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Greece

Enforcement of Judgments in Civil and Commercial Matters

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This country-specific Q&A provides an overview of enforcement of judgments in civil and commercial matters laws and regulations applicable in Greece.

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Greece: Enforcement of Judgments in Civil and Commercial Matters

1. What international conventions, treaties or other arrangements apply to the enforcement of foreign judgments in your jurisdiction and in what circumstances do they apply?

Greece applies a three-tier framework, in the following order of precedence:

- directly applicable **EU regulations**;
- **international conventions** binding on Greece, whether ratified by Greece itself or concluded by the European Union on behalf of the Member States; and
- **bilateral treaties** on judicial cooperation.

The domestic regime of the GCCP applies only residually, where none of the above instruments covers the judgment in question (see Question 3).

Where an instrument applies, it displaces domestic law as *lex specialis*.

(A) EU regulations directly applicable in Greece

Regulation (EU) No 1215/2012 (Brussels I bis) – jurisdiction and the recognition and enforcement of judgments in civil and commercial matters. It applies to proceedings instituted on or after 10 January 2015 and abolishes exequatur between Member States. Judgments delivered in proceedings instituted before that date remain governed by Regulation (EC) No 44/2001, which continues to require a declaration of enforceability.

Regulation (EU) 2015/848 (Insolvency, recast) – applicable to insolvency proceedings opened on or after 26 June 2017. Regulation (EC) No 1346/2000 continues to govern proceedings opened earlier.

Regulation (EU) 2019/1111 (Brussels II ter) – matrimonial matters, parental responsibility and international child abduction. It replaced Regulation (EC) No 2201/2003 as from 1 August 2022 and abolishes exequatur for all decisions within its scope.

Regulation (EC) No 861/2007 (European Small Claims Procedure), as amended by Regulation (EU) 2015/2421 – the ceiling was raised to EUR 5,000 with effect from 14 July 2017. A judgment given in the procedure is enforceable in Greece without any declaration of enforceability.

Regulation (EC) No 1896/2006 (European Order for Payment), as amended by Regulation (EU) 2015/2421 – a European order for payment declared enforceable in the Member State of origin circulates without exequatur.

Regulation (EC) No 4/2009 (Maintenance Regulation) – jurisdiction, applicable law (by reference to the 2007 Hague Protocol), recognition, enforcement and cooperation in maintenance matters.

Regulation (EU) No 650/2012 (Succession Regulation) – applicable to the succession of persons who died on or after 17 August 2015; it also creates the European Certificate of Succession.

Regulation (EC) No 805/2004 (European Enforcement Order for uncontested claims) – a judgment certified as a European Enforcement Order in the State of origin is enforced in Greece as if it had been given by a Greek court.

Regulation (EU) No 655/2014 (European Account Preservation Order) – cross-border preservation of bank accounts, including the mechanism for obtaining account information from Greek banks.

Regulations (EU) 2016/1103 and 2016/1104 – matrimonial property regimes and the property consequences of registered partnerships. Greece is one of the Member States participating in the enhanced cooperation, and both instruments have applied since 29 January 2019.

Regulation (EU) 2020/1784 (service of documents, recast) and Regulation (EU) 2020/1783 (taking of evidence, recast) – applicable since 1 July 2022. Although they do not themselves govern enforcement, they are frequently decisive in practice, because the due-process assessment described in Questions 13 and 14 turns on whether the originating process was properly transmitted.

Relationship with the bilateral treaties. By virtue of Articles 69 and 70 of Brussels I bis, in matters falling within its scope the Regulation supersedes the bilateral conventions concluded between Greece and other Member States (Germany, Bulgaria, Cyprus, Czechia, Slovakia, Hungary, Poland, Romania, Croatia and Slovenia). Those conventions retain residual effect only for matters outside the Regulation's scope. This is a point

frequently overlooked by foreign counsel, who occasionally invoke an inapplicable bilateral treaty and thereby import a needless exequatur requirement.

(B) Bilateral treaties

Greece has concluded and ratified the following bilateral treaties on judicial cooperation, which extend to civil and commercial judgments given by the courts of the other contracting State (listed alphabetically):

Albania — Treaty of 17.5.1993, ratified by Law 2311/1995, on civil and criminal matters.

Armenia — Treaty of 21.11.2000, ratified by Law 3007/2002, on civil, family and criminal matters.

Bulgaria — Treaty of 10.4.1976, ratified by Law 841/1978, on civil and criminal matters.

China — Treaty of 17.10.1994, ratified by Law 2358/1995, on civil and criminal matters.

Cyprus — Treaty of 5.3.1984, ratified by Law 1548/1985, on civil, family, commercial and criminal matters.

(Former) Czechoslovakia — Treaty of 22.10.1980, ratified by Law 1323/1983, on civil and criminal matters; still in force as between Greece and each of Czechia and Slovakia.

Georgia — Treaty of 10.5.1999, ratified by Law 2813/2000, on civil and criminal matters.

Germany — Treaty of 4.11.1961, ratified by Law 4305/1963, on civil and commercial matters.

Hungary — Treaty of 8.10.1979, ratified by Law 1149/1981, on civil and criminal matters.

Lebanon — Treaty of 5.4.1975, ratified by Law 1099/1980, on civil, commercial and criminal matters.

Poland — Treaty of 24.10.1979, ratified by Law 1184/1981, on civil and criminal matters.

Romania — Treaty of 19.10.1972, ratified by Law 429/1974, on civil and criminal matters.

Syria — Treaty of 2.6.1981, ratified by Law 1450/1984, on judicial cooperation in civil and criminal matters.

Tunisia — Treaty of 12.4.1993, ratified by Law 2228/1994, on civil and commercial matters.

Ukraine — Treaty of 2.7.2002, ratified by Law 3281/2004, on civil matters.

(Former) Union of Soviet Socialist Republics — Treaty of 21.5.1981, ratified by Law 1242/1982, on civil (including commercial and family) matters and on judgments relating to judicial costs. It remains in force and continues to bind Greece in its relations with the successor States that have not concluded separate instruments, namely Russia, Azerbaijan, Belarus, Kazakhstan, Moldova, Tajikistan, Turkmenistan and Uzbekistan. Georgia, Armenia and Ukraine are not included, each being bound by its own bilateral treaty with Greece, as abovementioned.

(Former) Socialist Federal Republic of Yugoslavia — Treaty of 18.6.1959, ratified by Law 4007/1959, on civil, commercial and criminal matters. It remains in force and continues to bind Greece in its relations with the successor States that have not concluded separate instruments, namely Slovenia, Croatia, Serbia, Montenegro, North Macedonia and Bosnia and Herzegovina, subject in the case of Slovenia and Croatia to the primacy of Brussels I bis.

(C) International conventions

HCCH Convention of 2 July 2019 on the Recognition and Enforcement of Foreign Judgments in Civil or Commercial Matters. The European Union acceded on 29 August 2022 pursuant to Council Decision (EU) 2022/1206 of 12 July 2022, and the Convention entered into force for the EU — and therefore for Greece — on 1 September 2023. No separate Greek ratification was required. See below Question 25 for the current list of Contracting Parties.

Lugano Convention of 30 October 2007 — governs judgments emanating from Switzerland, Norway and Iceland. Approved by the EU on 18 May 2009 and applicable in Greece since 1 January 2010. The Convention is not currently open to the United Kingdom, whose judgments are therefore assessed under the HCCH 2019 or 2005 Conventions, or under the GCCP.

HCCH Convention of 2 October 1973 on the Recognition and Enforcement of Decisions relating to Maintenance Obligations, ratified by Law 3171/2003.

