05.2020, is extended for sixty days.

Art. 6 of leg act dated 30.03.2020.

## 9. Procedural tax issues

13.04.2020

- Tax refund applications along with scanned copies of relevant supporting material shall be sent electronically through e-mail to the tax authorities during the covid-19 outbreak period.
- The remote issuance of tax authenticator key ("kleidarithmos") is introduced through SMS and e-mail of the taxpayer instead of physical presence at the competent tax office.
- A correction procedure of the declared KAD has been introduced so that affected enterprises that have not declared the proper KAD with the tax authorities can benefit from the applicable measures. Correction of KAD shall be made until 24.04.2020 provided that the KAD to be declared was

already a secondary KAD and it corresponds to the higher part of the 2019 turnover of the enterprise.

Ministerial Decision A.1082/2020, press release of the Ministry of Finance dated 10.04.2020 and 12.04.2020, Art. 2 of leg act dated 13.04.2020, Circular E.2048/2020 and document O DEL A 1043783 EX 2020.

## 12. Social Security

- 1. Payment of social security contributions and instalments of arrangements/settlement schemes**  
01.05.2020
- Payment of February and March social security contributions is extended until 30.09.2020 and 31.10.2020, respectively.
  - A 3-month extension is also provided for the payment of instalments of active settlement schemes due by 31.03.2020 and for subsequent monthly instalments.
  - The above measure concerns the affected enterprises included in the list of eligible KAD of March.
  - Especially for enterprises engaged in hospital activities (KAD 86.10) payment extension applies for March and April social contributions until 31.10.2020 and 30.11.2020, respectively. A 3-month extension also applies for payment of active settlement schemes instalments due by 30.04.2020 and subsequent monthly instalments for these enterprises.
  - During the suspension period, no interest and surcharges shall apply on social security contributions due.
  - The extension applies on condition that the existing number of employees is retained until completion of the measure; otherwise interest and surcharges shall apply as of the initial assessment date.

Art.3 of leg act dated 11.03.2020, Ministerial Decisions D.15/D'/oik.13226/325/2020 and D.15/D'/oik.13937/337/2020, document 23221/2020, press release of the Ministry of Finance dated 31.03.2020, EFKA Circular 12/2020 and Art. 5 of leg act dated 01.05.2020.

- 2. Discount of duly payment of social security contributions**  
14.04.2020
- A 25% discount is provided in case that suspension period is not utilised and February and March social security contributions are timely paid.
  - Measure shall apply to certain categories of freelancers, self-employed persons and individual business owners.

Art. 18 of leg act dated 30.03.2020, Decision D.15/D'/oik.13994/339/2020 and EFKA Circular 15/2020.

- 3. Extension of social security contributions return submission**  
06.05.2020
- An extension to the filing of the social security contributions return (APD) of March is provided until 15 May 2020.
  - The above regards all taxpayers and not only affected enterprises.

Press release of the Ministry of Labor dated 27.04.2020 and EFKA doc. AP.: 82992 dated 06.05.2020.

## 13. Customs

- 1. Guidelines for imports/exports**  
29.03.2020
- Submission of customs declarations and relevant supporting documents is made electronically through Greek Customs electronic system (ICISnet).
  - Entry of the public and customs brokers at the customs offices is restricted and all respective operations are performed remotely through ICISnet. Physical presence at the customs office is only required in case of physical audit of goods.
  - Contact details of the competent officers for each transaction are notified to interested parties through both IAPR website ([www.aade.gr](http://www.aade.gr)) and announcement outside the customs office premises.
  - In case of imports, the authorisation to receive the goods upon customs clearance is sent via e-mail to the competent person. Customs representatives and warehousekeepers are under the obligation to notify their e-mail addresses to the competent customs office.
  - In case of exports, the export accompanying document shall be replaced by a printout of the electronic message for the completion of the export (message "IE 599"), which accompanies the goods until they reach the customs office of exit (in case the customs office is in Greece).

Circular E.2033/2020 of the Ministry of Finance published on 20.03.2020.

- 2. Import of denatured ethyl alcohol**  
26.03.2020
- Import of denatured ethyl alcohol intended exclusively for the production of antiseptic products and their distribution in the Greek market is allowed, under conditions, following a relevant decision of the Minister of Development and Investments.
  - The relevant imports shall be allowed for as long as there is a risk for spreading of Covid-19 and in any event no later than 20 July, 2020.

Art. 3 of the leg act dated 20.03.2020 and Circular E. 2039/2020.

