

**Summarized Explanatory Table for the implementation of sections 23 and 23A of article 8
of the Income Tax Law [laws [N121\(I\)/2022](#) and [N51\(I\)/2023](#)]**

	Article of the exemption		
	8(23)	Article 8(23A) N. 121(I)/2022 <i>employment from 01.01.2022- 29.06.2023</i>	Article 8(23A) N.51(I)/2023 <i>employment from 01.01.2022</i>
First Employment Status	Any employment in the Republic	First Employment in the Republic ever since (occasional excluded)	Employment in the Republic after 15 years of absence (considered as "first employment ¹ ")
Exemption Rate	50% exception of the remuneration from any employment in the Republic	50% exemption of the remuneration from the first employment in the Republic	50% exemption of the remuneration from any employment in the Republic
Remuneration amount	> €100.000	> €55.000	> €55.000
Exemption period	10 years	17 years or until the termination of the first employment, whichever occurs earlier	17 years
Relevant Circular	Interpretive Circular 2017/4 – Income Tax	Circular 10/2022	
Beneficiaries	3 out of the last 5 years (Not to have been a resident in the year preceding the year the employment commenced)	Not to have been a resident at least 10 years prior to the year of commencement of the first employment.	Not to have been a resident at least 15 years prior to the year of commencement of the first employment ¹
	Applicable article depending on the date of commencement of employment		
Employment from 01.01.2012 - 31.12.2021	✓		
Employment from 01.01.2022 - 25.07.2022	✓	✓	✓
Employment from 26.07.2022 - 29.06.2023		✓	✓
Employment from 30.06.2023 and onwards			✓

TRANSITIONAL PROVISIONS

	<p style="text-align: center;">8 (23 A) N. 121(I)/2022 <u>employment from 01.01.2022 - 29.06.2023</u></p>	<p style="text-align: center;">8 (23 A) N.51(I)/2023) <u>employment from 01.01.2022</u></p>
<p>Transition from 8(21)² to 8 (23A) eligible persons are those who:</p> <ul style="list-style-type: none"> ➤ Provide salaried services in the Republic during the years 2016-2021 with an initial remuneration (first 12 months) exceeding €55000 or ➤ The remuneration for the period 26.01.2022 - 26.01.2023 exceeds €55000 	<p>The exemption is granted from the year 2022 until the completion of 17 years from the year of first employment (inclusive).</p>	<p>The exemption is granted from the year 2022 until the completion of 17 years from the year of commencement of the first employment in the Republic (inclusive), provided that the person had continuous employment in the Republic from the date of commencement of his first employment until the tax year 2021.</p>
<p>Transition from 8(23)² to 8(23A) eligible persons are those who:</p> <ul style="list-style-type: none"> ➤ Provide salaried services in the Republic and benefited from the exemption based on Article 8(23) for continuous employment from the year of commencement of employment until the year 2021. 	<p>The exemption is granted from the year 2022 until the completion of 17 years from the year of first employment (inclusive), <u>provided</u> that the person had continuous employment in the Republic from the commencement date of his first employment until the tax year 2021.</p>	

Notes

1. According to the amending law N.51(I)/2023, a person is considered to have " first employment in the Republic" when, for the first time, after a period of fifteen (15) consecutive tax years during which he did not perform any salaried services in the Republic , commences performing salaried services in the Republic either for an employer resident in the Republic or for an employer not resident in the Republic and the term "first employment in the Republic" is interpreted accordingly and differs from the meaning of the term "first employment" before the amendment of Law 121(I)/2022.
2. Based on the Transitional Provisions, the exemption of article 8(23A) (either as it was valid before the publication of the Amending Law N.51(I)/2023 or as it is valid after) is granted provided that all the conditions for granting the exemption are met.
3. A person who was a beneficiary of the exemption of article 8(23A) before the publication of the Amending Law N.51(I)/2023, continues to be a beneficiary of the exemption of 50% of his remuneration from his first employment in the Republic, provided that the conditions of article 8(23A) are met, as it was in force before the publication of the Amending Law N.51(I)/2023.
4. All the above exemptions are granted regardless of whether the person after commencing his employment in the Republic becomes a tax resident of the Republic or remains a non-tax resident.