HCCH Convention of 19 October 1996 on Jurisdiction, Applicable Law, Recognition, Enforcement and Co-operation in respect of Parental Responsibility and Measures for the Protection of Children, ratified by Law 4020/2011.

European Convention of 20 May 1980 on Recognition and Enforcement of Decisions concerning Custody of Children and on Restoration of Custody of Children (a Council of Europe instrument concluded at Luxembourg, not an EU

convention), ratified by Law 2104/1992. It is relevant only to decisions of non-EU States that are not party to the 1996 Hague Convention.

HCCH Convention of 25 October 1980 on the Civil Aspects of International Child Abduction, ratified by Law 2102/1992, under which return orders of abducted children are given effect in Greece.

HCCH Convention of 23 November 2007 on the International Recovery of Child Support and Other Forms of Family Maintenance, binding on Greece by virtue of its approval by the European Union.

HCCH Convention of 30 June 2005 on Choice of Court Agreements, binding on Greece by virtue of its approval by the European Union (see below Question 24).

HCCH Convention of 5 October 1961 Abolishing the Requirement of Legalisation for Foreign Public Documents (Apostille Convention), ratified by Law 1497/1984 – the instrument that in practice determines how a foreign judgment is authenticated for Greek proceedings (see below Question 7).

HCCH Convention of 15 November 1965 on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters, ratified by Law 1334/1983, and **HCCH Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters**, ratified by Law 2657/1998. Both are directly relevant to the due-process control exercised at the enforcement stage.

Convention of 19 May 1956 on the Contract for the International Carriage of Goods by Road (CMR), ratified by Law 559/1977, Article 31(3) of which provides for a simplified circulation of judgments between Contracting States.

New York Convention of 10 June 1958 on the Recognition and Enforcement of Foreign Arbitral Awards, ratified by Legislative Decree 4220/1961. Although arbitral awards fall outside the scope of this guide, the Convention is noted because Greek enforcement practice treats awards and judgments through closely related procedural routes (Articles 903, 905 §4 and 906 GCCP).

A point of classification. The UNCITRAL Model Law on Cross-Border Insolvency, enacted in Greece by Law 3858/2010, is sometimes listed among the international conventions applicable in this field. Strictly, it is not a treaty: Law 3858/2010 is domestic Greek legislation transposing a model text, and it governs the recognition of foreign insolvency proceedings falling outside Regulation (EU) 2015/848.

2. What, if any, reservations has your jurisdiction made to such treaties?

Greece's own reservations are confined to two family-law instruments. Two further sets of declarations, however, bind Greece indirectly and are of considerable practical importance: those made by the European Union on behalf of the Member States, and those made by Greece under the 1965 Service Convention.

(a) Reservations made by Greece

HCCH Convention of 2 October 1973 (maintenance obligations) – Article 26. Greece has reserved the right not to recognise or enforce decisions or settlements concerning maintenance obligations:

- between collaterals, other than brothers and sisters;
- between persons related by affinity (in-laws); and
- between spouses whose marriage has been declared void or annulled, where the decree of divorce, legal separation, nullity or annulment was given by default in a State in which the defaulting party did not have his or her habitual residence.

HCCH Convention of 19 October 1996 (parental responsibility and child protection) – Article 55(1). Greece has reserved:

- the jurisdiction of its own authorities to take measures directed to the protection of a child's property situated in Greece; and
- the right not to recognise any parental responsibility or measure that is incompatible with a measure taken by the Greek authorities, including measures taken in proceedings for provisional relief.

(b) Declarations made by the European Union that bind Greece

HCCH 2019 Judgments Convention. On accession the EU declared, under Article 27(1), that it exercises competence over all matters governed by the Convention; and, under Article 18, that it will not apply the Convention to **non-residential leases (tenancies) of immovable property situated in the European Union**. The latter declaration preserves the exclusive jurisdiction that Article 24(1) of Brussels I bis confers on the courts of the Member State where the property is located, and it means that a third-country judgment concerning the commercial lease of Greek real estate cannot be enforced in Greece.

under the Convention. Greece has not sought any additional declaration under Article 17.

HCCH 2005 Choice of Court Convention. The EU's declaration under Article 21 excludes certain insurance contracts from the Convention's scope, subject to the exceptions set out in that declaration.

(c) Declarations under the 1965 Service Convention

These are frequently decisive when the enforceability of a default judgment is contested, because they determine whether service on a Greek-domiciled defendant was validly effected in the first place. Greece:

- **objects to Article 10**, both as regards the transmission of judicial documents by postal channels and as regards direct service through bailiffs, so that the Central Authority route under Article 5 is the standard channel;
- requires, under Article 5, that documents addressed to Greece be written in or translated into Greek;
- objects, under Article 8, to service on a Greek national through the diplomatic or consular agents of the State of origin; and
- provides, under Article 12, that formal service under Article 5(1)(a) is effected through the competent Public Prosecutor against a flat fee.

Claimants who serve a Greek defendant by post and later seek to enforce the resulting default judgment in Greece regularly encounter difficulty on this ground.

3. Can foreign judgments be enforced in your jurisdiction where there is not a convention or treaty or other arrangement, e.g. under the general law?

Yes. In the absence of an applicable EU instrument, international convention or bilateral treaty, a foreign judgment may be recognised and declared enforceable under the GCCP, principally Articles 323, 780, 904 §2(c) and 905.

Recognition operates *ipso jure*. Under Article 323 GCCP a foreign judgment given in contentious proceedings produces *res judicata* effect in Greece automatically, without any prior court order, provided the statutory conditions are satisfied. A party may therefore rely on the foreign judgment as a defence, or as the basis of a claim, before any Greek court or authority, which will verify the Article 323 conditions incidentally. A declaratory action for recognition is available where a binding determination

is desired, but it is not a precondition to invoking the judgment.

Enforcement requires *exequatur*. Article 904 §2(c) GCCP includes foreign titles declared enforceable among the enforceable titles recognised in Greece. To obtain that declaration the creditor petitions the Single-Member Court of First Instance under Article 905 GCCP, following the non-contentious (voluntary jurisdiction) procedure.

Non-contentious decisions. Foreign decisions given in voluntary or *ex parte* proceedings are assessed under Article 780 GCCP, which requires that the foreign court applied the substantive law that Greek conflict-of-laws rules designate, that the foreign court had jurisdiction under those rules, and that the decision is not contrary to Greek public policy or *boni mores*.

4. What basic criteria does a foreign judgment have to satisfy before it can be enforced in your jurisdiction? Is it limited to money judgments or does it extend to other forms of relief?

(a) The statutory conditions

A distinction that is often blurred in practice, but which the GCCP draws expressly, should be noted at the outset: **recognition** under Article 323 requires that the judgment be *res judicata* in the State of origin, whereas ***exequatur*** under Article 905 §3 requires only that it be **enforceable** there. Article 905 §3 imports the conditions of Article 323 nos. 2 to 5 – not no. 1. A judgment that is provisionally enforceable but still open to appeal abroad can therefore be declared enforceable in Greece (see Question 17), even though it is not yet capable of producing *res judicata* effect.

The conditions are:

1. **Enforceability (for *exequatur*) or finality (for recognition) in the State of origin.** The judgment must be enforceable under the law of the State where it was given; for recognition under Article 323, it must have acquired *res judicata* effect there.
2. **Indirect jurisdiction.** The foreign court must have had international jurisdiction when tested against the Greek rules of jurisdiction – the “mirror-image” principle examined in Question 13 – and must not have encroached on the exclusive jurisdiction of the Greek courts.
3. **Due process.** The defeated party must not have been deprived of the right to defend itself or otherwise to participate in the proceedings,

unless the deprivation resulted from a provision applying equally to the nationals of the State of origin.