- 3. EU customs related developments**  
31.03.2020
- Export authorisation for protective equipment:**
- EU Commission has adopted a new Regulation (affecting all EU member states) providing for an export authorisation in case of export of personal protective equipment for the prevention of virus spreading.
  - Exports to specific countries specifically enumerated in the new Regulation are excluded from the above requirement.
  - Relevant measure shall apply for a period of six weeks, starting from the publication of the above Regulation (i.e. from 15.03.2020).
  - Equipment subject to the above consists in protective spectacles and visors, face shields, mouth-nose-protection equipment and gloves.
- EU Commission practical guidance:**
- EU Commission has published (non-binding) guidance on customs issues relating to covid-19 emergency, indicating practical solutions to concerned stakeholders.
  - Guidance covers, among others, issues relating to customs representation, decisions, guarantees submitted to customs authorities, declaration and presentation of non-EU goods to customs.
  - It also includes implementation guidelines for the application of customs procedures such as temporary storage, transit, temporary admission and export.

**4. Relief from customs duties and VAT on specific products**  
03.04.2020

- Relief from customs duties and VAT is provided under conditions, for the import of goods distributed or made available free of charge to persons:
  - affected by or at risk of Covid-19, or
  - involved in combatting the Covid-19 outbreak.
- Said goods must be imported by or on behalf of State organisations or other organisations approved by local competent authorities.
- The relief also applies to disaster relief agencies for goods imported for the purposes of providing disaster relief to persons as per the above.
- Above measure shall apply to imports made between 30.01.2020 and 31.07.2020.

Commission Decision C(2020) 2146 dated 03.04.20.

**5. Prohibition of export of disinfectant products**  
06.04.2020

- The export of disinfectant products (in the form of wet wipes, liquid or gel) for human use is prohibited for the prevention of Covid-19 outbreak.
- The above applies for a period not exceeding 6 months, starting from 27 March 2020.
- The above products will be exclusively made available to the Greek market.

Article 5 of law 4681/2020 and circular DTD C 1042277 EX 2020.

**6. Relief from customs duties and VAT on imported goods for combatting Covid-19 outbreak**  
08.04.2020

Implementation guidelines of a recent EU Commission Decision on the relief from customs duties and VAT for goods imported for combatting Covid-19 outbreak have been issued. In particular:

- An indicative list of the eligible for relief goods is provided.
- Persons entitled to the relief are legal bodies and organisations of the public sector, including church organisations, as well as legal bodies and not-for-profit organisations supervised by the above public bodies.
- Other legal entities or private individuals can also benefit from the above relief provided that they will donate the imported goods to the above persons and follow a specific procedure.
- Customs declarations to be submitted upon import of the above goods must include special reference codes, indicating the above relief.

Circular E.2045/2020.

**7. Guidelines regarding customs decisions' issuance**  
09.04.2020

- Businesses are advised to postpone non-urgent requests for the issuance of customs decisions. Accordingly, customs decisions are prioritised, taking into account the need to mitigate the negative consequences of Covid-19.
- The deadline for customs decisions issuance can be postponed up to 30 days [or 60 days for Authorised Economic Operator (AEO) authorisations]. Businesses can also request postponement of customs decisions in order to carry out adjustments ensuring the fulfillment of conditions and criteria.
- The audit of AEO authorisations and free zones shall be made remotely to the extent possible during the Covid-19 outbreak.
- Temporary licences for temporary storage and customs warehouses can be issued through electronic submission of relevant applications and supporting documents during the Covid-19 outbreak.

Circular E.2047/2020.

**8. Practical instructions for Covid-19 emergency measures**  
16.04.2020

Greek customs authorities have issued further guidelines and practical instructions relating to Covid-19 emergency based on the guidance already provided by EU Commission. In particular:

- T2L documents (evidencing goods' EU status) can be replaced by scanned copies of invoices or transport documents.
- In case of movement of goods through transit, carriers are advised to use specific internal border-crossing points ("green lanes") operating 24 hours a day and carry out only minimal and strictly necessary checks over goods and documents.
- Goods cannot remain in temporary storage for more than 90 days, but businesses may benefit from other schemes allowing the suspension of duties and taxes, such as customs warehousing, free zones, etc.
- Customs export declarations should not be invalidated after 150 days in cases where the customs export office has not received any information or evidence that the goods have left the EU customs territory (unless the invalidation is requested by the exporter).

Circular E.2050/2020.

**9. Guidelines regarding proof of preferential origin**  
23.04.2020

- In case of exports, customs authorities can send electronically copies of certificates of origin to exporters and exporters shall submit electronically relevant supporting documents.
- Covid-19 crisis can be considered as exceptional circumstances, justifying the issuance of said certificates following goods export. Above measures also apply to A.TR certificates for goods exported to Turkey.
- As regards imports, certificates of preferential origin can be submitted electronically to customs authorities while relevant original documents must be available within 60 days as of customs declaration filing. Such deadline can be extended due to Covid-19 crisis.
- As of 24.04.2020, A.TR, EUR.1 and EUR-MED certificates are issued only electronically by the Turkish authorities. Importers of goods accompanied by the above certificates will not be required to obtain the originals following relevant import. Authenticity of the above certificates will be checked through the relevant QR code or web address.

