THE WEEK IN BRIEF

News

SHARE EXCHANGES

Domestic Transactions – Contribution of Equity Interests – Updates from Legislative Decree No. 192/2024 (the so-called Legislative Decree on the "IRPEF and IRES Reform" implementing Law No. 111/2023) – Clarifications (Assonime Circular No. 10 of April 29, 2025)

Assonime Circular No. 10 of April 29, 2025, is the first in a series of contributions from the Association analyzing the changes introduced by Legislative Decree No. 192/2024. The document focuses in particular on amendments to the tax treatment of business and equity contributions.

Transfer of goodwill to the transferee company
The first issue concerns goodwill, which, due to the reform, must follow the business being contributed. According to Assonime, this change should override the position previously held by the Italian Revenue Agency (Circular No. 8/2010, § 2), not only with regard to IRES but also to IRAP.
The circular also addresses the effective date of the new rules, which apply to business contributions made from December 31, 2024 (the date the Legislative Decree No. 192/2024 comes into force). Since the change is not considered an interpretative provision, Assonime emphasizes that it cannot have retroactive effect. Nevertheless, it highlights that the legislative amendment clearly aims to resolve an interpretative uncertainty caused by the Tax Authority. Therefore, this legislative intervention can serve as a logical and systematic argument in support of an interpretation contrary to the one previously held by the Tax Administration.

Contribution of qualifying shareholdings
Regarding the contribution of qualifying shareholdings under Article 177(2-bis) of the Italian Income Tax Code (TUIR), the circular notes that the new provision, which equates contributions to single-member holding companies with those to family holding companies, implies that it is a natural and acceptable occurrence for family members of the contributor to later join the shareholding structure of the transferee company.

Contribution of qualifying shareholdings held in holding companies
A particularly detailed section of the circular is dedicated to the contribution of shareholdings in holding

companies. The new rules state that holding companies must be identified based on the criteria set out in Article 162-bis(1)(b) or (c)(1) of the TUIR.
As the regulation refers to contributions involving companies that qualify as holding companies at the time of the contribution, the question arises whether the prevalence test must be conducted based on a special interim financial statement prepared at the date of the contribution. According to Assonime, this approach would conflict with the simplification goals of the reform, as it would require additional compliance beyond what is normally required to identify a holding company. Moreover, data from an interim balance sheet would not be suitable to determine holding status, since Article 162-bis of the TUIR refers exclusively to the figures from the most recently approved annual financial statements. In line with this view, the explanatory notes clarify that "most recently approved financial statements" refers to the accounts for the last fiscal year closed before the date of the contribution, even if approved afterward.

Definition of relevant shareholdings for the prevalence test
A final point worth noting concerns how relevant shareholdings are defined for purposes of the prevalence test. Regarding indirectly held investments, Assonime suggests it is more accurate to weight them based on their share of the investee companies' book equity, rather than on the book value of the participation itself. This interpretation is based on the idea that the book value of the participation already represents a portion of the investee company's net equity. Applying the ownership percentage again for the prevalence test would result in a duplication of values, making the outcome "less meaningful." According to the circular, this interpretation would require an amendment to Article 177(2-ter) of the TUIR.

Art. 175 DPR 22.12.1986 no. 917
Art. 176 DPR 22.12.1986 no. 917
Art. 177 DPR 22.12.1986 no. 917

Il Quotidiano del Commercialista, April 30, 2025 – "Assonime Focus on Business and Equity Contributions" – Cotto – Sgattoni
Il Sole 24 Ore, April 30, 2025, p. 30 – "Equity Contributions Extended to Partnerships" – Germani A.
Eutekne Guides – Direct Taxes – "Contributions – Contribution of Equity Interests" – Sanna S.
Eutekne Guides – Direct Taxes – "Contributions – Business Contributions" – Alberti P. – Odetto G. – Sgattoni C.

DIRECT TAXES
General provisions – Deductible expenses – Superbonus – Building permit for work execution – CILA-S for Superbonus purposes – Grounds for revocation (Italian Revenue Agency Ruling No. 122 of April 29, 2025)

In Ruling No. 122 of April 29, 2025, the Italian Revenue Agency addressed errors in the “Comunicazione di Inizio Lavori Asseverata” (CILA), pursuant to Art. 119, para. 13-ter of Decree Law 34/2020, which can lead to loss of the Superbonus benefit.