4. **No irreconcilable Greek judgment.** The foreign judgment must not conflict with a Greek judgment given in the same dispute between the same parties and having *res judicata*
5. **Consistency with Greek public policy.** Neither the content nor the effects of the judgment may be manifestly contrary to Greek public policy (*ordre public*) or to *boni mores*.
6. **Non-contentious decisions** are additionally reviewed under Article 780 GCCP.

The burden of establishing each condition rests on the applicant creditor.

(b) Types of relief

Enforcement is not confined to money judgments. Greek courts recognise and declare enforceable declaratory judgments, judgments affecting status and registral entries, and non-monetary orders such as injunctions and orders for specific performance, provided that the obligation imposed is sufficiently determinate and that a corresponding Greek enforcement mechanism exists. Orders to perform an act that cannot be performed by a third party are enforced under Article 946 GCCP by a monetary penalty and personal detention; orders to abstain from an act are enforced under Article 947 GCCP by a penalty fixed in advance for each breach. A foreign order framed in terms that cannot be mapped onto these mechanisms – an open-ended mandatory injunction, for example – may be declared enforceable in principle yet prove difficult to execute in practice, and the drafting of the operative part of the foreign judgment therefore deserves attention at the outset of the foreign litigation.

Judgments of criminal and administrative courts are excluded, save to the extent that they contain an award of civil compensation, which may be severed and enforced.

5. What is the procedure for enforcement of foreign judgments pursuant to such conventions, treaties or arrangements in your jurisdiction?

EU judgments (Brussels I bis). No exequatur is required. Under Articles 39 to 41 of the Regulation a judgment enforceable in the Member State of origin is enforceable in Greece on the same footing as a Greek judgment, and enforcement is governed by Greek procedural law. The creditor proceeds directly to the enforcement stage by producing the documents listed in Article 42 to the competent enforcement authority – in practice the bailiff

instructed to serve the order to pay.

Two features of the Regulation are of particular practical importance in Greece:

- **Article 43(1)** requires that the Annex I certificate be served on the debtor a reasonable time *before* the first enforcement measure. Greek bailiffs will ordinarily effect that service together with the order to pay, but a failure to observe the sequence is a recurrent ground of objection under Article 933 GCCP.
- **Article 43(2)** entitles a debtor domiciled in a Member State other than that of origin to request a translation of the judgment, and enforcement measures other than protective measures are suspended until the request is dealt with.

Other EU instruments. Judgments certified as a European Enforcement Order (Regulation 805/2004), European orders for payment (Regulation 1896/2006), judgments given in the European Small Claims Procedure (Regulation 861/2007) and decisions falling within Regulations 4/2009, 650/2012, 2019/1111 and 2016/1103–1104 likewise circulate without exequatur, on production of the relevant standard certificate and, where required, a Greek translation.

Conventions and bilateral treaties. Unless the instrument itself establishes a simplified route, judgments falling under an international convention or a bilateral treaty follow the ordinary Greek exequatur procedure described in Question 6, with the substantive conditions and grounds of refusal drawn from the instrument rather than from the GCCP. Under the HCCH 2019 Convention, in particular, Article 13(1) refers the procedure to the law of the requested State while Articles 5 to 7 supply the jurisdictional filters and the exhaustive grounds of refusal.

6. If applicable, what is the procedure for enforcement of foreign judgments under the general law in your jurisdiction?

Enforcement under the general law is a two-stage exercise: the creditor must first obtain a declaration of enforceability, and only then may enforcement measures be taken.

Stage one – exequatur (Article 905 GCCP). The creditor files a petition with the **Single-Member Court of First Instance**. Territorial jurisdiction lies with the court of the district in which the debtor is domiciled; failing a

domicile, of the district of the debtor's residence; and failing both, with the Single-Member Court of First Instance of Athens. The petition is heard under the non-contentious procedure of Articles 739 et seq. GCCP. Proceedings are formally *ex parte*, but the debtor may intervene under Articles 752 to 753 GCCP and routinely does so where the amounts at stake justify it. The court examines the statutory conditions of its own motion and may order the production of further evidence. Its decision takes the form of a judgment, which is subject to appeal (Question 18) and may also be revoked or varied under Article 758 GCCP on the basis of new facts or a change of circumstances.

2026 reform. Three changes affect the conduct of the *exequatur* petition. Article 741 GCCP now expressly cross-refers to Article 591 §1(c) to (f), which settles a question left open since 2015 and fixes the timetable for pleadings in voluntary jurisdiction: pleadings are filed at the hearing and the reply within five days. Article 215 §1 requires the hearing of every application to be listed within 210 days of filing, extended to nine or ten months where service abroad is required. Article 307 requires judgment in voluntary jurisdiction cases within four months of the file reaching the judge.

Stage two – enforcement. Once the declaration is final, the creditor:

1. obtains an official copy of the judgment bearing the enforcement formula (*apographo*, Article 918 GCCP);
2. serves on the debtor an order to pay or to perform (*epitagi pros ektelesi*, Article 924 GCCP), stating the sum claimed in euro;
3. waits three working days from service before taking any enforcement measure (Article 926 §1 GCCP), save in cases of urgency where the court may abridge that period; and
4. proceeds to the appropriate measure – attachment of movables, of immovables or of claims in the hands of third parties including bank accounts (Articles 953 et seq. GCCP), followed where necessary by sale at electronic auction on the national platform, all auctions having been conducted electronically since 21 February 2018.

If more than one year elapses between service of the order to pay and the enforcement measure, a fresh order must be served (Article 926 §2 GCCP).

2026 reform. Law 5221/2025 amended, among others, Articles 918 §2 and 927 GCCP, and removed the territorial restriction on the appointment of the auction official:

where no certified notary is available in the judicial district of enforcement – a recurrent bottleneck – a certified notary from any notarial association in the country may be appointed, the unavailability being established by the bailiff levying the attachment. Article 973 GCCP now requires the declaration of continuation of an auction, and the declaration of substitution by another creditor, to be served on the debtor, closing a gap under which a debtor could learn of the resumption of an auction only from an online posting.

7. What, if any, formal requirements do the courts of your jurisdiction impose upon foreign judgments before they can be enforced? For example, must the judgment be apostilled?

(a) Judgments from third States

At the hearing of the petition for a declaration of enforceability the applicant must produce:

1. the foreign judgment, or a certified copy of it, together with proof of authenticity – in practice an **apostille** under the 1961 Hague Convention where the State of origin is a Contracting Party, and consular legalisation where it is not – accompanied by a certified Greek translation;
2. a **certificate of enforceability** or equivalent document issued by the State of origin, confirming that the judgment is enforceable under the law of that State, again with a certified Greek translation; and
3. where the judgment was given in default, **proof of service** of the originating process, demonstrating that the absent party was summoned in due time and in a manner enabling it to arrange its defence.

Certified translations may be prepared by a Greek lawyer, by a notary, or by a translator entered in the register of certified translators maintained under Law 4781/2021. The former Translation Service of the Ministry of Foreign Affairs no longer performs this function.

The applicant bears the burden of proving that every condition for recognition and enforcement is met under the applicable regime, and the court may call for further documents – for example evidence of the foreign law on finality or enforceability, or documentation of the corporate authority of a foreign judgment creditor.

(b) EU judgments

The formalities are markedly lighter. **Article 61 of Brussels I bis prohibits any requirement of legalisation or equivalent formality**, so no apostille is required. The creditor produces:

1. a copy of the judgment satisfying the conditions necessary to establish its authenticity;
2. the certificate issued under Article 53 of the Regulation (Annex I), which confirms enforceability and reproduces an extract of the judgment together with, where applicable, particulars of recoverable costs and the calculation of interest; and
3. certified Greek translations, which the Greek enforcement authorities will in practice require of both documents.