Circulars E.2053/2020 and 2057/2020.

**10. Postponement of payment of excise duty and VAT for spirits and alcoholic products**  
25.04.2020

- Payment of excise duty, VAT and other charges related to spirits and alcoholic products released for consumption during March 2020 is postponed until 25 June 2020.
- Payment of the above duties and taxes for spirits and alcoholic products released for consumption during April 2020 is postponed until 25 July 2020.

Article 6 of law 4684/2020 and Circular E. 2058/2020.

**11. Suspension of payment of excise duty, VAT and other charges for petroleum products**  
01.05.2020

- A 10-day suspension of payment of excise duty, VAT and other charges is provided to authorised warehouse keepers of petroleum products for products removed from tax warehouses between 4 and 19 May 2020.
- Above 10-day suspension commences from the date the products exit the tax warehouse and are released for consumption and applies provided that the corresponding duties and taxes are covered by a financial guarantee.

Art 4 of leg act dated 01.05.2020 and circular Ο ΔΕΦΚΦ Α 1049144 ΕΞ 2020.

**12. Time extension for supplies of heating oil at a reduced rate**  
01.05.2020

- Exclusively for 2020, the time period for the supply of heating oil at the reduced rate of €280/1,000 liters (instead of €410/1,000 liters), which normally runs between 15 October and 30 April of each year, is extended until 15 May 2020.
- The above period can be further extended up to 31 December 2020, through a relevant decision of the Minister of Finance.

Art. 7 of leg act dated 01.05.2020 and circular Ο ΔΕΦΚΦ Α 1049144 ΕΞ 2020.

## Business Activity Codes (in Greek: KAD) applying to sectors affected by the spread of the new coronavirus

Private businesses subject to one of the Business Activity Codes (KAD) listed below (either as primary or secondary KAD whose turnover as per the FY2018 annual CIT return exceeds the turnover of the primary KAD) shall be eligible for the support measures.

The updated list of Business Activity Codes (in Greek: KAD) applying to sectors affected by the spread of the new coronavirus is shown below: When a 4-digit code applies, it shall include all the 5-, 6- and 8-digit subcategories under it. When a 5-digit code applies, it shall include all the 6- and 8-digit subcategories under it. When a 6-digit code applies, it shall include all 8-digit subcategories under it.

01.19.2	Cut flowers and flower buds; flower seeds	10.39	Other processing and preserving of fruit and vegetables
01.29	Growing of other perennial crops	10.41	Manufacture of oils and fats
01.30	Plant propagation	10.42	Manufacture of margarine and similar edible fats
01.49.19.02	Fur farming (fox, mink, coyopus, chinchillas, and others)	10.51	Operation of dairies and cheese making
01.49.3	Raw fur skins and miscellaneous raw hides and skins	10.52	Manufacture of ice cream
01.63.10.12	Cotton ginning services (post harvest sale for own account)	10.61	Manufacture of grain mill products
01.63.10.13	Cotton ginning services (post harvest sale for third-party account)	10.62	Manufacture of starches and starch products
02.10	Silviculture and other forestry activities	10.71	Manufacture of bread; manufacture of fresh pastry goods and cakes
02.20	Logging	10.72	Manufacture of rusks and biscuits; manufacture of preserved pastry goods and cakes
02.30	Gathering of wild growing non-wood products	10.73	Manufacture of macaroni, noodles, couscous and similar farinaceous products
02.40	Support services to forestry	10.81	Manufacture of sugar
03.11	Marine fishing	10.82	Manufacture of cocoa, chocolate and sugar confectionery
03.12	Freshwater fishing	10.83	Processing of tea and coffee
03.21	Marine aquaculture	10.84	Manufacture of condiments and seasonings
03.22	Freshwater aquaculture	10.85	Manufacture of prepared meals and dishes
05.10	Mining of hard coal	10.86	Manufacture of homogenised food preparations and dietetic food
05.20	Mining of lignite	10.89	Manufacture of other food products n.e.c.
07.10	Mining of iron ores	10.91	Manufacture of prepared feeds for farm animals
07.29	Mining of other non-ferrous metal ores	10.92	Manufacture of prepared pet foods
08.11	Quarrying of ornamental and building stone, limestone, gypsum, chalk and slate	11.01	Distilling, rectifying and blending of spirits
08.12	Operation of gravel and sand pits; mining of clays and kaolin	11.02	Manufacture of wine from grape
08.91	Mining of chemical and fertiliser minerals	11.03	Manufacture of cider and other fruit wines
08.92	Extraction of peat	11.04	Manufacture of other non-distilled fermented beverages
08.93	Extraction of salt	11.05	Manufacture of beer
08.99	Other mining and quarrying n.e.c.	11.06	Manufacture of malt
09.10	Support activities for petroleum and natural gas extraction	11.07	Manufacture of soft drinks; production of mineral waters and other bottled waters
09.90	Support activities for other mining and quarrying	13.10	Preparation and spinning of textile fibres
10.11	Processing and preserving of meat	13.20	Weaving of textiles
10.12	Processing and preserving of poultry meat	13.30	Finishing of textiles
10.13	Production of meat and poultry meat products	13.91	Manufacture of knitted and crocheted fabrics
10.20	Processing and preserving of fish, crustaceans and molluscs		
10.31	Processing and preserving of potatoes		
10.32	Manufacture of fruit and vegetable juice		

