

Synthetic Indices of Fiscal Reliability (ISA) - Applicability in relation to the REDDITI 2025 model

1 FOREWORD

The Synthetic Indices of Fiscal Reliability (hereinafter, ISA) for persons engaged in business, the arts or professions:

- verify the normality and consistency of business or professional management;
- express, on a scale of 1 to 10, the degree of fiscal reliability accorded to each taxpayer.

2 APPLICATION OF ISA

The application of ISAs presupposes the completion of a specific communication approved by the Internal Revenue Service (hereinafter, ISA forms) which:

- is an integral part of the income tax declaration, to be submitted together with the REDDITI model within the deadline;
- is compiled using specific *software* ('Your ISA 2025 CPB').

In addition to the information required by the ISA forms, further data contained in the Internal Revenue's databases are required and are made available in the taxpayer's tax drawer.

2.1 ISA MODELS

ISA forms are required to be filled in by entrepreneurs and self-employed persons who carry out as their main activity one or more of those activities for which a tax reliability index is approved. Sometimes, filling in the form is also required when an exclusion cause is operative for the tax period.

Subjects excluded from ISAs

The following table summarises the assumptions of exclusion from ISAs, effective for the tax year 2024.

Exclusions	Code to be reported in REDDITI models	Filling in the ISA Form
Start business during the tax period	1	No
Cessation activity during the tax period	2	No
Revenues (Art. 85 (1), excluding those under (c), (d) and (e) of the TUIR) or declared remuneration (Article 54(1) of the TUIR) exceeding EUR 5,164,569	3	No
Period of non-normal activity	4	No
Determination of income (business or self-employment) using flat-rate criteria	5	No
Classification in an income category other than that provided for in the framework of the accounting elements contained in the approved ISA model for the activity exercised	6	No, except in a few cases
Pursuit of two or more business activities, not covered by the same ISA, if the amount of declared revenues relating to the activities not covered by the ISA relating to the prevailing activity, including those of any complementary activities covered by the specific ISA, exceeds 30% of the total amount of revenues declared (so-called 'multi-activity')	7	Yes
Non-commercial Third Sector entities that opt for the flat-rate determination of business income pursuant to Article 80 of Legislative Decree 117/2017 (exclusion cause not yet operative)	8	No
Exclusions	Code to be reported in REDDITI models	Filling in the ISA Form

Voluntary organisations and social promotion associations applying the flat-rate scheme pursuant to of Article 86 of Legislative Decree 117/2017 (cause of exclusion not yet operational)	9	No
Social enterprises under Legislative Decree 112/2017 (exclusion cause not yet operational)	10	No
Co-operative societies, consortium societies and consortia operating exclusively for the benefit of member or associated enterprises and cooperative societies established by users non-entrepreneurs operating exclusively for of the users themselves	11	No
Co-operative societies 'taxi transport' activities - activity code 49.33.10 and 'Transportation by means of hire cars with driver' - activity code 49.33.20, as per ISA DG72U	12	No
Port Pilot Corporations engaged in ISA DG77U activities	13	No
Persons carrying on a business, trade or profession participating in a VAT group	14	Yes

Content of the model

ISA models are made up of several frameworks designed to accommodate:

- the structural data specific to the activity (e.g. panel A on employees, panel B on the premises where the activity is carried out);
- as well as the accounting data (panels F and H).

The information required in the frameworks not standardised, but varies from one index to another according to the specific characteristics of the activities to which they refer.

Companies under the simplified accounting regime (so-called 'cash regime') are also required to disclose the value of opening and closing stock.

Annex on the two-year composition agreement

For taxpayers applying the synthetic tax reliability indices, Schedule P of the CPB 2025-2026 form, in which the adherence to the two-year tax agreement for the tax periods 2025 and 2026 is expressed, may be attached to the ISA.

Panel P is divided into four dedicated sections:

- the declaration of the fulfilment of the requirements for access to the two-year agreement 2025 and 2026;
- the indication of the data required for elaboration of the proposal;
- to the amounts proposed by the Inland Revenue, for the tax 2025 and 2026, relating to income for direct tax purposes and net production value for IRAP purposes;
- acceptance of the proposal by the taxpayer.

