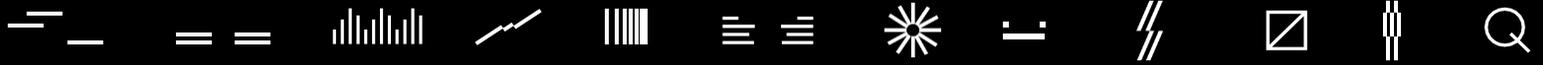


November 2025



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## Introduction

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### 01/05

On the 11<sup>th</sup> of November 2025, Joint Ministerial Decision No. 64260/11.11.2025 (“**JMD**”) of the Ministers of Foreign Affairs and Development was published in the *Official Government Gazette*. The JMD regulates the content of the application form, the submission procedure, and supporting documentation required for filing screening applications under the Foreign Direct Investment (“**FDI**”) control mechanism established by Law 5202/2025 (“**Law**”).

The JMD gives operational effect to Greece’s new FDI control regime.

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## The procedure

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### 02/05

The JMD sets out the procedure for submitting a screening application and the supporting documentation required for filing. Applications may be submitted in person by the foreign investor, their legal representative, or another duly authorised person, or by registered mail to the General Protocol of the Ministry of Foreign Affairs, in both hard copy and digital form.

The filing of the application triggers the five-day review period provided in paragraph 2 of Article 7 of the Law. During this period, the Secretariat of the Interministerial Committee for the Control of Foreign Direct Investment, operating within the B1 Directorate for Extroversion Planning and Coordination of Extroversion Institutions of the Ministry of Foreign Affairs,

verifies whether the FDI falls within the scope of the Law and examines the formal completeness of the file. For applications submitted by registered mail, the five-day period commences on the date of receipt.

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## The application and supporting documentation

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03/05

According to the JMD, to be considered complete, the application file must include:

- 1) Application form, as provide in Annex B of the JMD (“**Application Form**”), completed in both Greek and English.
- 2) Solemn declaration confirming that the FDI is subject to the control mechanism established by the Law;
- 3) Supporting documentation, including:
  - a. Documents certifying a mandate, authorization, or power of attorney appointing a legal representative or agent.
  - b. A copy of the investment contract, side letters, and any additional related agreements regarding the rights and obligations of the parties concerned or third parties, and the investment timetable. If the investment contract is not yet signed, a letter of intent or equivalent document evidencing the investment plan may be submitted initially, with the investment contract provided at a later stage, if signed during the review period.
  - c. Recent (within two months) commercial register extracts for the target company, showing establishment, registered office, activity codes, representation, management, and statutory purpose.
  - d. Documentation on the shareholding structure of the target company.
  - e. Commercial register extracts for the foreign investor, showing establishment, registered office, activity codes, representation, management, and a summary of the articles of association and any amendments. Where the foreign investor is a natural person, identity documents must be provided.
  - f. Documentation on the shareholding structure of the foreign investor. Where the foreign investor is a natural person, a detailed curriculum vitae (“**CV**”) must be provided.
  - g. The three most recent audited financial statements of the foreign investor.
  - h. Declaration of the Ultimate Beneficial Owner (“**UBO**”) of the foreign investor filed in the foreign investor’s country of establishment or in the Greek UBO Register.
  - i. Shareholding chart illustrating the companies in which the foreign investor participates. If natural persons, who are shareholders or managers of the foreign investor or its affiliates, also participate in or manage other companies, these companies must be shown in a separate shareholding chart.
  - j. CVs of the main shareholders and management.
  - k. PEP declaration and declaration of non-involvement in terrorist activities.
- 4) USB stick containing the application in both Greek and English, the solemn declaration, and supporting documents in digital form, or scanned copies, if not digitally issued.

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## Special provisions

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### 04/05

The JMD further clarifies the language requirements for the solemn declaration, the verification of authenticity of supporting documents when they originate from countries not parties to the Hague Convention of 1961, as well as the prevailing version in the event of discrepancies between paper and digital submissions.

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## Entry into force and next steps

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### 05/05

The JMD entered into force upon its publication in the *Official Government Gazette*, on 11 November 2025.

The JMD is one of the two ministerial decisions required under Article 16 of the Law. The second ministerial decision, concerning the designation of the responsible body and the methodology for the calculation and the collection of fines for non-compliance with the Law, has not yet been issued.

In August 2025, the Ministry of Foreign Affairs published an announcement (“**Announcement**”) stating that it would not accept FDI screening applications until the ministerial decisions are issued. Additionally, administrative fines provided for under Article 15 of the Law for failure to notify an investment that falls within its scope would not be imposed for the period prior to the entry into force of the above secondary legislation.

Following the publication of the JMD, the Announcement was amended accordingly.

Foreign investors may submit FDI screening applications in line with the JMD requirements as of 11 November 2025, while administrative fines under Article 15 of the Law will not be imposed until the second ministerial decision is issued.

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