8. How long does it usually take to enforce or register a foreign judgment in your jurisdiction? Is there a summary procedure available?

Two answers must now be given: the position under the previous regime, which still governs older matters, and the position under the statutory timetable introduced with effect from 1 January 2026.

Statutory timetable (applications filed on or after 1 January 2026). Article 215 §1 GCCP requires the hearing to be listed within 210 days of filing, or within nine to ten months where service abroad is required — as it will be in most exequatur cases, the respondent being a foreign judgment debtor. Article 307 GCCP requires judgment in voluntary jurisdiction proceedings within four months of the file reaching the judge. Taken together, these point to a first-instance exequatur in roughly twelve to fourteen months from filing.

Practical experience to date. Under the previous regime the hearing was typically listed three to six months after filing, with judgment three to six months later, and an appeal added a further twelve to eighteen months. Whether the new deadlines will be met is an open question: they bind the courts, and Law 5221/2025 reinforced the disciplinary consequences of non-compliance, but they depend on judicial resources rather than on drafting. Practitioners should plan on the historic timescales and treat the statutory deadlines as a target.

The enforcement stage. Service of the order to pay, attachment and, where required, electronic auction ordinarily take a further six to twelve months, depending on the asset and on whether the debtor raises objections under Article 933 GCCP. Objections have been the

principal source of delay: in the Athens Court of First Instance, hearing dates for Article 933 objections have been running into the late 2030s. Part B of Law 5221/2025 responds with a mandatory re-scheduling of pending objections through a dedicated electronic platform, on the model used for over-indebtedness applications, extended by Law 5264/2025 to objections under Articles 632 and 633. Re-scheduled objections follow a compressed timetable — notification within 30 days, pleadings and evidence within 90 days, reply within 15 days, allocation to a judge within a further 15 days, listing within 30 days thereafter, a formal hearing with no adjournment and no oral evidence, and judgment within two months — and an objection that is not re-scheduled is treated as never having been filed. The regime takes effect on publication of the implementing ministerial decision.

Judicial map. Law 5108/2024 abolished the Magistrates' Courts as from 16 September 2024, unified first-instance jurisdiction and introduced central, parallel and regional seats of the Courts of First Instance. The Single-Member Court of First Instance remains the forum for exequatur, but the geographic allocation of cases has changed and transitional adjustment is still working through the system.

Summary procedure. There is no summary or registration-based procedure for judgments of third States; exequatur is the only route. EU judgments are exempt from exequatur altogether and can be enforced within days of the creditor assembling the Article 42 documents.

9. Is it possible to obtain interim relief (e.g. an injunction to restrain disposal of assets) while the enforcement or registration procedure takes place?

Yes. Interim relief may be granted while recognition or enforcement proceedings are pending, provided the Greek courts have jurisdiction over the application and the statutory conditions are met.

Under Article 682 GCCP the applicant must establish:

1. the existence of a claim or right requiring protection or preservation, or a situation requiring provisional regulation; and
2. an urgent case or an imminent danger to be averted.

The measures most commonly deployed in support of a foreign judgment are:

- **conservatory attachment** (*syntiritiki kataschesi*, Articles 707 et seq. GCCP) over movables, immovables or claims against third parties, including bank accounts;
- **prenotation of mortgage** (*prosimiosi ypothikis*) over Greek real estate;
- **judicial sequestration** of specific assets; and
- **a provisional order** under Article 691A GCCP, which the judge may grant on the day the application is filed and which remains in force until the application is heard. In practice this is the fastest protective step available in Greece.

Where the debtor is subject to an enforceable money judgment, Article 724 GCCP permits conservatory attachment on the strength of that title without a separate provisional-measures hearing.

For EU cases, Article 35 of Brussels I bis independently confers jurisdiction on the Greek courts to order provisional and protective measures in respect of assets located in Greece, even where the courts of another Member State have jurisdiction over the substance. The European Account Preservation Order under Regulation (EU) No 655/2014 offers a further route, with the advantage of the account-information mechanism in Article 14 where the creditor cannot identify the debtor's bank.

2026 reform. Three changes are of direct interest to a foreign judgment creditor. Article 722 §1 GCCP now sets out in detail how movable or immovable property already subject to a conservatory attachment may be sold without a fresh attachment once the creditor has obtained an enforceable title. This is precisely the position of a creditor who secured assets while the exequatur petition was pending, and it removes a step that previously cost several months. Article 732A GCCP, which since 2021 had required the main action to be brought within a fixed period after an order provisionally regulating a situation, has been repealed. And under the amended Article 686 §5 GCCP an application for interim measures may be made orally at the hearing of the main case.

10. What is the limitation period for enforcing a foreign judgment in your jurisdiction?

No statutory time limit governs an application for recognition or for a declaration of enforceability as such. The relevant limitation attaches to the underlying claim.

Under Article 268 GCC, a claim established by a judgment having *res judicata* effect, or by an equivalent enforceable

title, is time-barred after **twenty years**, and this applies even where the claim was originally subject to a shorter period. Periodic future payments falling due after the judgment remain subject to their own shorter periods. Time runs from the point at which the title becomes final rather than from the date of its issue.

Two qualifications are worth noting. First, where the judgment emanates from a third State, the limitation of the underlying claim is in principle governed by the law applicable to that claim under Greek conflict-of-laws rules; Article 268 GCC is applied to the judgment debt itself. Second, at the enforcement stage Article 926 §2 GCCP imposes its own timetable: if a year passes between service of the order to pay and the taking of an enforcement measure, a fresh order must be served before enforcement can proceed.

Given that a lapse of many years may also bear on the public-policy assessment and on the availability of evidence of service, creditors are well advised not to treat the twenty-year period as an invitation to delay.

11. On what grounds can the enforcement of foreign judgments be challenged in your jurisdiction?

The grounds depend on the applicable regime.

(a) Under the GCCP (Articles 323 and 905)

1. **The judgment is not enforceable in the State of origin.** This is the threshold condition; a judgment that has been stayed or set aside abroad cannot be enforced in Greece.
2. **Manifest incompatibility with Greek public policy or *boni mores*.** Public policy here embraces fundamental constitutional, moral, social and economic values, and is assessed by reference to the effects the judgment would produce in Greece, not to the reasoning of the foreign court. Punitive damages are not *per se* contrary to public policy, provided they are not excessive (see Question 16).
3. **Absence of indirect jurisdiction.** The foreign court lacked jurisdiction when tested against Greek jurisdictional rules, or the matter fell within the exclusive jurisdiction of the Greek courts.
4. **Infringement of the right of defence.** The defeated party was deprived of the opportunity to defend itself or to participate in the proceedings, unless the deprivation flowed from a rule applying equally to nationals of the

State of origin.

5. **Conflict with a Greek judgment** having *res judicata* effect between the same parties in the same dispute.

(b) Under Brussels I bis

Because there is no exequatur, the debtor must take the initiative. An application for **refusal of enforcement** is made under Articles 46 to 51 of the Regulation to the Single-Member Court of First Instance, on the exhaustive grounds set out in Article 45: manifest contrariety to public policy; insufficient or untimely service of the originating document in a default case; irreconcilability with a judgment given in Greece, or with an earlier judgment given elsewhere and entitled to recognition here; and infringement of the protective jurisdictional rules for insurance, consumer and employment matters or of the exclusive jurisdiction rules of Article 24. Article 44 permits the Greek court, pending that application, to limit enforcement to protective measures, to make it conditional on security, or to stay it altogether.