13.92	Manufacture of made-up textile articles, except apparel	18.20	Reproduction of recorded media
13.93	Manufacture of carpets and rugs	19.10	Manufacture of coke oven products
13.94	Manufacture of cordage, rope, twine and netting	20.11	Manufacture of industrial gases
13.95	Manufacture of non-wovens and articles made from non-wovens, except apparel	20.12	Manufacture of dyes and pigments
13.96	Manufacture of other technical and industrial textiles	20.13	Manufacture of other inorganic basic chemicals
13.99	Manufacture of other textiles n.e.c.	20.14	Manufacture of other organic basic chemicals
14.11	Manufacture of leather clothes	20.15	Manufacture of fertilisers and nitrogen compounds
14.12	Manufacture of workwear	20.16	Manufacture of plastics in primary forms
14.13	Manufacture of other outerwear	20.17	Manufacture of synthetic rubber in primary forms
14.14	Manufacture of underwear	20.20	Manufacture of pesticides and other agrochemical products
14.19	Manufacture of other wearing apparel and accessories	20.30	Manufacture of paints, varnishes and similar coatings, printing ink and mastics
14.20	Manufacture of articles of fur	20.41	Manufacture of soap and detergents, cleaning and polishing preparations
14.31	Manufacture of knitted and crocheted hosiery	20.42	Manufacture of perfumes and toilet preparations
14.39	Manufacture of other knitted and crocheted apparel	20.51	Manufacture of explosives
15.11	Tanning and dressing of leather; dressing and dyeing of fur	20.52	Manufacture of glues
15.12	Manufacture of luggage, handbags and the like, saddlery and harness	20.53	Manufacture of essential oils
15.20	Manufacture of footwear	20.59	Manufacture of other chemical products n.e.c.
16.10	Sawmilling and planing of wood	20.60	Manufacture of man-made fibres
16.21	Manufacture of veneer sheets and wood-based panels	22.11	Manufacture of rubber tyres and tubes; retreading and rebuilding of rubber tyres
16.22	Manufacture of assembled parquet floors	22.19	Manufacture of other rubber products
16.23	Manufacture of other builders' carpentry and joinery	22.21	Manufacture of plastic plates, sheets, tubes and profiles
16.24	Manufacture of wooden containers	22.22	Manufacture of plastic packing goods
16.29	Manufacture of other products of wood; manufacture of articles of cork, straw and plaiting materials	22.23	Manufacture of builders' ware of plastic
17.11	Manufacture of pulp	22.29	Manufacture of other plastic products
17.12	Manufacture of paper and paperboard	23.11	Manufacture of flat glass
17.21	Manufacture of corrugated paper and paperboard and of containers of paper and paperboard	23.12	Shaping and processing of flat glass
17.22	Manufacture of household and sanitary goods and of toilet requisites	23.13	Manufacture of hollow glass
17.23	Manufacture of paper stationery	23.14	Manufacture of glass fibres
17.24	Manufacture of wallpaper	23.19	Manufacture and processing of other glass, including technical glassware
17.29	Manufacture of other articles of paper and paperboard	23.20	Manufacture of refractory products
18.11	Printing of newspapers	23.31	Manufacture of ceramic tiles and flags
18.12	Other printing	23.32	Manufacture of bricks, tiles and construction products, in baked clay
18.13	Pre-press and pre-media services	23.41	Manufacture of ceramic household and ornamental articles
18.14	Binding and related services	23.42	Manufacture of ceramic sanitary fixtures
		23.43	Manufacture of ceramic insulators and insulating fittings
		23.44	Manufacture of other technical ceramic products

