

Smaro Anagnostou



Smaro Anagnostou is an experienced and internationally recognized tax expert and heads up our Tax practice. She leads our Tax team in delivering ongoing tax consultancy to corporate clients and providing transactional support to domestic and international clients working with our M&A, Capital Markets, Banking & Finance, Project Finance, and Real Estate teams. In this role, she has helped to shape and execute many complex and innovative corporate transactions.

Smaro also provides legal tax consultancy to high-net-worth families and individuals on wealth and succession planning, protection of assets, co-ownership and transfer of assets.

She has extensive experience in advising individuals and companies on tax investigations, audits, dawn raids, and providing representation before the Administration and Administrative Courts in challenges to tax authority decisions, assessments, technical enquiries, applications for rebates and settlement of fines.

Smaro is ranked as Recommended Lawyer for Tax in the Legal 500 EMEA and a Key Individual in the Chambers Europe Guide.

Before joining Lambadarios, Smaro worked as counsel for a number of major firms, including establishing and leading the legal division of PwC in Athens, heading the tax practice of a leading Athens law firm, acting as senior legal counsel to the PeopleCert Group and as executive counsel to the Eurobank Group.

Tax - Corporate

Smaro is one of the leading experts on taxation in Greece. She advises corporate and institutional clients, including investment funds, on the structuring and tax treatment of inbound and outbound investments, mergers and acquisitions, restructurings and insolvencies, privatizations, and commercial agreements.

As well as advising on the tax implications of, and the most efficient structures for, executing major corporate transactions and investments, Smaro also advises clients on real estate and other forms of asset ownership, the effect of double taxation treaties, and the direct and indirect taxation (including vat) implications of local and cross-border transactions, financing techniques and transfer pricing.

She is also experienced in Litigation & Dispute Resolution, supporting clients in disputes with the Greek tax authorities and before the courts.

Working closely with our employment practice, she also supports clients in matters relating to executive and employee remuneration.

Notable Tax - Corporate cases

- Advised **BriQ REIC** on profit distribution ratios, and extraordinary income – capital gains distribution, according to reic special legislation and ongoing changes in the law, commenting on the Hellenic Fund and Asset Management Association’s relative opinion.
- Advised **BriQ REIC** on the execution and tax implementation of distribution of shares to company’s executives, under the newly enacted tax exemptive provisions on shares/ shares option schemes; communication to this effect with the Greek Capital Markets Committee, facilitated the transposition of applicable rules to processes and documentation in place by the Committee.
- Advised **BriQ REIC** a Greek registered reic, on corporate – tax law compliance issues regarding the distribution of advance dividends by related parties, and the tax treatment of lease payments deriving from covid-19 subsidies and tax relief measures in place for the amount of €1,5m.
- Advised Whirlpool Hellas before the tax authorities and Administrative Courts, in its dispute with the tax authorities regarding the assessment of stamp duty for tax years 2013 and 2014 for the amount of €1,5m.
- Advised **Whirlpool Hellas** on tax compliance re write off of overdue receivables – bad debts, taking into consideration recent changes in applicable legislation, not yet fully clarified, and the group’s credit policy and practices to this effect for the amount of €6m.
- Advised **Goodyear Tyres** on tax issues arising in the course of its daily operations; call-off stock arrangements business restructuring between the group companies in Europe, and their impact on corporate and VAT taxation were examined; compliance with Greek rules transposing EU VAT provisions on the subject matter recently enacted, and corporate taxation rules were examined to discuss due implementation in Greece.
- Advised **Wind Hellas**, one of the leading Greek telecommunications’ companies, on the tax treatment of the bond loan issue, acting for the financial institutions.
- Advised **Align Technology**, a US orthodontics company, on structuring its Greek activities and operations; advice was sought with respect to permanent establishment issues under DTT signed by Greece, resale obligations under income tax law, and employer and employee taxation under the DTTs and national law.
- Advised an investment management company, on the tax issues related to the structuring of the acquisition and immediate resale of a Greek bank’s portfolio of real estate assets, to non-identified end buyers, via the assignment of pre-contract rights for the amount of €7,5m.
- Advised a HNWI, acting via his UK investment entity, on its tax dispute with the Greek tax authorities, re its special real estate tax and ubo tax registration obligations, resulting in the confiscation of prime real estate held for the amount of €6,5m.

Tax - Private & Personal

Smaro advises high-net-worth individuals and families on inheritance, wealth and succession planning, protection of assets, co-ownership and transfer of assets.

Languages

- Greek
- English
- French

Qualifications

- LLM in International Business Law, Queen Mary & Westfield College, University of London
- LLB, School of Law, University of Athens