In the case at hand, the taxpayer asked whether failing to complete Section “F” of the CILA-S—submitted after the building had been regularized “prior to the start of the work with a specific application submitted to the Municipality, making it compliant for urban and cadastral purposes”—would result in the forfeiture of the Superbonus under Art. 119 of DL 34/2020.

Permit requirements for Superbonus interventions
Under paragraph 13-ter of Art. 119 of DL 34/2020, the interventions referred to in Art. 119 (even if involving structural parts of buildings or facades, excluding those entailing demolition and reconstruction) "constitute extraordinary maintenance and may be carried out through a CILA (Certified Notice of Commencement of Works)."

Section “F” of the CILA-S is where the certifications required by the second sentence of paragraph 13-ter of Art. 119 of DL 34/2020 must be provided, namely, either:

- for properties completed after September 1, 1967: certification of the building permit under which the property was built or of the act that legitimized its construction; or
- certification that the building was completed before September 1, 1967.

These certifications, in the CILA-S, effectively **replace** the certification of the building's legal status that a qualified technician is otherwise required to issue when submitting standard building permits, but is **not required** to issue when filing a CILA-S under Art. 119, para. 13-ter of DL 34/2020.

For this reason, the applicant hoped that, if the legal status of the property is in fact valid and demonstrable (as in this case, where regularization was done "prior to the start of the work with a specific application submitted to the Municipality, making it compliant for urban and cadastral purposes"), the missing "substitute" certifications in the CILA-S **would not prevent access to the Superbonus**.

Grounds for Revocation of the Superbonus

For interventions eligible for the Superbonus and falling within the scope of paragraph 13-ter, Article 119 of Decree-Law 34/2020, the second sentence of the same paragraph 13-ter **limits** the grounds for loss of the tax benefit, under Article 49 of Presidential Decree 380/2001, **exclusively to the cases** expressly listed under letters a) to d).

Specifically, revocation of the Superbonus tax benefits pursuant to Article 49 of DPR 380/2001 may occur *only in the following cases*:

- failure to file the CILA (Certified Notice of Commencement of Works);
- execution of works that differ from those indicated in the submitted CILA;
- absence in the CILA of the certification of the building permit under which the property was constructed, or the act that legitimized it, or a declaration that construction was completed before September 1, 1967 (i.e., the **alternative certifications** that must be provided by completing Section "F" of the CILA-S form);
- false declarations made under paragraph 14 of Article 119 of DL 34/2020 by qualified technicians, regarding energy efficiency improvements, seismic upgrades, or the appropriateness of the related costs, all of which are prerequisites for eligibility for the Superbonus.

As a result, based on the wording of the law, the Italian Revenue Agency considers that failure to complete Section "F" of the CILA-S (as required by Article 119, paragraph 13-ter of DL 34/2020), **leads to the revocation of the Superbonus**, even when the property's legal status is verifiable and compliant.

Ordinary Tax Deductions and Capital Gains from Property Transfer

However, if all relevant conditions are met, the Italian Revenue Agency allows taxpayers to benefit from the **ordinary deductions**, after they regularize their tax position by **remedying the violation** committed.

Finally, Ruling No. 122/2025 correctly notes that, following loss of eligibility for the Superbonus (under Article 119 of DL 34/2020), the transfer of the property **does not fall under** the provision of Article 67, paragraph 1, letter **b-bis)** of the Italian Income Tax Code (TUIR)—which provides for capital gains taxation if the property is sold within ten years of the completion of the works. Rather, it may fall under **letter b)** of the same Article 67.

Italian Revenue Agency Ruling No. 122 of April 29, 2025
Il Quotidiano del Commercialista, April 30, 2025 – "Loss of Superbonus for Failure to Complete Section F of the CILA-S" – Zanetti – Zeni

TAX AUDITS AND CONTROLS

Synthetic Reliability Indexes – CPB Proposal for 2025–2026 – Developments from Ministerial Decree of April 28, 2025

Ministerial Decree of April 28, 2025 outlines the methodology used by the Italian Revenue Agency to formulate the **Biennial Preventive Settlement Proposal (CPB)** for 2025–2026, aimed at taxpayers applying the Synthetic Reliability Indexes (ISA) for the 2024 tax year.

In line with the draft corrective legislative decree (currently under review by parliamentary committees), **taxpayers under the flat-rate regime** (as per Law 190/2014) are **no longer eligible** for CPB proposals.

