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[?. ???? 8 ??? 9 ??? ?.4607/2019](#)

[?. ???? 10 ??? ?.4607/2019.](#)

[?. ???? 49 ??? ?.4607/2019](#)

**? .2111/2019 ??????????? ??? ???????? ??? ?????? 8 - 10 ??? 49
???. ?. 4607/2019 (?' 65) ????** ??? ??????????? ?????????????????? ???
?????? ??? ?? ??????????? ??? ?? ??????????? ??? ?? ??????????????? ???
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?????, 13/06/2019

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???. ?/???: ???? 2 - 4

???. ??????: 106 72 ????

?????????: 2132122400

Fax : 210 3645413

E-Mail : dfpa.a1@1992.syzefxis.gov.gr

Url : www.aade.gr

? 2111/2019

????: ??????????? ??? ???????? ??? ?????? 8 – 10 ??? 49 ??? ?.4607/2019 (?' 65)????? ??? ???????????
????????????? ??? ??????? ??? ?? ?????????? ??? ?? ?????????? ??? ?? ?????????? ??? ?? ?????? ??? ?? ???????
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????????????? ?? ???????? ??? ?????? 8 ??? 10 ??? ?????? ?????? ??? ?.4607/2019 (?' 65) «?. ??????
?? ?????????? ??? ?? ???????? ?????? ?????? ??? ?????? ??? ?????????? ??? ?? ?????? ??? ?? ??? ?? ??????
(?) 2016/1065, III. ?????????? ??? ?????? 1, 2, 4 ??? 5 ??? ?????? 2 ??? ??? ?????? 4, 6, 7 ??? 8 ??? ??????
1164/2016, IV. ?????????? ??? ?. 2971/2001 ??? ????? ??????», ?? ??? ?????? ?????????????? ? ?????? ???
(?.2859/2000), ??? ??????, ?? ??? ?????? (??) 2016/1065 ??? ?????????? ?????? ??? ?? ??? ?????????? ???
?????? ??? ?? ?????????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? 9 ??? ?????? 19 ??? ?????? ???
?????, ?????????????? ?? ?????????? ??? ?????? 49 ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????
????????????? ? ?????????? ?' ??? ?????????? 15 ??? ?????? 14 ??? ?????? ??? ??? ?????????? ??? ??????????
?? ?????? ??? ?????????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ???

? . ???? 8 ??? 9 ??? ?.4607/2019

?? ??? ?????????????????? ?????????? ??? ?????? ?????????????????? ??? ?????????????? ??? ?????????? ? ?????? ???? (??)
2016/1065 ??? ?? ????????, ? ?????? ?????????? ??? ?????? ??? 2006/112/?? ??? 01.01.2019. ?????? ??? ???
????????? ??? ? ?????????? ?????????????? ?????????????? ??? ?????????? ??? ?????? ??? ?????. ??.,
????????? ??? ? ?????????? ?????????????? ?????????????? ??? ?????????? ??? ?????? ??? ?????? ?????????? ????. ??,
????????? ??? ?????? ??????, ?? ??? ?????????? ?????? «?????????» ?????? ??? ??? ???, ?? ?????? ????
????????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ??????
????? ??? ??? ?????????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ??????
????? ??? ?????????? ? ??-??????????, ?????? ??? ?????? ??? ?????? ?????? ?????? ?????? ??????.

?? ?????? ?????????? ??? ?????? ?????? ?????? ???, ?? ??? ?????? ?' ??? ?????????? 1 ??? ?????? 9 ???
? .4607/2019 ?????????? ??? ?????? 12? «?????????» ??? ?????? ???, ?? ?????????? ??? ?????? ?????? ???
01.01.2019 ??? ?????? ?? ?????? ??? ?????? ??? ?????? ??? 31 ?????????? 2018. ??? ?????? ???
????????? ?????? ???, ?????????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ??????.