QUADRO P	
Concordato Preventivo Biennale	Condizioni di accesso P01 Presenza dei requisiti Barrare la casella <hr/> P02 Assenza di cause d'esclusione (Dichiarazione sostitutiva ai sensi degli articoli 46 e 47 del DPR n. 445/2000) Barrare la casella P03 Presenza di eventi straordinari (Dichiarazione sostitutiva ai sensi degli articoli 46 e 47 del DPR n. 445/2000) <hr/> Dati contabili P04 Reddito rilevante ai fini del CPB ,00 P05 Valore della produzione netta IRAP rilevante ai fini del CPB ,00 <hr/> Proposta CPB P06 Reddito proposto ai fini del CPB p.i. 2025 ,00 P07 Reddito proposto ai fini del CPB p.i. 2026 ,00 P08 Valore della produzione netta IRAP proposto ai fini del CPB p.i. 2025 ,00 P09 Valore della produzione netta IRAP proposto ai fini del CPB p.i. 2026 ,00 <hr/> Accettazione proposta CPB e firma dichiarazione sostitutiva righe P02 e P03 P10 Accettazione della proposta di reddito di impresa/lavoro autonomo e del valore della produzione netta IRAP ai fini CPB per il p.i. 2025 e il p.i. 2026 in assenza di una proposta di concordato in essere per il biennio 2024-2025 e firma delle dichiarazioni sostitutive P02 e P03 FIRMA

Membership of the CPB 2025-2026 is excluded if there is a cause for exclusion from the ISAs for tax year 2024.

2.2 INFORMATION CONTAINED REVENUE AGENCY DATABASES

The application of ISAs requires additional information contained in the tax authorities' databases, which are made available in the taxpayer's tax drawer.

This includes, by way of example, data on income components (revenues, inventories, employee expenses, service expenses, etc.) and income from previous periods.

This information can be used directly through the ISA application *software*. Some it can be edited and subsequently used for the application of indices.

Data retrieval by authorised intermediaries

The intermediaries authorised to transmit declarations (e.g. accountants and CAFs) retrieve the *file* containing the additional data relevant for the purposes of the ISA and for the formulation of the income proposal in the two-year tax agreement from the Taxpayer's Taxpayer's Database according to particular procedures and on the basis of a special proxy issued by the assisted taxpayer.

2.3 ISA APPLICATION SOFTWARE

The ISA application *software* ('Your ISA 2025 CPB') indicates the taxpayer's level of reliability (varying from 1 to 10). This programme also allows the user to indicate the unreliability of information deduced from the databases made available by the Revenue Agency, by entering the data considered to be correct.

Similar to last year, the economic conditions that characterised 2024 led to introduction of corrections to the functioning of the elementary reliability and anomaly indicators that operate through the application *software*.

Two-year composition agreement

As last year, the *software* enables the calculation of the income and value of the proposed production in connection with the two-year composition agreement.

2.4 DISCLOSURE OF ADDITIONAL POSITIVE COMPONENTS IN TAX RETURNS

For tax periods in which ISAs apply, taxpayers may indicate in the

tax returns additional positive components, not shown in the accounting records, to improve its reliability profile. Such components:

- are relevant for the determination of the taxable base for IRPEF/IRES and IRAP purposes;
- result in a corresponding increase in VAT turnover.

The declaration of these higher amounts does not entail the application of penalties and interest, provided that the payment of the relevant taxes (IRPEF/IRES, IRAP and VAT) is made by the deadline and in accordance with the procedures provided for the payment of the balance of income tax.

In relation to the generality of taxpayers (natural persons, partnerships and partnerships, 'solar' IRES taxpayers who approve their balance sheet or accounts by 31.5.2025), the payment deadlines therefore expire:

- 30.6.2025, without the 0.4% surcharge;
- or 30.7.2025 (30th day after 30.6.2025), with a surcharge of 0.4%.

2.5 PENALTY PROFILES

In cases of omission of ISA forms or inaccurate or incomplete data, a penalty ranging from EUR 250.00 to EUR 2,000.00 is applicable.

The Revenue Agency, before contesting the infringement, makes the information in its possession available to the taxpayer, inviting him to make the communication of the data or to spontaneously correct the errors committed.

