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Employment Notes

01/10

New Ministerial Decision Extends Digital Employee Card System

Under Ministerial Decision No. 16973/2025, the Digital Employee Card System was extended, starting 26 June 2025, to additional sectors, including the following:

- electricity, natural gas, steam, and air conditioning;
- wholesale and retail trade, repair of motor vehicles and motorcycles;
- financial and insurance activities;
- administrative and supportive activities in the field of tourism.



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## Presidential Decree 62/2025: Reforming Labour Law in Greece

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With the publication of Presidential Decree 62/2025 (Government Gazette A' 121/11-7-2025), the new Labor Law Code comes into effect, replacing the previous Code of Individual Labor Law (P.D. 80/2022). This decree consolidates the provisions of labor law into a single, unified text, structured into three main sections: Individual Labor Law, Collective Labor Relations Law, and the Law on Health and Safety Protection – Labor Inspection.

## Consumer Protection Notes

02/10

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### Complaint and Report Management by the Interagency for Market Control Unit

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Pursuant to Ministerial Decision No. 35887/2025 issued by the Minister of Development, a formal system has been established for managing reports and complaints falling within the scope of the Interagency for Market Control Unit ("DIMEA"). The decision introduces specific evaluation criteria and procedures for handling submitted reports and complaints, as well as a methodology for planning supervisory actions. This includes administrative inspection procedures based on risk analysis and the categorization of reports and complaints following their assessment. The system applies to reports and complaints concerning violations of the rules governing:

- a) The regulations on the circulation and trade of goods and the supply of services ("rules of DIEPPY").
- b) Street and outdoor commerce,
- c) The distribution of single-use plastics.
- d) Use of payment acceptance means (POS, IRIS, etc.).
- e) Unfair profiteering.
- f) E-commerce.
- g) The "household basket" scheme.
- h) Fuel pricing.
- i) The Greek trademark.
- j) Companion animals.



k) Price reduction announcements.

Under this framework, all reports and complaints are evaluated and either subjected to administrative review or filed for future reference, with the possibility of re-evaluation at a later stage. It is important to note that the outcome of the evaluation remains confidential, does not constitute an enforceable act, and is neither made public nor communicated to the complainant or any third party.

## Tax Notes

03/10

### Greece Introduces Mandatory B2B E-Invoicing from July 1, 2025

Starting **1 July 2025**, Greece is authorized under EU Council Decision 2025/502 to implement mandatory B2B e-invoicing through the myDATA platform, gradually phasing out paper invoices for all domestic B2B transactions by **31 December 2027**.

Under the new regime:

- E-invoices must be structured according to EU standards,
- Invoices must be transmitted in real time to receive a unique identifier (MARK),
- Invoices must then be delivered to recipients following electronic submission.

Notably, expenses and inventory items not transmitted electronically via myDATA will not be eligible for corporate tax deductions, in line with updated tax compliance rules.

Meanwhile, the 4th phase of mandatory B2G invoicing has been postponed to **1 September 2025**.

Greece is required to formally notify the European Commission regarding its national rollout and may extend or discontinue the B2B invoicing framework in alignment with the VAT in the Digital Age (ViDA) framework initiative.



### Key Reforms to Greece's Non-Domicile Regime

The Greek government has announced targeted reforms to modernize its non-domicile/repatriation tax framework.

Key updates include:

- Exemption from Greek donation or inheritance tax of movable property situated outside Greece both in the name of the HNWI acquiring same or in the name of his heirs/ beneficiaries.

- Flexibility for international HNWl families, allowing spouses and dependents to join the regime at any time during the 15 years period.
- Inheritance tax exemption on movable property situated outside Greece, held by Greek citizen who relocated to Greece, provided they have lived outside Greece for a period of 5 years (instead of 10 as currently provided in the law).
- Family offices regime is amended to provide for the management of property held by non-Greek tax residents as well, while the minimum yearly spend requirement is decreased to the amount of euro 250k.