1. ?? ?? ??? ?????? 12? ??? ?????? ??? ?????????? ??? ?????? ?? ??? ?????? ??? ?????????? ??? ??????
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????????? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ???
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?? ?????? ??????????, ?????????????? ??? ?? ?????? ??? ?????????? ??? ?????? ?????? ?????? ?????? ?????? ???
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?? ??? ?????????? ??? ?????? ?????? (?? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
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?? ??????) ??? ? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
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1.1 ?? ?? ?????????? ? ?? ?????? 1 ??? ?????? 12? ??? ?????? ?? ??? ??????, ?????? ? ?????? ???
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?? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? «????? ??????» ?? ??????, ???
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?? ??????????, ?????? ?????? ??? ?????? ??? ?????? ?????? ?????? ?????? ?????? ??? ?????? ??? ?????? ???, ?
?????????, ??? ?????? ?????? ????. ??., ??? ??? ?????? ?? ?????? ?????? ?????? ?????? ??? ?????? ???
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?? ?????????? ? ?? ?????? ?????? ?????? ??? ?????? ?????? ??? ?????? ?????? ?????? ?????? (????? ???) ?? ??
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?) ?? ??????? ??? ????? ?? ?????????? ??????? ??? ?????????? ??? ?????? ?????? ?????? ???, ?????? ? ??? ??? ???????
???? ??????? ?????? (??? ? ??? ????? ??????????? ???), ?????????? ??? ?? ??? ?????????????? ??? ??
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???). ??????, ??? ??????? ??? ?? ??????? ??? ?????? ?? ?????? ?? ?????????? ??? ?????? ??? ?????????????? ???
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????? ??????? ?????? ?????? ???). ????????, ??? ? ?????? ??? ?????? ?????????? ??? ?? ?????? ??? ?????? ??? ?????? ???
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????????? ??? ?? ??? ?????? ???????, ??? ?????????? ??? ???, ?????? ? ??? ?????? ?????? ?????? ?????? ??? ?? ???
????????? ??? (????????? ??? ?????? ??????? ??? ?????????? ??? ?????? ??? ?????? ?????? ?????? ?????? ?????? ???
????? ? ??? 30% ?????????? ?????????? ??? ?????? ??? ??????). ?? ??????, ?????? ?????? ?????? ??? ??????????
?????????? ?? ??? ?????? ?????? ?????? ??? ?????? ?????? ?????? ??? ?????? ?????? ?????? ??? ?????? ?????? ???
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?) ?? ??????? ??? ????? ?? ?????? ?????? ??? ?????? ?????? ??? ?????????? ?????????? ??? ?????? ??? ?????? ???????
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(??? ?????????? ?? ??? ?????, ??? ?????? ?????? ???????, ??? ?????? ??? ?????????? ??? ?????? ??? (?? 1601, 1602, ??
1603) ?????????? ??? ?????? ??????? ???, ??? ?? ??? ?????? ??? ?????????? ??? ?????? ??? ?????????? ??? ?????? ???
???). ?? ?????? ?????? ?????? ?????? ??? ?????????? ?????????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????? ???
?? ?????? ?????????? ?????? ??? ?????? ?????? ??? ?????????? ?????? ??? ?????? ??? ?????? ???, ?????? ?????? ???
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?) ??????? ??? ?????? ?????????? ?????????? ??? ?????? ?????? ?????? ??? ?????????? ?????? ??? ?????? (?????? ???
????? ?? ??? ?????? ??????????), ??????? ???, ?????? ??? ?????? ?????????? ??? ?????? ?????? ?????????? ???
????????? ??? ?? ???' ?????? ??? ?????? ?????????? ?????? ?????? ?????? ??? ?????? ?????? ???.

?) ??????? ?????????? ??? ?? ?????? ??? ?????? ?? ?????? ?? ?????????? ?????? - ?????????? ??? ?????? ?????? ???,
????? ? ??? ?????? ?????????? ??? ?? ??? ?????? ?????? (??????) ??? ? ??? (????????? ?????????? ??? ?? ???
????????? ?????????? ???) ?????? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ???.

1.2 ?? ??? ?????????? 2 ??? 3 ??? ?????? 12? ??? ?????? ???, ?????????? ? ?????????? ?????????? ??? ?????? ???
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1.2.1 ??? ?????? ??? ?????????? ??? ?????? ?????????? ??? ?????? ?????? ?????? ??? ?????? ?????? ??? ?????? ???
(????? ??? ?????? ?????????? ??? ?????? ?????????? ??? ??????), ?????????? ??? ?????????? ??? ?????? ??? ?????? ???
? ? ?????? ??? ?????????? ??? ?????? ??? ?????? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ???
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????? ???????, ?? ?????? ?????? ?????????? ??? ?????? ??? ?? ?????? ?????? ??? ?????? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???, ?????????? ???
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????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
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???? ? ??????? «?» ??? ?? ? ??????? «?» ??????????? ??? ??????? ?????????? ??? ?????????? ?' ??? ?????????? 4 ??? ?????? 30 ??? ?????? ??.
????????????? ??? ?? «?» ??? ?? «?» ??? «?» ???????????, ?????????? ??? ??? ?? ??? ?????? ?????????? ????????
????????????? (????? ??????????? ??? ?? ??????, ?????????? ?????????? ???). ? ??????? ?? ???, ?????? ?
????????????? «?» ??? ?????? ?? ??????? ?? ??? ?? ?????????? ??? ??? ?????????? ?????????? ??? ??????????
????????? ??? ??????? ??? ??????? ??? ?????? «?», ??? ??? ?? ??????? ??? ?????????? ??? ??? ?????? «?»
???? ??? ?????? ?????????? ??? ?????????? ??? ?? ?????????? ??? ??? ?????? ?????????? ??? ??? ?????? ???
??? ?? ??? ?????? ??? ??????????. ?? ?, ?? ?????? ?? ?????????? ??????????, ? ??????? «?» ?????? ?????????? ??????????
????? ??? ?????????? ??? ?????????? ??? ??? ?????????? «?», ? «?» ?????? ?????????? ?????????? ?????? ???
????????? ?????? ?????????? ??? ?????????? ??? ??? ??????? «?», ??? ?? ?????????? «?» ??? «?» ??? ??????
????????? ?????? ??? ?????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ??? ?????? «?» ?????? ??? ??????????
?' ??? ?????????? 4 ??? ?????? 30 ??? ?????? ??.