In cases of failure to notify, the Revenue Agency may proceed, after contradictory investigation, with an inductive assessment.

3 PREMIUM SCHEME

In relation to the different levels of tax reliability resulting from application of the ISA, also as a result of the indication of additional positive components in the tax return, the benefits summarised in the following table are recognised (Revenue Agency Order No. 176203 of 11.4.2025).

It should be noted that the operation of a cause for exclusion, even with the obligation to fill in the ISA, does not permit the application of the bonus scheme (Circ. Agenzia delle Entrate 17/2019 § 4, 16/2020 § 8.1 and 6/2021 § 1.1).

Benefit	Minimum level of reliability required
Exemption from the conformity certificate for the offsetting of credits for an amount not exceeding <ul style="list-style-type: none"> • 70,000 per year, respect of VAT; • EUR 50,000 per year, in respect of direct taxes and IRAP. 	9 (for 2024) 9 (simple average 2023 and 2024 reliability levels)
Exemption from compliance visa or provision of guarantee for VAT refunds not exceeding EUR 70,000 per year.	9 (for 2024) 9 (simple average 2023 and 2024 reliability levels)
Exemption from the conformity certificate for the offsetting of credits for an amount not exceeding <ul style="list-style-type: none"> • EUR 50,000 per year respect of VAT; • 20,000 euro per year, in respect of direct taxes and IRAP. 	8 (for 2024) 8.5 (simple average of 2023 and 2024 reliability levels)
Exemption from compliance visa or provision of guarantee for VAT refunds not exceeding EUR 50,000 per year.	8 (for 2024) 8.5 (simple average of 2023 and 2024 reliability levels)
Exclusion from the rules on non-operational companies.	9 (for 2024) 9 (simple average 2023 and 2024 reliability levels)
Benefit	Minimum level of reliability required

Exclusion of assessments based on simple presumptions.	8.5 (for 2024) 9 (simple average 2023 and 2024 reliability levels)
Anticipation by one year of time limits for the assessment of business and self-employment income.	8 (for 2024)
Exclusion of synthetic determination of total income, a provided that the total assessable income does not exceed the declared income by two-thirds.	9 (for 2024) 9 (simple average 2023 and 2024 reliability levels)

The benefits relating to the use in offsetting or refunding of VAT credits, recognised by the bonus scheme on the basis of the reliability rating for 2024 or the average of the ratings for 2023 and 2024, are expendable for credits accrued in the year 2025 (resulting from the 2026 VAT return) and in the first three quarters 2026 (resulting from the relevant TR forms), as summarised in the table below.

Exemption from compliance visa on annual declaration or on the TR form or from the performance of the guarantee	Credit type	Period of credit accrual	Maximum amount
Compensation	Annual VAT	2025	70.000 o 50,000 euro
	Interim VAT	First 3 quarters 2026	
	IRPEF/IRES/IRAP	2024	50.000 o 20,000 euro
Refunds	Annual VAT	2025	70.000 o 50,000 euro
	Interim VAT	First 3 quarters 2026	

The benefits relating to the reduction of assessment periods, the exclusion from the discipline of shell companies and exclusion/limitation from certain forms of assessment do not operate in the case of violations involving the obligation to file criminal charges for one of the offences provided for in Legislative Decree No. 231/2001.
74/2000.

Two-year composition agreement

ISA persons who enter into a two-year arrangement by completing box P of the ISA forms apply the benefits of the bonus scheme, regardless of tax reliability score.

Suspension of the contested act

In addition to those listed above, a further benefit is provided by Article 47(5) of Legislative Decree 31.12.92

No. 546, which, within the framework of the tax process, exempts taxpayers with an ISA score of at least 9 the last three tax periods from providing the guarantee for the suspension of the contested act.

4 USE OF RELIABILITY LEVEL IN THE ASSESSMENT

The level of tax reliability resulting from the application of the indices, together with the information in the Financial Reports Archive of the Tax Registry, is considered to define specific control strategies based on analyses of the risk of tax evasion.

For the purposes of defining these control strategies, the Revenue Agency takes into account a reliability level of less than or equal to 6 (provv. 10.5.2019 no. 126200).