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## CJEU Confirms Legality of Spain's Indirect Shareholding Tax Scheme

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On 26 June 2025, the Court of Justice of the European Union (CJEU) delivered its judgment in Joined Cases C-776/23 P – C-780/23 P, upholding Spain's tax treatment of financial goodwill on indirect shareholdings.

The Court confirmed the annulment of the European Commission's 2020 decision, which had previously classified Spain's corporate tax deductions for financial goodwill on indirect shareholdings as unlawful state aid.

Key points from the decision:

- The amortisation rules under Article 12(5) of the Spanish Corporate Income Tax Law (TRLIS) do not constitute new state aid,
- The Court reinforces the principles of legal certainty and protection of legitimate expectations.
- Leading appellants included Banco Santander, Telefónica, Iberdrola, Sociedad General de Aguas de Barcelona, and Ferrovial.

As a result, Spain is not required to recover any aid related to indirect shareholdings, except under the limited conditions explicitly maintained in earlier Commission decisions.

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## New Tax & Rental Compliance Measures in Greek Customs and Tax Bill

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The bill proposes key reforms to tax compliance, property leasing, and custom clearance rules, aiming to modernize the legal framework and promote fiscal transparency.

Key highlights:

- A tax authorities' real estate registry is introduced to keep record of all Greek real estate; its operation will be supported through interfaces with data kept with the Ktimatologio and taxpayers data filed with state authorities, to support combating tax avoidance/ evasion.
- Mandatory Bank Rental Payments: All rental payments must now be made via bank transfer.

Failure to comply results in:

- Tenants losing access to rental related tax benefits (e.g., rental refunds), and
- Property owners forfeiting tax deductions for property maintenance expenses and the 5 % rental income tax credit.

- Penalties for non compliance with the digital delivery notes are increased.
- Short-term rental income is subjected to the “business levy”.
- VAT rules are amended to incorporate Dir 2020/285 provisions.

## DMA Notes @Greece

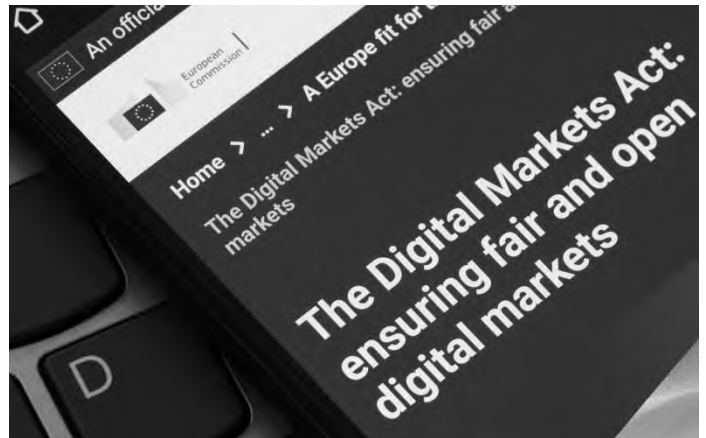
04/10

### Short Guide on the Digital Markets Act issued by the Hellenic Competition Commission

The Hellenic Competition Commission (HCC) has published a short guide to the EU Digital Markets Act, adapted from an initiative by the Belgian Competition Authority and tailored to the Greek context.

This short guide is intended as an easy reference for Greek businesses as well as legal advisors, and can be accessed through the website of the HCC following the link below:

<https://www.epant.gr/enimerosi/dimosieyseis/odigoi/item/3185-i-praksi-gia-tis-psifiakes-agores-dma-syntomos-odigos.html>



## Market Regulation Notes @Greece

05/10

### End of Application of Gross Profit Margin Cap Measure in Greece

As of July 1, 2025, the gross profit margin cap on essential goods and fuels has ceased to apply, marking the end of its nearly four - year application.

To reinforce market oversight, the establishment of a new independent authority has been announced to enforce aspects of consumer law and market regulations, consolidating functions currently exercised by multiple governmental services.



Other market supervision measures, such as the "Household Basket" and the mandatory advance announcement of price increases, remain in force until at least October 2025.

