

Newsletter



4 September 2026

Launch of New Electronic Platform for NPL Transactions

The Joint Ministerial Decision 131225/2026 (Government Gazette B' 5120/13.08.2026) (hereinafter the "JMD"), was published in August, to implement provisions of Greek Law 5072/2023 calling for the creation of a new electronic platform for NPL Transactions.



Key Features of the Electronic Platform

Compared to Law 5072/2023, the JMD has a narrower scope: Only NPLs need to be registered in the new platform, with such registration serving a two-fold aim: increase transparency in the Greek NPL market, and facilitate the process of assessing, negotiating and transferring NPL portfolios.

To achieve this aim, the JMD introduces various obligations for NPL sellers and servicers authorised to that end (referred to collectively as "NPL data providers" in the JMD) and for NPL purchasers ("investors" in JMD parlance). Breaching such obligations can result in administrative sanctions. The JMD also introduces optional uses of the electronic platform, enabling NPL data providers and investors to streamline the sale and purchase of NPLs.

Annexed to the JMD are a number of tables, detailing the information to be shared via the platform, the roles of the various platform users, as well as the functions of the platform, related to the handling of platform users, the offering of NPL portfolios for sale, the conduct of portfolio due diligence etc.



Obligations for NPL Data Providers and Investors

The obligations introduced by the JDM relate to the mandatory use of the electronic platform in various occasions:

- When offering an NPL portfolio for sale, NPL data providers must register such offering in the platform, by populating a designated “teaser” with financial and numerical data, types of underlying loans and security interests, days-past-due categorisations etc. The closing of a portfolio sale and its key details also need to be registered. The NPL data provider is responsible for the completeness and accuracy of all information provided.
- Similarly, every transaction related to an NPL transfer and the outcome of such transaction, i.e. whether it has been completed, cancelled or amended, need to be registered in the platform. This registration obligation involves both NPL data providers and investors and applies even if the platform is not utilised as a transaction venue (see below).
- The key details of “historic” NPL transfers, concluded in the period between 01/01/2019 and 12/08/2026 (the date the JMD was enacted), including those conducted under Greek Laws 4354/2015 and 3156/2003, also need to be registered in the platform, with NPL data providers given a May 2027 deadline to submit all such details.

Optional Uses of the Electronic Platform

Optionally, NPL data providers can use the electronic platform:

- As a transaction venue, i.e. for the sharing of information and documents with investors, the conducting of due diligence, negotiations, assessment and conclusion of the NPL transaction; and
- To conduct an electronic know-your-customer (KYC) procedure of investors, for the purposes of assessing their eligibility for participating in the process of offering an NPL portfolio.



Dr. Thomas Papadogiannis-Varouchakis
Lawyer

tpapadogiannis@saranti-partners.com

T: +302120216569

*This publication is provided for general informational purposes only
and does not constitute legal or other professional advice.*