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**?1352/2019 ??????????? ??? ?? ?????????????? ?????? ??? ??
?????????? ??? ?? 2018 ??????? ??? ?????????????? ?????? ??? ??
???. 4 ??? ?? ??????????? ??? ???. 3 ?? ?????????? ?? ?? ???. 1, 2,
??? 5 ??? ?????? 65 ??? ?. 4172/2013**

?????. 1352/19-9-2019

(??? ?' 3558/23-9-2019)

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1. ??? ???????????:

?) ??? ?????????? 4 ??? ?????? 65 ??? ?. 4172/2013 (?' 167) ?? ?????????? ?? ???. 1, 2, 3, ??? 5 ??? ?????
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?) ??? ?????? 29 ??? ??????? ??? ?????????? ??? ??????? ??? ?????? (???????) ?????????? ?? ???.
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2010 ?????????? ?????????? ??? ??? ?????????? ?? ???.
«????? ??? ??????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????????? ?????????? ??? ?????? ??? ?. 4153/2013 (?' 116)
(?..?.), ?? ?? ?????? ?????????? ?' ??? ?' ?????? ?? ?? ?????? ?????????? ?????????? ??? ?????? ?? ???.
????? ??? ??? ?????????? ?????????? ????.

?) ??? ?.142/2017 «????????? ??? ?????????? ??????????» (?' 181), ????.

?) ??? ?????????? ?' «????? ?????????? ?????? ?????? ??????» ??? ?????? ?????? ??? ?. 4389/2016 (?'94)
«????????? ?????? ??? ?????? ??? ?????? ?????? ?????????? ?????? ??? ?????? ??? ??????????»
??? ?????? ??? ?????? ??? ?????? 14 ??? ?????? ????.

2. ?? ??? ?????? ??? ?????????? ??? ?????? ??? ?????????? ??? ?? ?????????? ?????????? ??? ?????????? ??? ??????????
??? ??? (Global Forum on Transparency and Exchange of Information for Tax Purposes) ?. <http://www.oecd.org/tax/transparency/about-the-global-forum/members/> ?? ?????????? ?? ?? ?????????? ??? ??????????
????? (Global Forum on Transparency and Exchange of Information for Tax Purposes/Exchange of Information on
Request/Ratings) ?. <http://www.oecd.org/tax/transparency/exchange-of-information-on-request/rat-negs/>??
????? ?????????? ??? ?????? ?????? ??? ?????? ??? ?? ?????? ??? ?????? ?????? ?????????? (Peer Reviews)
????? ??? ?????? ??? ?????? ??? ?????? ?????? ?????? (?????? 2019).

3. ??? ??? 6.8.2019 ?????? ??? ?????????? ?????? ?????????? ?????????? ?????? ??? ?????? ?????? ??? ?????? ??? («Jurisdictions
Participating in the Convention on Mutual Administrative Assistance in Tax Matters» ?. <https://www.oecd.org/tax/exchange-of-tax-information>Status-of-convention.pdf>).

4. ??? 5.12.2017 ???????????? ??? ?????????? ECOFIN (???????? 15429/17, FISC 345 ECOFIN 1088),
???????, ??????, ?? ??? ???????? ??? ?? ??? ?? ? ?????????????? ?????????????? ??? ?????????????? ??????
(????????? ?), ???, ???????, ?? ??? ?????????? ??? ?????????????? ?? ??? ?? ??? ?????????????? ?? ??? ??????
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(????????? II), ??? ?????????????? ??? ?????????? ??? ?????????? ?????? (?? ?? C 438/5/19.12.2017).
5. ??? ?????. ?. ??? . 1036960 ?? 2017/10.3.2017 (?' 968) ??????? ??? ?????????? ??? ??? «?????????? ???
????????????? ??? ?????? ?????? (?..?.?)».
6. ??? ?????. ?6? 1015213 ?? 2013/28.1.2013 (?' 130 ??? ?' 372) ?????????? ?????? «?????????? ??????????????
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?6? 1145867 ?? 2013/25.9.2013 (?'2417) ?????? ??? ?????????? ?????????? «?????????? ?????????? ???
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????? 41 ??? ?. 4389/2016.
7. ??? ?????. 1 ??? 20.1.2016 ????? ??? ?????????? ?????????? «????????? ??? ?????????? ?????????? ???
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8. ??? ?????. ??? ? 1129284 ?? 2019/13.9.2019 ??????? ??? ?????????? ??? ??? ?????? ??? ?????????? ??????????,,
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?????? ??? ??? 3 ??? ?????? ??? ?. 4172/2013 (?' 167), ??? ??????.
9. ?? ?. 83/2019 (?' 121) «????????? ?????????? ??? ?????????? ??? ?????????? ??? ?????????? ???
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10. ?? ?. 84/2019 (?' 123) «????????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ?????????? ???
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11. ??? ?????. 339 (?' 3051/26.7.2019) ??????? ??? ?????????? ??? ?????? ??? ?????????? ??? ?????????? «?????????
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12. ??? ??/2019 (?' 2901) ??????? ??? ?????????? «????????? ?????? ?????????? ??? ?????? ???
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13. ?? ??????? ??? ??? ??? ?????????? ??? ?????????? ??? ?????? ??? ?????????? ??? ?????? ?? ??? ???
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1. ?? ?? ?????????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ??? . 1 ??? ?????? 65 ??? ?. 4172/2013,
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Sint Maarten

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Anguilla

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Antigua and Barbuda

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Vanuatu

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Kingdom of Lesotho

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Gabon

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Ghana

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Guatemala

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Republic of North Macedonia

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Dominican Republic

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El Salvador

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Ecuador

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Kenya

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Cura çao

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Kazakhstan

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Liberia

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Mauritania

18

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Botswana

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Burkina Faso

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Brunei

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Marshall Islands

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Dominica

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Paraguay

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Jan

25

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Tri

26

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2. ??? ?? ?????????? ?? ?????????? ?? ?????????? 1, 2, 3, 4 ??? 5 ??? ????? 65 ??? ?. 4172/2013 ??? ???.
4153/2013, ?????? ?? ?????????? ?? ?????????? ?? ?????????? ?? ?????????? ?? ?????????? ?? ?????????? ?? ?????????? ???.
????? ?? ?? ?????????? ?? ?????????? ?? ?????????? ?? ?????????? (Convention on Mutual Administrative Assistance in Tax
Matters/MAC), ?? ?????????? ?? ?????? (????? ? ?????????? ?? ?????????? ?? ?????????? ?? ?????? ? ?????? ?? ??????
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2/2

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1

2222222

Grenada

1.1.2018-1.9.2018

2

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Macao

1.1.2018-1.9.2018

3

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the Bahamas

1.1.2018-1.8.2018

4

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Bahrain

1.1.2018-1.9.2018

5

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Peru

1.1.2018-1.9.2018

6

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Hong Kong

1.1.2018-1.9.2018

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?????, 19 ?????????? 2019

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Source

URL:<https://taxexperts.gr/???/??????????-??????/?1352/2019-??????????-??-??-??????????-??????-??-??-??????????-????-2018>