The decree—published in advance on the Revenue Agency's website and currently pending publication in the Official Gazette—complements previous measures, including:

- **Provision No. 172928 of April 9, 2025**, which approved the CPB 2025/2026 model;
- **Provision No. 195422 of April 24, 2025**, which defined procedures for the submission of the CPB model and the withdrawal of consent to the proposal.

Criteria for Determining the CPB Proposal

The methodology follows the same approach established for the 2024–2025 CPB in the Ministerial Decree of June 14, 2024. The proposed income and net production value are calculated using data declared by the taxpayer and information related to the application of the ISA (Synthetic Reliability Indexes), including data from previous fiscal years.

In particular, starting from the income declared for the 2024 tax period, the following steps are applied:

- assessment of each elementary ISA indicator of reliability or anomaly where full reliability was not achieved, in order to increase the taxable base;
- evaluation of the operating performance over the last three tax periods, including the current one;
- comparison with sector-specific benchmark values;
- formulation of the IRAP taxable base;
- adjustment using macroeconomic projections for the 2025 and 2026 tax years.

Using these criteria, a **proposed income level** is established that ensures the taxpayer reaches a **fiscal reliability score of 10** over the two-year agreement period.

Exceptional Events Leading to Termination of the CPB

Article 4 of the Decree confirms the applicability of the **exceptional circumstances** already listed in Article 4 of the Ministerial Decree of June 14, 2024. These events cause the agreement to lapse if they result in actual income or net production values **more than 30% lower** than those agreed upon. Such circumstances include:

- natural disasters or emergencies declared as such by authorities;
- other extraordinary events causing damage to business premises, rendering them totally or partially unusable; significant loss of inventory interrupting production; inability to access business premises; or suspension of activity due to the closure of the sole or main client affected by the same event;
- voluntary liquidation, court-ordered or administrative liquidation;
- leasing of the sole business unit;
- suspension of business activity notified to the Chamber of Commerce, or suspension of a professional activity reported to the relevant professional body or pension fund.

Reduction of the Proposal Due to Exceptional Events

The same provision already foreseen for the 2024–2025 CPB allows for a **reduction in the proposed income and net production value** for the tax period ending December 31, 2025, in the presence of the above-mentioned events (excluding business liquidation and leasing). Specifically, the following reductions apply:

- **10%**, if activity was suspended for **30 to 60 days**;
- **20%**, if suspended for **over 60 days and up to 120 days**;
- **30%**, if suspension lasted **more than 120 days**.

These exceptional events must occur during the tax period ending on December 31, 2025, and in any case **prior to acceptance of the agreement**.

When filling out the CPB 2025/2026 model, the occurrence and duration of these events must be reported in **line P03**, using **codes 1 to 3**.

Article 9, Legislative Decree No. 13 of February 12, 2024
Ministerial Decree of April 28, 2025 – Ministry of Economy and Finance
Il Quotidiano del Commercialista, April 30, 2025 – "Criteria Set for Income and Production Value Calculation in CPB 2025–2026" – Rivetti
Il Sole 24 Ore, April 30, 2025, p. 30 – "The Preventive Agreement Resumes from the 2024 ISAs" – Pegorin L., Ranocchi G.P.
Il Quotidiano del Commercialista, April 11, 2025 – "Comprehensive Biennial CPB Included in Tax Return Forms" – Girinelli – Rivetti
Il Quotidiano del Commercialista, April 25, 2025 – "Submission Rules for CPB 2025–2026 Model Approved" – Girinelli – Rivetti
Eutekne Guides – Tax Audits and Penalties – "Biennial Preventive Agreement" – Girinelli A., Rivetti P.

TAX RELATIONS SETTLEMENT

Biennial Preventive Settlement (CPB) – Legislative Decree 13/2024 – CPB 2025–2026 Model – Submission Procedures (Italian Revenue Agency Provision No. 195422 of April 24, 2025)

With Provision No. 195422 of April 24, 2025, the Italian Revenue Agency defined the **submission procedures for the CPB 2025–2026 model**, to be used to opt into the **biennial preventive settlement** for tax years 2025 and 2026.

Submission Methods

The CPB 2025–2026 model, approved by Provision No. 172928 of April 9, 2025, is to be used—similarly to the previous year—to determine the agreed taxable income and formalize the related option. According to the filing instructions and Provision No. 195422, the form may be submitted in two distinct ways:

- **Together with the income tax return**, by attaching it to the ISA form;
- **Independently**, together with only the front page of the REDDITI tax return (in this regard, both the REDDITI forms and the relevant instructions have been amended).