(c) Under the HCCH 2019 Convention

Article 7 sets out an exhaustive list of grounds of refusal, materially narrower than those available under the GCCP, and Article 4(2) prohibits any review of the merits.

(d) Objections at the enforcement stage

Independently of the above, the debtor may bring objections under **Article 933 GCCP** directed at the validity of the enforceable title or of the enforcement procedure, within the time limits laid down in Article 934 GCCP. These objections are heard by the Single-Member Court of First Instance and may be coupled with an application to stay enforcement under Article 938 GCCP.

2026 reform. Articles 933, 934 and 938 GCCP were all amended by Law 5221/2025, as corrected by Law 5264/2025, with effect for orders to pay served on or after 1 January 2026:

- **Concentration of grounds.** Where the enforceable title is a payment order, objections going to its validity, and objections going to the claim itself, are inadmissible under Article 933 – unless they arose subsequently and can no longer be raised by objection against the payment order, or rest on an independent right capable of being asserted by separate action. The counterweight is a broadened right to a stay under Article 633 GCCP, which may now be sought even before the second service of the payment order. This matters to a foreign

judgment creditor who has also obtained a Greek payment order on the same debt, and it makes the choice of enforceable title a strategic decision rather than a formality.

- **Structure of the time limits.** Article 934 was recast to align with the new architecture of Article 933, distinguishing defects arising between the drawing up of the order to pay and the publication of the extract of the attachment report and the filing of the documents required under Articles 955 §2 and 995 §4, from defects in the last act of enforcement. Because these periods are short and unforgiving, the current text should be checked in every case.
- An application to stay enforcement following an appeal must now be made by separate document rather than within the appeal itself – a welcome end to the practice of filing the same pleading twice. Where the stay concerns an auction, the application must be filed at least **fifteen working days** before it, in place of the five working days previously allowed.
- **Auction formalities.** Articles 955 and 995 GCCP no longer treat every breach of the pre-auction formalities as an absolute nullity. Only the failure to draw up and publish the extract, the failure to file the prescribed documents with the auction official, and the failure to serve the extract on the pledgee (movables) or on a third-party owner or possessor and the mortgagees (immovables) annul the auction without proof of prejudice; any other breach requires the objector to show prejudice. Article 954 §4 lengthens the periods for an objection seeking correction of the reserve price to thirty working days before the auction, with judgment ten days before it.

12. Will the courts in your jurisdiction reconsider the merits of the judgment to be enforced?

No. Greek courts have no power to review the merits of a foreign judgment. The prohibition of *révision au fond* is settled under domestic law and is expressly stated in Article 52 of Brussels I bis and Article 4(2) of the HCCH 2019 Convention. The court's function is confined to verifying that the procedural and jurisdictional conditions for recognition or enforcement are satisfied.

One qualification should be recorded. The public-policy control necessarily requires the court to consider what the foreign judgment actually decides and what effects it would produce in Greece; a court assessing whether an

award of damages is excessive, for example, must look at the relationship between the sum awarded and the harm found. That exercise is not a review of the merits, and Greek courts are careful to distinguish between examining the *effects* of a judgment and re-examining the *correctness* of the foreign court's findings. The distinction respects the authority of foreign judicial decisions while preserving a narrow and clearly delimited safeguard.

13. Will the courts in your jurisdiction examine whether the foreign court had jurisdiction over the defendant? If so, what criteria will they apply to this?

(a) Judgments from third States

Yes. Where recognition or enforcement is sought under the GCCP, the Greek court examines whether the foreign court had international jurisdiction, applying **Greek** rules of jurisdiction rather than those of the State of origin. This is the **mirror-image principle**: the judge asks whether, had the same dispute been brought in Greece on the same facts, a Greek court would have had jurisdiction under Greek rules. It is irrelevant which rules the foreign court in fact applied, and irrelevant that the foreign court considered itself competent.

The criteria applied are:

1. **The general rules of the GCCP**, applied by analogy to the foreign forum — in particular the defendant's domicile or residence (Articles 22 et seq.), the place of performance of a contractual obligation (Article 33), the place where the tort occurred (Article 35), the location of immovable property (Article 29) and the forum of the branch or establishment (Article 25).
2. **Special heads of jurisdiction** for particular subject matters, including maintenance, consumer and employment disputes.
3. **Party autonomy**. A valid choice-of-court agreement satisfying Articles 42 and 43 GCCP will found the foreign court's jurisdiction for these purposes, as will submission to the foreign forum without contesting jurisdiction. Law 5221/2025 narrowed Article 43 with effect from 1 January 2026: where a branch forum is available, an exclusive jurisdiction clause in favour of the courts of the principal seat of the legal person concerned may no longer be agreed in advance of the dispute. Because the mirror-image test measures the foreign court

against the Greek rules, this restriction feeds through into the assessment of foreign judgments founded on pre-dispute jurisdiction clauses of that kind — a point of practical significance for standard-form contracts with Greek branches of foreign undertakings.

4. The exclusive jurisdiction of the Greek courts.

Where Greek law reserves exclusive jurisdiction — rights *in rem* in Greek real estate, certain matters of company law, and entries in Greek public registers — a foreign judgment in that field will not be recognised.

(b) Where an instrument applies

The domestic test is displaced:

- Under **Brussels I bis**, Article 45(3) prohibits any review of the jurisdiction of the court of origin, save for the protective rules governing insurance, consumer and individual employment contracts and the exclusive jurisdiction rules of Article 24. The public-policy ground may not be applied to jurisdiction.
- Under the **Lugano Convention**, the position is materially similar.
- Under the **HCCH 2019 Convention**, Articles 5 and 6 supply a closed list of acceptable bases of indirect jurisdiction, and Greece must confine itself to that list; Article 6 reserves exclusive treatment for judgments ruling on rights *in rem* in immovable property.

14. Do the courts in your jurisdiction impose any requirements on the way in which the defendant was served with the proceedings? Can foreign judgments in default be enforced?

Greek law does not prescribe how the originating process in the foreign proceedings should have been served. The validity of service is determined by the law of the State in which the judgment was given, and by any applicable convention or EU instrument governing the transmission of documents.

That is, however, only the starting point. Even where service was formally valid under foreign law, the Greek court will refuse recognition under Article 323 no. 3 GCCP if the defeated party was in substance deprived of the right to defend itself. The controlling question is whether the defendant received notice in a manner and at a time sufficient to enable it to arrange its defence — a standard shaped by Article 20 of the Greek Constitution and Article

6 ECHR.

Default judgments are therefore enforceable in principle, subject to the following:

- under the GCCP, the applicant must produce evidence that the defendant was duly and timely summoned, and no other ground of refusal may be present;
- under **Brussels I bis**, Article 45(1)(b) permits refusal where the originating document was not served in sufficient time and in such a way as to enable the defendant to arrange its defence, unless the defendant failed to challenge the judgment when it was possible to do so;
- under the **HCCH 2019 Convention**, Article 7(1)(a) is to similar effect and adds a ground where service in the requested State was incompatible with fundamental principles of that State concerning the service of documents.

Where the defendant was served in Greece, the declarations described in Question 2(c) are decisive: service by post or by direct instruction of a Greek bailiff, in a case governed by the 1965 Service Convention, is objected to by Greece and will not readily support a default judgment here. Within the EU, Regulation (EU) 2020/1784 governs, and Article 22 of that Regulation contains its own protection for defendants who have not entered an appearance.