## Competition Law Notes @EU

06/10

### Delivery Hero and Glovo Fined €39 Million for Online Food Delivery Cartel



The European Commission (Commission) has fined Delivery Hero and Glovo a combined €329 million for (a) entering into a reciprocal no-hire (no-poach) agreement concerning each other's personnel, (b) exchanging commercially sensitive information in relation to commercial strategies, prices, capacity, costs and product characteristics and (c) partitioning national markets in the EEA for online food delivery services.

The case marks the Commission's first competition infringement decision focusing on anti-competitive no-poach agreements in the labour market. It also addresses how minority shareholdings can facilitate collusion. Delivery Hero held a minority stake in Glovo before acquiring full control, which according to the Commission enabled multi-level coordination between them. Both firms settled the case, receiving a 10% fine reduction.

### Google Android: Advocate General Recommends that the CJEU Dismiss Google Appeal

The Advocate General has recommended that the Court of Justice of the European Union (CJEU) dismiss Google's appeal against the €4.124 billion fine imposed for abusing its dominant position regarding the Android ecosystem. The original fine, set by the Commission in 2018 at €4.34 billion, was slightly reduced by the General Court (GC), which largely upheld the core findings of the Commission. Google's conduct included requiring device manufacturers to pre-install Google Search and Chrome to access the Play Store, restricting the use of unapproved Android versions in devices, and offering revenue shares conditioned on excluding rival search engines.

The Advocate General emphasised that the Commission did not need to conduct a counterfactual analysis to establish abuse in this case, noting that Google's practices created a 'status quo bias' that unfairly disadvantaged competitors. Moreover, the Advocate General underlined that performing an analysis of a hypothetical as-efficient competitor's capacity to replicate the conduct under examination is not appropriate in this case, due to Google's dominance in several markets and its ability to benefit from strong network effects. According to the Opinion, the features of digital markets, such as dominance across multiple markets, rapid innovation, access to vast amounts of data, multi-sided platform dynamics, and specific patterns of user behavior, reduce the relevance of the replicability analysis by equally efficient competitors.

The Advocate General further supported the GC's view that while Revenue Share Agreements were not abusive themselves, they formed an integral component of Google's overall strategy to cement its dominant position in the online general search market, at a time when the importance of the mobile internet was growing significantly, and thus part of a single and

continuous infringement. On the recalculation of the fine, the Advocate General found the GC's fine adjustment lawful, despite the alleged lack of detailed reasoning.

AG opinions are not legally binding on the CJEU but the latter tends to side with such opinions. The CJEU's decision is eagerly awaited by the legal community due to its impact on antitrust enforcement in the digital economy.

## Merger Control Notes @EU

07/10

### Commission Approves UniCredit's Acquisition of Banco BPM Subject to Divestments



The Commission has conditionally approved UniCredit's acquisition of Banco BPM, Italy's third-largest banking group, after identifying local competition concerns in the Italian retail and SME banking markets, due to significant branch overlaps in 181 local areas. To address these concerns, UniCredit committed to divest 209 local branches with compliance monitored by an independent trustee under Commission supervision.

The Commission had rejected Italy's request to review the merger under national rules, citing the cross-border importance of safeguarding competition in a key sector like banking. In parallel, Italian authorities imposed broader remedies on the parties under the national "golden power" regime, which allows Italian authorities to review both foreign and national transactions in strategic sectors. This triggered an informal inquiry by the Commission into Italy's use of these powers in domestic bank mergers.

### Commission Opens In Depth Investigation into Mars' Acquisition of Kellanova

Despite the US antitrust authority (FTC) having given unconditional approval to Mars' acquisition of Kellanova, the Commission has launched a Phase II investigation under the EU Merger Regulation into Mars' proposed acquisition of Kellanova (formerly Kellogg's). The Commission's in-depth probe will assess whether the transaction could reduce competition in several national markets across the EEA by significantly strengthening the parties' buyer power vis-a-vis retailers, through the combination of major brands like Pringles and Kellogg's cereals with Mars' existing portfolio in confectionery, snacks, and pet food. The investigation will also consider how the parties' combined brand strength might limit choice and innovation.