Independent Submission

When submitting the CPB form independently, the taxpayer must enter code "1 – Opt-in" in the new "CPB Communication" box included in the "Type of Declaration" section of the REDDITI form's front page. In this case, only the following data are required:

- taxpayer's personal information;
- taxpayer's signature;
- information regarding the electronic submission by the authorized intermediary.

Submission with the REDDITI Tax Return

Alternatively, the CPB model can be filed **together with the REDDITI and ISA forms**, bearing in mind that **the option must be formalized by September 30, 2025**, as established by the corrective legislative decree currently under review in Parliament.

Revocation

Provision No. 195422 also introduces the possibility to **revoke the previously expressed CPB 2025–2026 option**. For this purpose, the taxpayer must submit a CPB 2025–2026 form filled out **exclusively** with the following fields:

- "ISA Code"
- "Business Activity Code"
- "Type of Income"

Revocation can **only** be submitted independently, along with the front page of the 2025 REDDITI form. The taxpayer must enter code "2 – Revocation" in the "CPB Communication" box.

The revocation must be filed **no later than September 30, 2025**; any revocations submitted after this deadline will have **no legal effect**.

Italian Revenue Agency Ruling No. 109 of April 16, 2025
Il Sole 24 Ore, April 28, 2025, p. 18 – "CPB Blocked by Extraordinary Transactions" – Gavelli

EMPLOYMENT – SALARIED WORK

Individual Dismissal – Disciplinary Dismissal – Performing Other Work During Sick Leave – No Impact on Recovery – Illegitimacy – Burden of Proof (Italian Supreme Court, Ruling No. 11154 of April 28, 2025)

With Order No. 11154 of April 28, 2025, the Italian Supreme Court ruled that a worker's engagement in other activities during a period of sick leave **may have disciplinary relevance** if it violates the general duties of **loyalty and good faith**, or specific **contractual obligations of diligence and fidelity**.

This applies **even when** the activity in question—considering the nature of the illness and the employee's job duties—**does not hinder or delay** the worker's recovery or return to work in a direct or immediate way.

Case Facts

A worker filed an appeal against his dismissal for having engaged in recreational activities during a period of sick leave, which exposed him to the risk of worsening his health conditions. The Court of Appeal, confirming the first-instance ruling, declared the dismissal unlawful, considering there was a disproportion between the penalty and the disciplinary violation. Consequently, the provisions of **Article 18, paragraph 5, of Law No. 300/1970** were applied. Specifically, the court found that the worker had engaged in several activities without using any protection on the limb injured during his sick leave, which exposed him to a potential deterioration of his health condition. This was evaluated in light of medical prescriptions recommending rest and immobilization of the limb, as well as the diagnosis provided.
However, the Court of Appeal declared the dismissal unlawful, noting that the employer had failed to prove a direct aggravation of the illness due to the worker's "reckless and dangerous" behavior.

In response, the employer filed an appeal with the **Supreme Court**, arguing that the second-instance court had erred in considering the dismissal disproportionate. The employer contended that the worker's conduct

during his sick leave was harmful to his interests, regardless of whether the activities had worsened his condition.

Supreme Court's Reasoning

The judges of the Supreme Court, addressing the case, clarified that there is **no absolute prohibition** in Italian law preventing workers on sick leave from performing other activities, even on behalf of third parties. Therefore, engaging in such activities does not inherently constitute a breach of the worker's obligations. However, performing other activities during sick leave can have **disciplinary relevance** and can even justify a dismissal, especially if it violates the **duties of loyalty, good faith**, and **specific contractual obligations of diligence and fidelity** (referencing cases such as Supreme Court Rulings Nos. 15621/2001, 6047/2018, 13063/2022).

The Court emphasized that during sick leave, the worker retains **all non-performance-related duties**, particularly those related to **diligence** and **fidelity** under Articles **2104** and **2105** of the Italian Civil Code, as well as the **duties of good faith** and **fairness** under Articles **1175** and **1375** of the Civil Code.

Thus, the assessment of the **impact on recovery** of the recreational activity performed by the worker should be based on an **ex-ante evaluation**, meaning an evaluation conducted at the time the contested behavior occurred, focusing on the **potential** harm. Consequently, the **timely return to work** is not relevant for determining the potential harm caused. The worker's failure to take **precautions to ensure effective healing**, including **therapeutic measures** and **rest as prescribed by the doctor**, was the central issue in the case.