The 2026 reform of service abroad. The most significant change for present purposes is the new **Article 134A GCCP**, in force since 1 January 2026, which abolishes the long-criticised domestic fiction whereby a party resident abroad could be served by delivery of the document to the Public Prosecutor. The new scheme distinguishes two situations: where a procedural act must be performed within a fixed period, service on the Public Prosecutor remains the operative date, so that the period is not lost; in every other case **actual service on the addressee abroad is what counts**. If a defendant domiciled abroad does not appear, the court must set a period for production of the certificate of service and must refrain from giving judgment until it is produced. Only exceptionally may it proceed without the certificate – where the document was transmitted in due time and by a valid channel, and six months have elapsed without the certificate being returned. The provision also requires a defendant validly served with the originating document to appoint a process agent in Greece, failing which subsequent service may validly be made on the Public Prosecutor; the defendant must be informed of that

burden in the instruction to serve. Article 134A expressly follows the pattern of Article 19 of Regulation (EU) 2020/1784 and Article 15 of the 1965 Service Convention, and reflects settled Supreme Court authority.

The reform concerns service in Greek proceedings rather than in the foreign proceedings that produced the judgment. It is nonetheless relevant to this chapter in two ways. It raises the domestic benchmark against which a Greek court, applying Article 323 no. 3 GCCP, will measure whether a defendant abroad was genuinely put in a position to defend itself; and it removes a feature of Greek procedure that had long attracted criticism abroad, which should in turn ease the circulation of Greek default judgments in other jurisdictions.

15. Do the courts in your jurisdiction have a discretion over whether or not to recognise foreign judgments?

No. Recognition and enforcement are matters of strict legal compliance rather than discretion. If the statutory conditions are met the Greek court is bound to recognise the judgment or to declare it enforceable; if any condition is not met it is bound to refuse. That obligation arises under Articles 323 and 905 GCCP and, where applicable, under the relevant EU regulation, convention or bilateral treaty.

The absence of discretion should not be confused with the absence of judgment. Several of the conditions – most obviously the public-policy control and the adequacy of the opportunity to defend – call for an evaluative assessment on the facts of the case. What the court may not do is decline recognition on grounds of expediency, comity or reciprocity once the conditions are satisfied. Greek law does not impose any requirement of reciprocity for the recognition of foreign civil and commercial judgments.

16. Are there any types of foreign judgment which cannot be enforced in your jurisdiction? For example can foreign judgments for punitive or multiple damages be enforced?

Greek law proceeds from a principle of generalised enforceability: any decision of a foreign judicial body competent under its own law to determine civil disputes – including decisions given in summary proceedings – may in principle be recognised and enforced in Greece. The exceptions are as follows.

Criminal and administrative judgments fall outside the

regime, save to the extent that they contain an award of compensation under civil law.

Judgments manifestly contrary to Greek public policy must be refused. The control extends both to substantive matters (rights or obligations irreconcilable with fundamental Greek legal or moral principles) and to procedural matters (breach of the rights of defence and of due process). It is applied restrictively and on a case-by-case basis, by reference to the effects the judgment would produce in Greece.

Punitive and multiple damages. The Supreme Court of Greece has addressed the question directly, in *AP (in Plenary Session) 17/1999* and *AP 1260/2002*, holding that:

- an award augmenting the actual loss by way of punitive damages is not *per se* contrary to Greek public policy;
- such an award is enforceable provided it is not excessive by reference to the harm actually suffered; and
- where the award is disproportionate, enforcement must be refused on public-policy grounds.

In practice the Greek courts assess proportionality rather than the label attached to the head of damages, and partial enforcement of the compensatory element is available where the punitive element alone is objectionable.

Other categories that give rise to difficulty include judgments enforcing gambling debts, judgments obtained by fraud, judgments giving effect to contractual penalties that would be reduced as excessive under Article 409 GCC, and orders that interfere with proceedings pending before the Greek courts, such as anti-suit injunctions, which sit uneasily with the right of access to a court.

Enforcement against foreign States. A practical constraint that is easily overlooked: under **Article 923 GCCP**, no enforcement may be levied against a foreign State without the prior authorisation of the Minister of Justice. The provision was upheld by the European Court of Human Rights and remains a significant obstacle where the judgment debtor is a sovereign or a State entity. Comparable protections restrict enforcement against the Greek State and against certain public-law entities.

17. Can enforcement procedures be started in

your jurisdiction if there is a pending appeal in the foreign jurisdiction?

Yes. Under Greek law the decisive question is whether the judgment is **enforceable in its State of origin**, not whether an appeal remains pending. If the law of the State of origin permits enforcement notwithstanding an appeal – whether because the judgment is provisionally enforceable or because the appeal does not have suspensive effect – the Greek court may declare it enforceable here. This follows from Article 905 §3 GCCP, which requires enforceability rather than finality (see Question 4), and is consistent with the approach of the applicable EU regulations and treaties.

Three balancing mechanisms should be noted:

- Under **Article 51 of Brussels I bis**, the Greek court may stay the proceedings on an application for refusal of enforcement if an ordinary appeal has been lodged in the Member State of origin, and Article 44 permits enforcement to be limited to protective measures or made conditional on the provision of security.
- Under **Article 4(4) of the HCCH 2019 Convention**, recognition or enforcement may be postponed or refused where the judgment is the subject of review in the State of origin or where the time limit for ordinary review has not expired; a refusal on that basis does not preclude a later application.
- Under the GCCP, the debtor may apply under **Article 938 GCCP** for a stay of enforcement pending determination of objections. Law 5221/2025 recast this remedy with effect from 1 January 2026: the application must be made by separate document, and where it concerns an auction it must be filed at least fifteen working days beforehand. In parallel, Article 912 GCCP was repealed and Article 913 restructured, so that an application to stay provisional enforceability is now always determined by the court seised of the appeal and never by the court that gave the judgment.

Where the foreign judgment is subsequently set aside on appeal, the Greek declaration of enforceability loses its foundation and may be revoked under Article 758 GCCP, and enforcement measures already taken give rise to restitutionary claims.

18. Can you appeal a decision recognising or

enforcing a foreign judgment in your jurisdiction?

Yes.

Appeal. The judgment of the Single-Member Court of First Instance recognising a foreign judgment or declaring it enforceable is subject to appeal. The time limit is **thirty days** from service of the judgment for a party domiciled in Greece, and **sixty days** for a party domiciled abroad or of unknown address (Article 518 GCCP).

Where the judgment is not served by either party, a long-stop period runs from publication. **Law 5221/2025 reduced that period from two years to one year** for judgments published on or after 1 January 2026. By express transitional provision — corrected by Law 5264/2025, the original text having omitted the appeal — the two-year period continues to apply to judgments published up to 31 December 2025 that were given in adversarial proceedings, were not served, and have not become final. This is a trap for creditors and debtors alike, and the date of publication must be checked before any assumption is made about the deadline.

Following the reform of the judicial map, the appellate forum is no longer invariably the Court of Appeal: appeals against judgments of the Single-Member Court of First Instance lie either to the Multi-Member Court of First Instance or to the Single-Member Court of Appeal, the dividing line having been raised by Law 5221/2025 from EUR 30,000 to **EUR 60,000**. Law 5221/2025 also changed the mechanics of all appellate remedies. From 1 January 2026 an appeal is filed with the court to which it is addressed rather than with the court that gave the judgment, and a hearing date is assigned on filing, in principle within five months. The period for serving the appeal is thirty days from filing and in any event thirty days before the hearing, extended to sixty days from filing and ninety days before the hearing where a party to be summoned resides abroad — the position of most foreign judgment debtors. Article 495 §5 GCCP now permits transfer, of the court's own motion, where an appeal has been filed with the functionally wrong court.