23.49	Manufacture of other ceramic products	25.73	Manufacture of tools
23.51	Manufacture of cement	25.91	Manufacture of steel drums and similar containers
23.52	Manufacture of lime and plaster	25.92	Manufacture of light metal packaging
23.61	Manufacture of concrete products for construction purposes	25.93	Manufacture of wire products, chain and springs
23.62	Manufacture of plaster products for construction purposes	25.94	Manufacture of fasteners and screw machine products
23.63	Manufacture of ready-mixed concrete	25.99	Manufacture of other fabricated metal products n.e.c.
23.64	Manufacture of mortars	26.11	Manufacture of electronic components
23.65	Manufacture of fibre cement	26.12	Manufacture of loaded electronic boards
23.69	Manufacture of other articles of concrete, plaster and cement	26.20	Manufacture of computers and peripheral equipment
23.70	Cutting, shaping and finishing of stone	26.30	Manufacture of communication equipment
23.91	Production of abrasive products	26.40	Manufacture of consumer electronics
23.99	Manufacture of other non-metallic mineral products n.e.c.	26.51	Manufacture of instruments and appliances for measuring, testing and navigation
24.10	Manufacture of basic iron and steel and of ferro-alloys	26.52	Manufacture of watches and clocks
24.20	Manufacture of tubes, pipes, hollow profiles and related fittings, of steel	26.60	Manufacture of irradiation, electromedical and electrotherapeutic equipment
24.31	Cold drawing of bars	26.70	Manufacture of optical instruments and photographic equipment
24.32	Cold rolling of narrow strip	26.80	Manufacture of magnetic and optical media
24.33	Cold forming or folding	27.11	Manufacture of electric motors, generators and transformers
24.34	Cold drawing of wire	27.12	Manufacture of electricity distribution and control apparatus
24.41	Precious metals production	27.20	Manufacture of batteries and accumulators
24.42	Aluminium production	27.31	Manufacture of fibre optic cables
24.43	Lead, zinc and tin production	27.32	Manufacture of other electronic and electric wires and cables
24.44	Copper production	27.33	Manufacture of wiring devices
24.45	Other non-ferrous metal production	27.40	Manufacture of electric lighting equipment
24.46	Processing of nuclear fuel	27.51	Manufacture of electric domestic appliances
24.51	Casting of iron	27.52	Manufacture of non-electric domestic appliances
24.52	Casting of steel	27.90	Manufacture of other electrical equipment
24.53	Casting of light metals	28.11	Manufacture of engines and turbines, except aircraft, vehicle and cycle engines
24.54	Casting of other non-ferrous metals	28.12	Manufacture of fluid power equipment
25.11	Manufacture of metal structures and parts of structures	28.13	Manufacture of other pumps and compressors
25.12	Manufacture of doors and windows of metal	28.14	Manufacture of other taps and valves
25.21	Manufacture of central heating radiators and boilers	28.15	Manufacture of bearings, gears, gearing and driving elements
25.29	Manufacture of other tanks, reservoirs and containers of metal	28.21	Manufacture of ovens, furnaces and furnace burners
25.30	Manufacture of steam generators, except central heating hot water boilers	28.22	Manufacture of lifting and handling equipment
25.50	Forging, pressing, stamping and roll-forming of metal; powder metallurgy		
25.61	Treatment and coating of metals		
25.62	Machining		
25.71	Manufacture of cutlery		
25.72	Manufacture of locks and hinges		

28.23	Manufacture of office machinery and equipment (except computers and peripheral equipment)	32.30	Manufacture of sports goods
28.24	Manufacture of power-driven hand tools	32.40	Manufacture of games and toys
28.25	Manufacture of non-domestic cooling and ventilation equipment	32.50	Manufacture of medical and dental instruments and supplies
28.29	Manufacture of other general-purpose machinery n.e.c.	32.91	Manufacture of brooms and brushes
28.30	Manufacture of agricultural and forestry machinery	32.99	Other manufacturing n.e.c
28.41	Manufacture of metal forming machinery	33.11	Repair of fabricated metal products
28.49	Manufacture of other machine tools	33.12	Repair of machinery
28.91	Manufacture of machinery for metallurgy	33.13	Repair of electronic and optical equipment
28.92	Manufacture of machinery for mining, quarrying and construction	33.14	Repair of electrical equipment
28.93	Manufacture of machinery for food, beverage and tobacco processing	33.15	Repair and maintenance of ships and boats
28.94	Manufacture of machinery for textile, apparel and leather production	33.16	Repair and maintenance of aircraft and spacecraft
28.95	Manufacture of machinery for paper and paperboard production	33.17	Repair and maintenance of other transport equipment
28.96	Manufacture of plastic and rubber machinery	33.19	Repair of other equipment
28.99	Manufacture of other special-purpose machinery n.e.c.	33.20	Installation of industrial machinery and equipment
29.10	Manufacture of motor vehicles	35.30	Steam and air conditioning supply
29.20	Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi-trailers	41.10	Development of building projects
29.31	Manufacture of electrical and electronic equipment for motor vehicles	41.20	Construction of residential and non-residential buildings
29.32	Manufacture of other parts and accessories for motor vehicles	42.99	Construction of other civil engineering projects n.e.c.
30.11	Building of ships and floating structures	43.11	Demolition
30.12	Building of pleasure and sporting boats	43.12	Site preparation
30.20	Manufacture of railway locomotives and rolling stock	43.13	Test drilling and boring
30.30	Manufacture of air and spacecraft and related machinery	43.21	Electrical installation
30.91	Manufacture of motorcycles	43.22	Plumbing, heat and air conditioning installation
30.92	Manufacture of bicycles and invalid carriages	43.29	Other construction installation
30.99	Manufacture of other transport equipment n.e.c	43.31	Plastering
31.01	Manufacture of office and shop furniture	43.32	Joinery installation
31.02	Manufacture of kitchen furniture	43.33	Floor and wall covering
31.03	Manufacture of mattresses	43.34	Painting and glazing
31.09	Manufacture of other furniture	43.39	Other building completion and finishing
32.11	Striking of coins	43.91	Roofing activities
32.12	Manufacture of jewellery and related articles	43.99	Other specialised construction activities n.e.c.
32.13	Manufacture of imitation jewellery and related articles	45.11	Sale of cars and light motor vehicles
32.20	Manufacture of musical instruments	45.19	Sale of other motor vehicles
		45.20	Maintenance and repair of motor vehicles
		45.31	Wholesale trade of motor vehicle parts and accessories
		45.32	Retail trade of motor vehicle parts and accessories in specialised stores
		45.40	Sale, maintenance and repair of motorcycles and related parts and accessories
		46.11	Agents involved in the sale of agricultural raw materials, live animals, textile raw materials and semi-finished goods