Decision

The **Supreme Court** upheld the employer's appeal.
The ruling of the Court of Appeal did not align with the principles established by the Supreme Court, as it found that the employer had indeed demonstrated the **potential** of the worker's actions to delay or hinder recovery. However, the Court of Appeal had concluded that **there was no just cause for dismissal**.

Key Legal References:

- **Article 1175 of the Civil Code**: Duty of good faith in the performance of the contract.
- **Article 1375 of the Civil Code**: Obligation of good faith in the performance and termination of contracts.
- **Article 18 of Law No. 300/1970** (Workers' Statute)
- **Article 2104 of the Civil Code**: Obligation of diligence in the performance of work.
- **Article 2105 of the Civil Code**: Duty of loyalty.
- **Article 2119 of the Civil Code**: Dismissal for just cause.

Sources:

- *Il Quotidiano del Commercialista* of April 30, 2025 – "The Activity Performed During Sick Leave Must Not Delay Recovery, Even Potentially" – Andreozzi.
- **Cass. Sez. Lavoro**, April 28, 2025, No. 11154.
- *Guide Eutekne – Lavoro*: "Individual Dismissal" – Gianola G.

SOCIAL SECURITY
IVS Contributions for Artisans and Traders - 50% Reduction of Social Security Contributions for New Registrations in 2025 - Clarifications (INPS Circular 24.4.2025 No. 83)

Article 1, paragraph 186 of Law 207/2024 provides for a reduction of social security contributions in favor of individuals who register for the first time in 2025 with one of the INPS management systems for artisans and traders. With Circular 24.4.2025 No. 83, INPS has released the first clarifications on the measure and outlined the procedures for submitting the application.

Subject Scope
The benefit is available to individual entrepreneurs (including those under the flat-rate tax regime pursuant to Law 190/2014), partners in partnerships and limited liability companies (SRLs), as well as family assistants and co-workers of the business owners.
To benefit from the reduction, these individuals must:

- Have started a business activity between January 1, 2025, and December 31, 2025, either as an individual business or as a partnership/limited liability company;
- Have registered for the first time with one of the INPS management systems for artisans or traders during the same period.
  For partners in companies, the relevant date is the first entry into the company that gives rise to the social security registration in 2025.
  For family assistants and co-workers, the business activity can start during 2025, even in already active businesses.

Objective Scope
The contribution reduction amounts to 50% of the contributions due to the above-mentioned management systems. In the absence of specific limitations, INPS confirms that this reduction applies both to minimum contributions and to those based on the percentage calculated on the total declared business income.
The reduction is applied solely to the IVS rate, while maternity contributions and, for traders, the additional rate for financing the indemnity in case of definitive business cessation without having reached the old-age pension requirements, remain fully due.

Duration
The eligible period is 36 months, to be used:

- Without interruption of contributions to one of the two social security management systems;
- Starting from the date the business activity begins or the first entry into the company in 2025.
  If the start date of the activity does not coincide with the date when the individual meets the requirements for registration with the social security management system, and provided both conditions are met in 2025, the 36-month period will begin from the date of first registration with the social security management system.
  Regarding the continuity requirement, to support new businesses, the right to maintain the contribution reduction is recognized even if the worker changes businesses or activities, changes the social security system (from artisans to traders and vice versa), or temporarily ceases the business activity. Likewise, the benefit remains if there are changes in the personal status that do not result in cancellation from one of the two social security systems.
  A break in the continuity of contribution coverage results in the loss of the right to the contribution reduction if a subsequent new registration occurs in the special management systems. For example, a trader who starts a business in March 2025 and closes it in February 2027; if they start a new business in March 2027, they can keep the reduction because there is a contribution obligation for both February and March 2027. However, if the new business starts in April 2027, the benefit will be lost because the continuity is interrupted, with no coverage for March 2027.

Alternative with Other Benefits
The reduction under Law 207/2024 is available as an alternative to other measures providing rate reductions, such as the 35% reduction under Law 190/2014 for flat-rate taxpayers.
It is clarified that if the flat-rate reduction was requested before the publication of the circular, it is still possible to apply for the higher 50% reduction; this results in the revocation of the previous benefit from the

date of first registration with the social security management system. After the 50% reduction period ends, the reduction under Law 190/2014 can be requested again.

