

# Greek Compliance project

## Kick-off meeting - Minutes

9 February 2026



### Minutes and Actions

#### Meeting of the Fleet Cards Europe Greece Compliance project kick-off meeting

9 February 2026, 15:00 (CET)

<b>Location</b>	Online	
<b>Chair</b>	Antonio Chiesa, DKV	
<b>Attendance</b>	Pauline Gain, Edenred Andrei Nadzorau, E100 George Panopoulos, Lambadarios Sofia Peppas, Lambadarios Magdalini-Christina Vlachou-Vlachopoulou, Lambadarios Ramon Weistroffer, DKV	Secretariat: Aurélie Decker Peigneur, FCE
<b>Apologies</b>	Przemyslaw Bugajki, E100 Clara Daouti, Lambadarios Thomas Hölscher, DKV Constantinos Lambadarios, Lambadarios Roland Schwengebecher, Edenred	
<b>Content</b>	<ol style="list-style-type: none"> <li>1. Introduction / tour de table</li> <li>2. Review of legal memo</li> <li>3. Next steps</li> </ol>	

#### 1) Introduction / Tour de table

- The meeting opened with a round of introductions, during which all participants presented themselves and their respective companies.

#### 2) Review of legal memo

- Participants reviewed, point by point, the comments submitted by FCE on the Lambadarios legal memorandum, which were circulated on Friday afternoon.
- In relation to the mandatory B2B electronic invoicing system (myDATA platform) currently being rolled out, FCE raised concerns regarding how fleet card companies (FCCs), which are presently operating in a “grey zone,” would ensure that invoices issued to FCC customers are validated by the tax authorities. It was stressed that maintaining tax compliance represents an additional challenge that will need to be addressed within the

scope of this project. The Lambadarios team clarified that they are not tax experts and therefore strongly recommended that FCE members raise this issue with their respective tax advisers.

- With respect to Option C.2 (“*exemption from the obligation to obtain a retail trading licence*”) and the reluctance of the Greek authorities to pursue this approach, FCE noted that a similar exemption was successfully adopted in Lithuania in December 2025. Lambadarios stressed that although the preferred option, it might not be a realistic option to pursue.
- In connection with FCE’s comments on §13 of the legal brief, it was agreed that additional arguments should be developed to demonstrate that FCCs operate within a secure and well-functioning framework across the EU. In particular, emphasis should be placed on the fact that FCCs operate exclusively through licensed fuel stations and therefore do not facilitate petroleum product smuggling.
- Regarding Option C.3 (“*regulation of the activity of FCCs and provision for a specific licence*”), and specifically the requirements set out in Article 11 of Law 3054/2022, it was agreed that FCE should conduct a detailed review to determine which requirements could be met and which could not. Should Option C.3 be pursued as the preferred solution, FCE agreed that the objective would be to seek the lightest and least burdensome regulatory requirements possible. A key and overarching concern remains ensuring access to the licence without any requirement for incorporation or the establishment of a permanent physical presence in Greece.

#### Action

FCE to:

- provide Lambadarios with a summary of the new Lithuanian regulatory framework applicable to fleet card companies.
- consult internal tax experts on the potential implications of mandatory B2B electronic invoicing for FCCs and discuss these implications collectively at a later stage.

Lambadarios to:

- revise the legal memorandum in line with the comments and discussions held during the meeting.
- provide FCE with a translated version of all requirements set out in Article 11 of Law 3054/2022.

### 3) Next steps

- Participants agreed that the current status quo is not viable. Whether Option C.2 or Option C.3 should be FCE’s preferred course of action remains to be determined and will require further input from a public affairs (PA) counsellor. FCE will therefore contact the firm [V+O](#), which was recommended, as well as any additional firms that Lambadarios may suggest.

Once a PA firm has been selected and onboarded, a follow-up meeting will be convened to define the approach to be adopted.

- It was also agreed that, at a later stage, engagement with the tax authorities will be necessary once greater clarity has been achieved regarding the regulatory framework applicable to FCCs.

#### Action

FCE to contact and select a PA firm to support the project.

Lambadarios to provide FCE with contact details for any recommended PA firms.