???? ???? ?????????? ?????????? ??? ?????? ?????????? ?????????? ?? ?????? ?????? ??????????????:

2. ?? ??? ?????????? ?' ??? ?????????? 1 ??? ?????? 9 ??? ?. 4607/2019 ?????????? ??? ?????????? 1? ??? ????
19 ??? ?????? ??? ??? ?????????? ? ?????????? ??? ?????????? ?????? ??? ?????????? ?????? ? ??? ?????? ?????????? ???
????????????? ??? ?????? ?????????? ?????? ??? ??? ?????? ?????????? ??? ?????? ?????????? ??? ?????? ???.

???????????????? ? ??? ??????????? ??????, ?????????? ????? ?? ?????? ??? ?????? ??? ?????? ?? ?????????????? ?????? ? ??? ?????????? ?????? (????????? ??????).

3. ?????????????????????????? ??? ?????????????? ??? ?????? ?????????????? ??? ?????? ??? ??????????????, ?????????????????? ??? ? ?????????? ???
????????????? ?? ??????? ?? ?????????? ??? ?????????? ??? ?????? ??? ?? ?????????????? ?????????? ??? ?????????????? ??? ?????????????? ?? ??????????
????????????? ??? ?????????? ??? ?????? (??? ? ???). ? ????? ?????????? ?????????? ??? ?????? ??? ?????? ?????????? ???
????????????? ??? ?????????? ?????????? ??? ?????? ?????????? ?????.

? . ???? 10 ??? ? .4607/2019.

??????????, ??? ?????? ??? ?????? ????? ?????? ?????????????????? ??? ?? ???? ?????????? ?????????? ???
????????????? ?? ???? ?????? ??????????, ?? ?????????? ??? ?????? ?????????? ? ??? ?????? ?????? ?????? ???, ??
????? ?????????? ??? ??? ?????? ?????? ??? ?????????? ??? ??? ?????? ??? ??? ?????? ??? ?????? ?????? ??????.
????????????? ??? ? ?? ??? ???????????, ? ?????? ?????????? ??? ??? ?????? ?????? ?????? ?????? ?????? (????. ?
????????? ??? .1075/2000 ?????????? 1), ??? ?????? ??? ?????????? ??? ?? ?????? ?????? ?????????? ?????? ??????
????? ???????,

5. ???????????, ?????????????????? ??? ??? ??????????? ??? ?? ?????? ?????????????????? ??????????? ??? ??
????????????????? ??? ?????????? ??? ?????? ??????? ?????? ?????? ?????? ?????? ?????? ??? ?????? ??? ??,
????????? ????, ?????? ??????????? ??? ?????? ?????? (??????? ??? ?????? ??????? ???????????), ? ?????? ?????? ??????????
??? ?????????? ??? ?????? ???, ?????? ??? ?????????? ??? ?????????? 2, ????. ?!, ??? ?????? 14 ??? ?????? ???.
????????? ??? ??? ??????? ??? ??? ??? ?????????? ??? ?????? ?????? ??? ?????????? ?????? ? ?????????? ???????????,
????? ??? ?????????? ??' ??? ?????????? 1 ??? ?????? 35 ??? ?????? ????. ? ?????????? ??? ?????????? 9 ???
????? 19 ?????????? ??? ??? ?????????? ??? ?????? ?????????? ??? ?????? ??? ?????????????? ??? ?????? ??? ? ?????????? ?
????????? ???????????, ?????? ?????????? ??? ?????????? ?????? ?????? ?????? ?????????? ?????? ?????????? ???????????,
????????? ?? ??? ?????????? ??? ?????? 14 ??? ?????? ???.

? . ???? 49 ??? ?.4607/2019

6. ??? ????? ?????????????????? ?????????? ?????????????????? ?? ?????????? ??? ??????. ?) ??? ?????????? 15 ??? ??????
14 ??? ?????? ??? ???, ?????? ??? ?????????? ??????, ?????????????? ?? ?????????? ??? ?????? ??? ?????????? ??? ?????????? ???
??? ??? ?????????? ?????? ?????????? ?????????????? ??? ?????? ??????. ?????????? ?????, ?????????? ??? ?????
????????? ?????? ?????????? (????? ??? 90 ??????) ?????? ?????????????? ?????? ?????? ???????, ?? ?????? ??????
??? ?????? ??? ?????? (????????? ??? ? ???? ???) ?????? ??? ?????? ???, ??? ?????????? ??? ?????? ?????? ???
????? ??? ? ?????? ??? ?????????????? ?????? ??? ??????, ??? ? ???? ?????? ?????? ??? ?????? ?????? ?????? ??????
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2006/112/?? ???. ???. ???. ???.

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Source

URL:<https://taxexperts.gr/????/????????????-??????/?21112019-????????????-??-?????????-??-????????-8-10-??-49-??-?46072019-?-65>