Revocation or variation. Because exequatur proceedings are non-contentious, the decision may in addition be revoked or varied under Article 758 GCCP where new facts emerge or circumstances change — most obviously where the foreign judgment is set aside in the State of origin. Law 5221/2025 also clarified, in Articles 748 and 761 to 762 GCCP, who acquires the status of party in voluntary jurisdiction proceedings and who has standing to appeal.

Cassation. The judgment on appeal is final and enforceable. The unsuccessful party may bring a cassation appeal before the Supreme Court (Areios Pagos) on the limited grounds set out in Article 559 GCCP, within thirty days of service for a party resident in Greece and ninety days for a party resident abroad (Article 564 GCCP); the long-stop period where the judgment is not served has likewise been shortened to one year. A cassation appeal does not of itself suspend enforcement; the Supreme Court may order a stay, with or without conditions, under Article 565 §2 GCCP.

Three further changes affect cassation practice from 1 January 2026: the reporting judge's summary report has been reinstated, and is required for cassation appeals filed after that date and for those heard after 16 September 2026, the former power under Article 571 GCCP to dismiss a manifestly inadmissible or unfounded appeal by order having been withdrawn; Article 566 GCCP imposes page limits on cassation pleadings; and, for a party who is a natural person, the power of attorney may now be granted by digital authorisation issued through the gov.gr portal rather than by notarial deed (Article 568 GCCP) — a practical simplification for foreign individual litigants.

EU judgments. Where the debtor has applied for refusal of enforcement under Brussels I bis, the decision on that application is appealable under Article 49, and the decision on appeal is subject to a further remedy under Article 50, in each case before the courts designated by Greece.

19. Can interest be claimed on the judgment sum in your jurisdiction? If so on what basis and at what rate?

Interest is recoverable in Greece only to the extent that it is awarded by the foreign judgment itself or arises by operation of the substantive law applied by the foreign court. Where the foreign judgment is silent and the applicable substantive law does not provide for interest *ipso jure*, the Greek court has no power to add a statutory rate of its own motion, unless the parties have agreed otherwise.

When the Greek court declares the foreign judgment enforceable, the order reproduces the interest entitlement exactly as it appears in the foreign judgment, including the rate, the starting date and any compounding. Interest then continues to accrue during the Greek enforcement process on those terms, and the accrued amount is quantified in euro in the order to pay served under Article 924 GCCP.

Two limits apply:

- **Public policy.** Where the foreign rate is manifestly excessive, enforcement of the interest element may be reduced or refused on public-policy grounds, by analogy with the approach taken to punitive damages (Question 16). Article 293 GCC, which caps the rate of contractual interest, informs that assessment without being directly applicable to a foreign judgment.
- **Costs and post-judgment sums.** Interest on enforcement costs and on sums awarded by the Greek court itself accrues at the Greek statutory rate. The rates of legal and default interest are fixed by decisions of the Monetary Policy Council of the Bank of Greece and published by it; for commercial transactions falling within Law 4152/2013, which transposed Directive 2011/7/EU on late payment, the default rate is the European Central Bank reference rate increased by eight percentage points. Because these rates change, the applicable figure should be verified at the time of enforcement.

20. Do the courts of your jurisdiction require a foreign judgment to be converted into local currency for the purposes of enforcement?

Not for the purposes of the exequatur proceedings. The foreign judgment may remain expressed in its original currency, and the Greek court simply declares the decision enforceable in Greece as it stands, including the foreign-currency sum.

Conversion becomes necessary at the enforcement stage. Under **Article 291 GCC**, where a debt is expressed in a foreign currency the creditor is entitled to payment in the domestic currency at the rate of exchange prevailing at the **place and time of payment**, not at the date of the judgment or of its recognition. In practice the euro equivalent is stated in the order to pay served under Article 924 GCCP and is recalculated at the moment of distribution of the proceeds, with the exchange-rate risk over the intervening period falling on the creditor. Where the debtor's assets consist of a foreign-currency bank account, the attachment operates on the account balance and conversion follows on payment out.

21. Can the costs of enforcement (e.g. court costs, as well as the parties' costs of instructing

lawyers and other professionals) be recovered from the judgment debtor in your jurisdiction?

The creditor must fund the enforcement in the first instance. **Article 932 GCCP** provides that the costs of enforcement are advanced by the party pursuing it. Those costs typically comprise:

- court fees and stamp duties for the exequatur petition and for enforcement applications;
- bailiff's fees for service and for enforcement measures;
- costs of service of documents, including cross-border service;
- lawyers' fees for the exequatur and enforcement proceedings; and
- translation, apostille and certification costs.

Costs advanced are recoverable from the debtor out of the proceeds of enforcement, in priority to the creditor's claim, but **only to the extent that they were necessary** for the enforcement and were incurred in the interest of all creditors participating in the distribution. Costs disputed by the debtor or by a competing creditor are determined by the enforcement court, and the Supreme Court has confirmed the necessity and common-benefit criteria in its recent case law.

Two practical qualifications. First, because exequatur proceedings under Article 905 GCCP are non-contentious and formally *ex parte*, no order for costs is ordinarily made against the debtor at that stage; where the debtor intervenes and its opposition is dismissed, the general costs rules of Articles 176 and 189 to 193 GCCP apply and a costs order becomes available. Second, recoverable lawyers' fees are assessed by reference to the statutory scales under the Code of Lawyers (Law 4194/2013) rather than to the fees actually agreed, so that full recovery of commercially negotiated fees is uncommon.

22. Are third parties allowed to fund enforcement action in your jurisdiction? If so, are there any restrictions on this and can third party funders be made liable for the costs incurred by the other side?

Greece has no dedicated legal framework governing third-party funding of litigation or enforcement, and no prohibition either.

No statutory regime. Neither the GCCP nor any other procedural statute addresses whether a third party may

finance the enforcement of a judgment. Greek law has never known the common-law doctrines of maintenance and champerty, so there is no historic prohibition to be dismantled.

Validity as a matter of contract. Funding agreements are treated as ordinary private contracts, valid under the principle of freedom of contract in Article 361 GCC, provided they do not offend general principles – in particular Article 178 GCC (contracts contrary to *boni mores*), Article 179 GCC (exploitative bargains) and the rules on usury. An economically equivalent and more familiar structure is the outright **assignment of the judgment debt** under Articles 455 et seq. GCC, which transfers the claim, and with it the standing to enforce, to the funder.

Lawyers' fee arrangements. Contingency arrangements between lawyer and client (*ergolavia dikis*) are permitted by Article 60 of the Code of Lawyers (Law 4194/2013), subject to a ceiling of 20% of the subject matter of the dispute, rising to an aggregate of 30% where more than one lawyer acts. Fee-sharing between lawyers and non-lawyers remains prohibited under the Bar rules, which constrains how a funder's return may be structured where the funder is not itself a law firm.

Adverse costs. There is no provision under which a third-party funder becomes liable for the opposing party's costs. Costs liability attaches to the named party to the proceedings – the judgment creditor. A creditor may agree contractually that the funder will indemnify it against adverse costs, but that agreement binds only the parties to it and cannot be enforced by the court directly against the funder. Nor is there any mechanism for security for costs against a funder, although under Article 169 GCCP a defendant may in certain circumstances apply for security for costs against a claimant who is not resident in the European Union.

Regulation and disclosure. There is no licensing or supervisory regime for funders in Greece, and no obligation to disclose the existence or terms of a funding arrangement to the court or to the opposing party, save in the context of representative actions under Directive (EU) 2020/1828 as transposed into Greek law.

23. What do you think will be the most significant developments in the enforcement process in your jurisdiction in the next 5 years?