46.12	Agents involved in the sale of fuels, ores, metals and industrial chemicals, except Agents involved in the sale of solid, liquid and gaseous fuels and related products (46.12.11)	46.49	Wholesale of other household goods
46.13	Agents involved in the sale of timber and building materials	46.51	Wholesale of computers, computer peripheral equipment and software
46.14	Agents involved in the sale of machinery, industrial equipment, ships and aircraft	46.52	Wholesale of electronic and telecommunications equipment and parts
46.15	Agents involved in the sale of furniture, household goods, hardware and ironmongery	46.61	Wholesale of agricultural machinery, equipment and supplies
46.16	Agents involved in the sale of textiles, clothing, fur, footwear and leather good	46.62	Wholesale of machine tools
46.17	Agents involved in the sale of food, beverages and tobacco	46.63	Wholesale of mining, construction and civil engineering machinery
46.18.11.01	Agents involved in the sale of irradiation, electromedical and electrotherapeutic equipment	46.64	Wholesale of machinery for the textile industry and of sewing and knitting machines
46.18.11.02	Agents involved in the sale of perfumes and toilet preparations	46.65	Wholesale of office furniture
46.18.11.06	Agents involved in the sale of medical and dental instruments, machines and tools	46.66	Wholesale of other office machinery and equipment
46.19	Agents involved in the sale of a variety of goods	46.69	Wholesale of other machinery and equipment
46.21	Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	46.72	Wholesale of metals and metal ores
46.22	Wholesale of flowers and plants	46.73	Wholesale of wood, construction materials and sanitary equipment
46.23	Wholesale of live animals	46.74	Wholesale of hardware, plumbing and heating equipment and supplies
46.24	Wholesale of hides, skins and leather	46.75	Wholesale of chemical products
46.31	Wholesale of fruit and vegetables	46.76	Wholesale of other intermediate products
46.32	Wholesale of meat and meat products	46.77	Wholesale of waste and scrap
46.33	Wholesale of dairy products, eggs and edible oils and fats	46.90	Non-specialised wholesale trade
46.34	Wholesale of beverages	47.19	Other retail sale in non-specialised stores excluding haberdashery (47.19.10.01) and kiosks (47.19.10.02)
46.36	Wholesale of sugar and chocolate and sugar confectionery	47.23	Retail sale of fish, crustaceans and molluscs in specialised stores
46.37	Wholesale of coffee, tea, cocoa and spices	47.24	Retail sale of bread, cakes, flour confectionery and sugar confectionery in specialised stores
46.38	Wholesale of other food, including fish, crustaceans and molluscs	47.25	Retail sale of beverages in specialised stores
46.39	Non-specialised wholesale of food, beverages and tobacco	47.29	Other retail sale of food in specialised stores
46.41	Wholesale of textiles	47.41	Retail sale of computers, peripheral units and software in specialised stores
46.42	Wholesale of clothing and footwear	47.42	Retail sale of telecommunications equipment in specialised stores
46.43	Wholesale of electrical household appliances	47.43	Retail sale of audio and video equipment in specialised stores
46.44	Wholesale of china and glassware and cleaning materials	47.51	Retail sale of textiles in specialised stores
46.45	Wholesale of perfume and cosmetics	47.52	Retail sale of hardware, paints and glass in specialised stores
46.47	Wholesale of furniture, carpets and lighting equipment	47.53	Retail sale of carpets, rugs, wall and floor coverings in specialised stores
46.48	Wholesale of watches and jewellery	47.54	Retail sale of electrical household appliances in specialised stores