A final decision is expected by the end of October 2025.



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## CJEU's Ruling on Asset Swaps

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The CJEU upheld the Commission's 2019 decision approving RWE AG's acquisition of certain renewable and nuclear electricity generation assets from E.ON SE, rejecting appeals brought by several German regional utilities. The appellants had argued that the transaction would harm competition by strengthening RWE's dominant position in electricity generation and wholesale supply, potentially raising consumer prices.

The CJEU rejected both substantive and procedural claims, including allegations of failure to apply Article 101 TFEU to the transaction in parallel to the Merger Regulation, of errors in market analysis and competitive assessment, and of imposing an excessively high burden of proof during the appeal process.

Importantly, the CJEU clarified that multiple transactions constitute a single concentration under merger control rules if they are necessarily interdependent and together result in one party gaining sole control, or multiple parties gaining joint control, over one or more undertakings. The CJEU emphasized that the concept of a 'single concentration' does not apply when independent parties acquire control over different targets, such as in asset swaps.

## FDI Notes@EU

08/10

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### Reform of EU FDI Screening Regulation

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Following a year of debate, EU Member States have reached agreement on a revised version of the Foreign Direct Investment (FDI) Screening Regulation, aiming to close enforcement gaps, enhance consistency across national regimes, and strengthen oversight of foreign-controlled investments, while allowing national authorities to maintain or adopt stricter rules.

The updated draft expands the scope to include EU-based investors ultimately controlled by non-EU entities, addressing enforcement gaps identified in the *Xella* case. It introduces a clearer 45-day timeline for initial screening, while allowing flexibility for extended reviews. The list of sensitive sectors subject to mandatory screening has been refined to target specific technologies relevant to security and public order. The provisions of Law 5202/2015 on the Greek FDI screening regime already reflect some of the proposed amendments, e.g. as to EU-based investors.

Final adoption is expected in 2026, with a 24-month implementation period by Member States.





## FDI Notes@Greece

09/10

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### Issuance of the Act Establishing the Interministerial Committee for the Control of Foreign Direct Investments

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The Act of the Council of Ministers establishing the Interministerial Committee for the Control of Foreign Direct Investment has been published.



## State Aid Notes@EU

10/10

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### New EU State Aid Framework to Boost Clean Industry

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The Commission has replaced its Temporary Crisis and Transition Framework with the Clean Industrial State Aid Framework (CISAF), in force until 2030.

The CISAF sets out conditions under which Member States can support the rollout of renewable energy, industrial decarbonisation, clean technology manufacturing, and temporary electricity price relief for energy-intensive users exposed to global competition. The framework introduces fast-track approvals for new renewable and low-carbon fuel projects, expands support for electrification, hydrogen, and carbon capture, and allows targeted tax incentives. It also facilitates strategic investments in critical raw materials and supports cohesion by allowing more generous aid in less developed regions.

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### General Court's Judgement in Ryanair

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The General Court rejected Ryanair's action to annul the Commission's decision approving Germany's €400 million rescue package to Condor Flugdienst GmbH (Condor), ruling the support was lawful under EU state aid rules. The aid, provided

through loans and state guarantees, was intended to offset damage caused by travel restrictions during the COVID-19 pandemic.

Ryanair claimed the Commission should have opened a formal investigation, arguing that Condor was already in financial difficulty before the pandemic and thus not eligible for aid under the relevant framework. The Court rejected this finding that the aid specifically compensated for COVID-related travel restrictions and that Ryanair failed to show serious doubts about the measure's legality warranting a formal investigation. Additional claims - that the measure was disproportionate, discriminatory, or contrary to EU principles on freedom of establishment and services - were also dismissed.

The contents on the LLF Flash Notes have been prepared for general information purposes only and do not constitute legal advice, legal opinion or professional advice. For specific legal or professional advice on any topic or additional information, please contact:

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