Accrediting Social Security Contributions
For the crediting of contributions, the provisions of Article 2, paragraph 29 of Law 335/95 apply, which refers to the INPS Separate Management. Under this rule, payment of an amount equal to the contribution calculated (with the rates set for artisans and traders) on the minimum income threshold grants the right to credit all monthly contributions for each year. If a contribution less than the minimum required is paid, the credited months will be proportionally reduced. For example, if an individual is required to contribute only within the minimum income threshold, and pays a contribution calculated at 50% of the contribution due on the minimum income threshold with the regular rate, they will receive 6 months of pension credit.

Application Submission
The application must be submitted by the business owner through the "Portal of Benefits (formerly DiResCo)" by completing the relevant form, the release of which will be communicated via a specific message. Through the same portal, applicants can check the status of their request.

Legal References:

- Article 1, paragraph 186, Law 30.12.2024 No. 207
- INPS Circular 24.4.2025 No. 83
- *Il Quotidiano del Commercialista* of 25.4.2025 - "50% Contributions for First Registrations in 2025 with Artisans and Traders Managements" - Rivetti
- Eutekne Guides - Social Security - "Tax Regimes and Fiscal Systems - Flat-Rate Regime for Self-Employed (Law 190/2014)" - Rivetti P.
- Eutekne Guides - Direct Taxes - "Contributions for Artisans and Traders" - Rivetti P.

MINISTRY OF ENTERPRISES AND MADE IN ITALY DECREE 28.10.2024
INDUSTRIAL PROPERTY
INTANGIBLE ASSETS - TRADEMARK - Protection of trademarks of particular national interest and value - Additional implementing provisions

In implementation of Article 7 of Law 27.12.2023 No. 206, the Ministerial Decree of 3.7.2024 established the criteria and procedures for the Ministry of Enterprises and Made in Italy to take over the ownership and subsequent use of trademarks of particular national interest and value, in order to ensure their protection and prevent their extinction, safeguarding their continuity.
With this decree, additional implementing provisions are established for the protection of the aforementioned trademarks.

Definition of "Trademark of Particular National Interest and Value"
For the purposes of this measure, a “trademark of particular national interest and value” is defined as a trademark:

- Registered for at least 50 years or, if unregistered, with evidence of continuous use for over 50 years;
- With significant notoriety;
- That is or has been used for the commercialization of products or services produced by a national company of excellence linked to the national territory.

Transfer of Ownership of the Trademark
The enterprise that holds or licenses a trademark registered for at least 50 years, or a trademark not registered but in continuous use for at least 50 years, which intends to permanently cease the production of the product identified by that trademark, must notify the cessation project:

- To the Directorate General for Industrial Policy, Industrial Conversion and Crisis, Innovation, SMEs, and Made in Italy of the Ministry of Enterprises and Made in Italy;

- At least six months before the actual cessation. The cessation project must be:
  - Prepared using the format in Annex 1 of this decree;
  - Sent to the aforementioned Directorate General via certified email to the address DGIND@pec.mimit.gov.it.
    The Directorate General, within three months of receiving the project, will notify the enterprise, at the same PEC address:
- The outcome of the investigation to verify the existence of the trademark's requirements, in relation to its particular national interest and value;
- Whether or not it intends to take over the ownership of the trademark, if it has not or will not be sold for a fee before the cessation of the activity.
  If the Directorate General expresses interest in taking over the trademark ownership, it will immediately begin the process with the company to prepare the deed of free transfer of the trademark to the Ministry of Enterprises and Made in Italy.

If there is no response from the Directorate General within the aforementioned three-month period, this is considered a declaration of no interest in taking over the trademark.

Use of Trademarks Owned by the Ministry of Enterprises and Made in Italy
Any national or foreign enterprise intending to invest in Italy or relocate its overseas production activities to Italy, and interested in using one or more trademarks owned by the Ministry of Enterprises and Made in Italy, may submit a request:

- To the Mission Unit for Investment Attraction and Unlocking (UMASI) of the Ministry, indicating the information related to the investment project, particularly concerning employment impacts;
- Using the format in Annex 2 of this decree;
- Sending it via certified email to the address umasi@pec.mise.gov.it.
  Following the request, the trademark will be made available to the enterprise through a free license agreement for a period of no less than ten years, renewable.

Termination of the Free License to Use the Trademark
The license agreement will automatically terminate, even before the expiration date, if the enterprise ceases its activity or relocates its production facilities outside the national territory.
For these purposes, the licensed enterprise is required to send a semi-annual report on compliance with these conditions:

- To the "General Affairs Office, Business Support Office" of UMASI;
- Via certified email to umasi@pec.mise.gov.it.
  UMASI may also carry out on-site checks at the licensed enterprise's facilities within the national territory.