47.59	Retail sale of furniture, lighting equipment and other household articles in specialised stores	52.10	Warehousing and storage
47.61	Retail sale of books in specialised stores	52.21	Service activities incidental to land transportation
47.62	Retail sale of newspapers and stationery in specialised stores	52.22	Service activities incidental to water transportation
47.63	Retail sale of music and video recordings in specialised stores	52.23	Service activities incidental to air transportation
47.64	Retail sale of sporting equipment in specialised stores	52.24	Cargo handling
47.65	Retail sale of games and toys in specialised stores	52.29	Other transportation support activities
47.71	Retail sale of clothing in specialised stores	55.10	Hotels and similar accommodation
47.72	Retail sale of footwear and leather goods in specialised stores	55.20	Holiday and other short-stay accommodation
47.74	Retail sale of medical and orthopaedic goods in specialised stores	55.30	Camping grounds, recreational vehicle parks and trailer parks
47.75	Retail sale of cosmetic and toilet articles in specialised stores	55.90	Other accommodation
47.76	Retail sale of flowers, plants, seeds, fertilisers, pet animals and pet food in specialised stores	56.10	Restaurants and mobile food service activities
47.77	Retail sale of watches and jewellery in specialised stores	56.21	Event catering activities
47.78	Other retail sale of new goods in specialised stores, except Retail sale of household fuel oil, LPG, coal and wood (47.78.85)	56.29	Other food service activities, excluding: food services provided by military mess halls (56.29.20.01)
47.79	Retail sale of second-hand goods in stores	56.30	Beverage serving activities
47.81	Retail sale via stalls and markets of food, beverages and tobacco products	58.11	Book publishing
47.82	Retail sale via stalls and markets of textiles, clothing and footwear	58.12	Publishing of directories and mailing lists
47.89	Retail sale via stalls and markets of other goods	58.13	Publishing of newspapers
47.99	Other retail sale not in stores, stalls or markets	58.14	Publishing of printed journals and periodicals
49.10	Passenger rail transport, interurban	58.19	Other publishing activities
49.20	Freight rail transport	58.21	Publishing of computer games
49.31	Urban and suburban passenger land transport	58.29	Other software publishing
49.32	Taxi operation	59.11	Motion picture, video and television programme production activities
49.39	Other passenger land transport n.e.c.	59.12	Motion picture, video and television programme post-production activities
49.41	Freight transport by road	59.13	Motion picture, video and television programme distribution activities
49.42	Removal services	59.14	Motion picture projection activities
50.10	Sea and coastal passenger water transport	59.20	Sound recording and music publishing activities
50.20	Sea and coastal freight water transport	60.10	Radio broadcasting
50.30	Inland passenger water transport	60.20	Television programming and broadcasting activities
50.40	Inland freight water transport	61.90	Other telecommunications activities
51.10	Passenger air transport	62.01	Computer programming activities
51.21	Freight air transport	62.02	Computer consultancy activities
		62.03	Computer facilities management activities
		62.09	Other information technology and computer service activities
		63.11	Data processing, hosting and related activities
		63.12	Web portals
		63.91	News agency activities
		63.99	Other information service activities n.e.c.
		64.20	Activities of holding companies

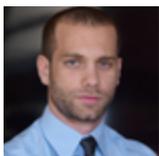
64.30	Trusts, funds and similar financial entities	77.22	Renting of video tapes and disks
64.91	Financial leasing	77.29	Renting and leasing of other personal and household goods
65.11	Life insurance	77.31	Renting and leasing of agricultural machinery and equipment
65.12	Non-life insurance	77.32	Renting and leasing of construction and civil engineering machinery and equipment
65.20	Reinsurance	77.33	Renting and leasing of office machinery and equipment (including computers)
66.12	Security and commodity contracts brokerage	77.34	Renting and leasing of water transport equipment
66.19	Other activities auxiliary to financial services, except insurance and pension funding	77.35	Renting and leasing of air transport equipment
66.21	Risk and damage evaluation	77.39	Renting and leasing of other machinery, equipment and tangible goods n.e.c.
66.22	Activities of insurance agents and brokers	77.40	Leasing of intellectual property and similar products, except copyrighted works
66.29	Other activities auxiliary to insurance and pension funding	78.10	Activities of employment placement agencies
66.30	Fund management activities	78.20	Temporary employment agency activities
68.10	Buying and selling of own real estate	78.30	Other human resources provision activities
68.20	Renting and operating of own or leased real estate	79.11	Travel agency activities
68.31	Real estate agencies	79.12	Tour operator activities
68.32	Management of real estate on a fee or contract basis	79.90	Other reservation service and related activities
69.10	Legal activities	80.10	Private security activities
69.20	Accounting, bookkeeping and auditing services; tax consulting services	80.20	Security systems service activities
70.10	Activities of head offices	80.30	Investigation activities
70.21	Public relations and communication activities	81.10	Combined facilities support activities (Combined support services to buildings and landscape activities) (cleaning, security, reception services, etc.)
70.22	Business and other management consultancy activities	81.21	General cleaning of buildings
71.11	Architectural activities	81.22	Other building and industrial cleaning activities
71.12	Engineering activities and related technical consultancy	81.29	Other cleaning activities
71.20	Technical testing and analysis	81.30	Landscape service activities
72.11	Research and experimental development on biotechnology	82.11	Combined office administrative service activities
72.19	Other research and experimental development on natural sciences and engineering	82.19	Photocopying, document preparation and other specialised office support activities
72.20	Research and experimental development on social sciences and humanities	82.20	Activities of call centres
73.11	Advertising agencies	82.30	Organisation of conventions and trade shows
73.12	Media representation	82.91	Activities of collection agencies and credit bureaus
73.20	Market research and public opinion polling	82.92	Packaging activities
74.10	Specialised design activities	82.99	Other business support service activities n.e.c.
74.20	Photographic activities	84.12	Regulation of the activities of providing health care, education, cultural services and other social services, excluding social security
74.30	Translation and interpretation activities		
74.90	Other professional, scientific and technical activities n.e.c.		
75.00	Veterinary activities		
77.11	Renting and leasing of cars and light motor vehicles		
77.12	Renting and leasing of trucks		
77.21	Renting and leasing of recreational and sports goods		

