

Greece Submits Pillar Two Legislation for Public Consultation, Opts for Three Safe Harbour Rules

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Greece has submitted a draft bill implementing the [European Union Minimum Taxation Directive \(2022/2523\) \(2022\)](#) for public consultation. The consultation runs until 6 March 2024.

The legislative text closely follows the Directive. Therefore, the draft provisions include text on the income inclusion rule (IIR) and the undertaxed profit rule (UTPR).

In addition, Greece has opted for a qualified domestic top-up (QDMTT) tax.

Finally, Greece opted for the CbCR Transitional Safe Harbour Rule, a UTPR Transitional Safe Harbour Rule and the QDMTT Safe Harbour Rule.

IIR will apply for financial years beginning on 31 December 2023. UTPR will apply for financial years beginning on 31 December 2024 unless the ultimate parent company of the MNE is established in an EU Member State that has delayed IIR and UTPR, in which case the Greek UTPR will apply for financial years beginning on 31 December 2023. With regard to the CbCR Transitional Safe Harbour Rule and the UTPR Transitional Safe Harbour Rule, the draft bill stipulates that their commencement date cannot exceed a period of more than 18 months from the publication of this law.

The legislation submitted for public consultation on 23 February 2024 is available [here](#) (as a PDF and in Greek only).