The following developments appear to us the most likely to shape the enforcement of foreign judgments in Greece over the coming five years.

1. **Bedding down the 2025–2026 procedural reform.** The immediate task is absorption rather than further legislation. Laws 5221/2025 and 5264/2025 impose binding deadlines on the courts themselves, and the reform will succeed or fail on whether the system can meet them; the Ministry of Justice has already announced a further corrective package to resolve the inconsistencies that emerged on entry into force. Three strands bear on cross-border enforcement. The electronic re-scheduling of objections against enforcement, if it works, will address the single largest source of delay for foreign creditors – hearing dates that in Athens had stretched more than a decade into the future. The new Article 134A GCCP on service abroad brings Greek practice into line with Regulation (EU) 2020/1784 and the 1965 Service Convention and should improve the reception of Greek judgments in other jurisdictions. And from 1 May 2026 payment orders and orders for restitution of leased premises are issued by lawyers rather than judges: an efficient reform domestically, but one that raises an unresolved question of characterisation for cross-border purposes – whether such an instrument is a “judgment” within the meaning of Article 2(a) of Brussels I bis, an authentic instrument under Article 2(c), or neither. Practitioners seeking to enforce a Greek title abroad should expect that question to be litigated.
2. **Digitalisation, driven from Brussels as well as Athens.** Regulation (EU) 2023/2844 on the digitalisation of judicial cooperation and access to justice in cross-border civil, commercial and criminal matters will, as its provisions phase in, require electronic communication between competent authorities and give parties the right to use a decentralised IT system for applications under instruments including Brussels I bis, the EEO and the EAPO. Domestically, the Ministry of Justice continues to extend electronic filing, electronic service and the electronic auction platform. The combined effect should be materially shorter timelines, particularly for EU judgments where the exequatur stage is already absent.
3. **Consolidation of the judicial map.** The reform effected by Law 5108/2024, in force since 16 September 2024, abolished the Magistrates' Courts and unified first-instance jurisdiction.

Its intended benefit — a more rational allocation of judges and caseloads — should over time reduce the listing delays that currently dominate the exequatur timetable, once the transitional difficulties have been absorbed.

4. **The widening reach of the HCCH 2019 Convention.** The Convention's membership is expanding steadily (see Question 25). Each accession removes a category of judgments from the domestic exequatur regime and substitutes a harmonised set of indirect jurisdictional filters and a narrower, exhaustive list of refusal grounds. The accession of the United Kingdom, effective 1 July 2025, is the most commercially significant development for Greek practice since Brexit, and should restore a substantial measure of predictability to Greece–UK enforcement.
5. **A narrowing public-policy exception.** Greek courts have long applied the public-policy exception with restraint. As an increasing proportion of incoming judgments arrives through EU and Hague instruments — each of which confines public policy to manifest incompatibility and forbids its use to review jurisdiction or the merits — the practical scope for refusal will continue to contract.
6. **Third-party funding: a slower path than anticipated.** Although the European Parliament called in September 2022 for a directive on responsible private funding of litigation, and the Commission published its mapping study in March 2025, the Commission confirmed in late 2025 that it will not proceed with EU-level regulation for the time being. Any development will therefore be national. Greece has no announced legislative initiative, and the more realistic expectation is the organic growth of funded enforcement under existing contract-law principles rather than a dedicated statute. A clear domestic framework would nonetheless be welcome and would strengthen Greece's position as a venue for high-value asset recovery.
7. **Asset tracing and new asset classes.** The most acute practical obstacle in Greek enforcement is not the legal test but locating the debtor's assets. Progress on EU-wide access to asset and account registers, building on the account-information mechanism already available under the EAPO Regulation, would transform the effectiveness of enforcement here. The parallel question — how attachment

operates against crypto-assets held through Greek or foreign service providers, an area in which the GCCP offers no express guidance — is likely to require legislative or judicial attention within the period.

24. Has your country ratified the Hague Choice of Courts Convention 2005, and if so when did it (or will it) come into force? If not, do you expect it to in the foreseeable future?

Yes, through the European Union. The Convention of 30 June 2005 on Choice of Court Agreements was:

- signed by the European Union on 1 April 2009, pursuant to Council Decision 2009/397/EC;
- approved on behalf of the European Union by Council Decision 2014/887/EU of 4 December 2014 (OJ L 353, 10.12.2014); and
- brought into force for the European Union on 1 October 2015.

As Greece is a Member State, the Convention has applied in Greece since **1 October 2015**, without any further national ratification. The EU's declaration under Article 21, excluding certain insurance contracts, applies to Greece accordingly.

The Convention retains independent importance notwithstanding the entry into force of the 2019 Judgments Convention: it applies where an exclusive choice-of-court agreement designates the courts of a Contracting State, and it operates at both the jurisdictional and the enforcement stage. It is of particular practical relevance to the United Kingdom, which has been a Contracting Party in its own right since 1 January 2021, and to Mexico, Singapore, Montenegro, Albania and the other Contracting Parties. Where both the 2005 and the 2019 Conventions could apply, Article 23(1) of the 2019 Convention gives precedence to the 2005 Convention.

25. Has your country ratified the Hague Judgments Convention 2019, and if so when did it (or will it) come into force? If not, do you expect it to in the foreseeable future?

Yes, through the European Union. The Convention of 2 July 2019 on the Recognition and Enforcement of Foreign Judgments in Civil or Commercial Matters was approved on behalf of the European Union by **Council Decision (EU) 2022/1206 of 12 July 2022**, and the EU deposited its instrument of accession on **29 August 2022**. The

Convention entered into force for the European Union — and therefore directly for Greece, without separate national ratification — on **1 September 2023**. Denmark is not bound.

Contracting Parties and entry into force. As matters stand, the Convention is in force for:

Contracting Party	In force from
European Union (all Member States except Denmark), including Greece	1 September 2023
Ukraine	1 September 2023
Uruguay	1 October 2024
United Kingdom	1 July 2025
Albania	1 March 2026
Montenegro	1 March 2026
Andorra	1 June 2026

Israel, the United States, the Russian Federation, Costa Rica, North Macedonia and Kosovo have signed but not yet ratified or acceded. Andorra has made a declaration under Article 18.

The temporal rule matters. Under Article 16, the Convention applies to the recognition and enforcement of a judgment only if it had effect between the State of origin and the requested State **at the time the proceedings were**

instituted in the State of origin. For judgments of the courts of England and Wales, Scotland or Northern Ireland, therefore, the Convention is available in Greece only where the English, Scottish or Northern Irish proceedings were commenced on or after 1 July 2025. Judgments in proceedings begun before that date must still be brought through the domestic exequatur route under Article 905 GCCP.

Practical significance for Greece. The Convention establishes a harmonised set of indirect jurisdictional filters (Article 5), an exhaustive list of grounds of refusal (Article 7) and an express prohibition of review of the merits (Article 4(2)). It does not displace more favourable national law: Article 15 preserves the ability of Greek courts to recognise and enforce judgments under the GCCP where the Convention does not apply. Its principal contribution is predictability — a creditor holding a judgment from a Contracting State can now assess its enforceability in Greece against a defined and comparatively narrow list of objections, rather than against the open-textured public-policy and mirror-image analysis of the domestic regime.

This chapter states the position as at the date of submission and takes account of Laws 5221/2025 and 5264/2025, in force since 1 January 2026.

*Abbreviations used throughout: **GCCP** = Greek Code of Civil Procedure; **GCC** = Greek Civil Code; **CJEU** = Court of Justice of the European Union; **AP** = Areios Pagos (Supreme Court of Greece); **HCCH** = Hague Conference on Private International Law.*

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