84.13	Regulation of and contribution to more efficient operation of business	93.29	Other amusement and recreation activities
84.23	Justice and judicial activities	94.11	Activities of business and employers membership organisations
85.10	Pre-primary education	94.12	Activities of professional membership organisations
85.20	Primary education	94.91	Activities of religious organisations
85.31	General secondary education	94.99	Activities of other membership organisations n.e.c.
85.32	Technical and vocational secondary education	95.11	Repair of computers and peripheral equipment
85.41	Post-secondary non-tertiary education	95.12	Repair of communication equipment
85.42	Tertiary education	95.21	Repair of consumer electronics
85.51	Sports and recreation education	95.22	Repair of household appliances and home and garden equipment
85.52	Cultural education	95.23	Repair of footwear and leather goods
85.53	Driving school activities	95.24	Repair of furniture and home furnishings
85.59	Other education n.e.c.	95.25	Repair of watches, clocks and jewellery
85.60	Educational support activities	95.29	Repair of other personal and household goods
86.10	Hospital Activities	96.01	Washing and (dry-)cleaning of textile and fur products
86.21	General medical practice activities	96.02	Hairdressing and other beauty treatment
86.22	Specialist medical practice activities	96.04	Physical well-being activities
86.23	Dental practice activities	96.09	Other personal service activities n.e.c., except: Domestic worker services (96.09.19.13), Personal chauffeur services (96.09.19.15)
86.90	Other human health activities		Retail stores operating on a shop-in-a-shop basis within outlet stores, malls and outlet malls, with the exception of supermarkets and pharmacies, on condition that they have a separate entrance for consumers.
87.10	Nursing care activities with accommodation		Digital branded content publishers that either are registered with the Online Media Businesses Registry kept with the General Secretariat for Information and Communication at the time of this Press Release, or shall register with the foregoing Online Media Business Registry following approval of their application by the competent General Secretariat for Information and Communication committee.
87.20	Care activities with accommodation for mental retardation, mental disorders and substance abuse		Stores and businesses of any kind operating within hotel units and hotel complexes, and within airports in the Greek territory
87.30	Care activities with accommodation for the elderly and disabled		Stores providing retail telecommunication services, including the renewal of prepaid telecommunication services and the repair and replacement of users' telecommunications equipment.
87.90	Other care activities with accommodation		
88.10	Social work activities without accommodation for the elderly and disabled		
88.91	Child day-care activities		
88.99	Other social work activities without accommodation n.e.c.		
90.01	Performing arts		
90.02	Support activities to performing arts		
90.03	Artistic creation		
90.04	Operation of arts facilities		
91.01	Library and archives activities		
91.02	Museums activities		
91.03	Operation of historical sites and buildings and similar visitor attractions		
91.04	Botanical and zoological gardens and nature reserves activities		
92.00	Gambling and betting services except: On-line gambling services (92.00.14), On-line betting services (92.00.21)		
93.11	Operation of sports facilities		
93.12	Activities of sport clubs		
93.13	Fitness facilities		
93.19	Other sports activities		
93.21	Activities of amusement parks and theme parks		

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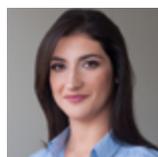
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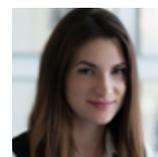
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