1	**CARS GRANTED IN MIXED USE TO EMPLOYEES - DETERMINATION OF THE *FRINGE BENEFIT* - CLARIFICATIONS**
	With Circular 3.7.2025 no. 10, the Italian Revenue Agency has provided guidance on the new rules for the determination of the *fringe benefit* relating to cars granted in mixed use to employees pursuant to Article 51 paragraph 4 letter a) of the TUIR, in the light of the amendments made by Article 1 paragraph 48 of Law no. 207/2024 and by Article 6 paragraph *2-bis* of Law Decree no. 19/2025 (which introduced paragraph *48-bis* in the above mentioned Article 1 of Law no. 207/2024). These indications have been reiterated in the answer to interpello Agenzia delle Entrate 22.7.2025 no. 192.
1.1	**NEW DISCIPLINE** Article 51 co. 4 lett. a) of the TUIR, as amended by Article 1 co. 48 of Law 207/2024, provides that for newly registered motor vehicles, motorbikes and mopeds, granted in mixed use with contracts entered into from 1.1.2025, 50% of the amount corresponding to a conventional mileage of 15,000 kilometres is assumed, calculated on the basis of the cost per kilometre of operation inferable from the tables drawn up by ACI, net of any sums withheld from the employee. This percentage is reduced to: • 10% for battery-powered vehicles with exclusively electric drive; • 20% for *plug-in* hybrid electric vehicles. The Inland Revenue has clarified that the new discipline, based on the type of car's fuel supply, applies to vehicles that jointly meet the following requirements • they are registered as from 1.1.2025 • they are granted in mixed use to employees with contracts concluded as from 1.1.2025; • they are assigned (i.e. handed over) to employees as from 1.1.2025.
1.2	**TRANSITIONAL RULES** A transitional discipline is provided on the basis of which the *fringe benefit* deter-mination method in force as at 31.12.2024 remains unchanged with reference to the vehicles granted in mixed use from 1.7.2020 to 31.12.2024 and to the vehicles ordered by the employers by 31.12.2024 and granted in mixed use from 1.1.2025 to 30.6.2025 (Article 1 co. *48-bis* of Law no. 207/2024). The Revenue Agency has clarified that the regime previously in force, under the transitional rules, applies • to vehicles registered, subject to mixed-use concession contracts and delivered to the employee from 1.7.2020 to 31.12.2024, until the natural expiration of such contracts; • if the vehicle has been ordered by the employer by 31.12.2024 and has been delivered to the employee between 1.1.2025 and 30.6.2025, it being understood that in the period between 1.7.2020 and 30.6.2025 the further requirements for registration and conclusion of the contract must also be fulfilled. If the requirements for registration, conclusion of the contract and delivery of the vehicle are all fulfilled in 2025, it is possible to apply the new rules where more favourable.
1.3	**NORMAL VALUE CRITERION** In cases where neither the new nor the old rules apply, the *fringe benefit* is determined using the normal value criterion, net of business use. For example, the *fringe benefit* taxation criterion based on 'normal value' applies in the case of vehicles ordered by 31.12.2024, granted in

	mixed use to employees with contracts concluded in 2024, registered in 2025 and delivered to the employee in July 2025.
1.4	**CONTRACT EXTENSION** With regard to the hypothesis of the extension of the contract of concession for mixed use, the Inland Revenue has clarified that the tax rules relating to the time of the signing of the original contract remain applicable, until the expiry of the extension, provided that the regulatory requirements are met at the date of signing.
1.5	**VEHICLE REASSIGNMENT** In the event of reassignment of the vehicle to another employee, the Inland Revenue has clarified that the applicable tax rules must be identified on the basis of the provisions in force at the time of the reassignment.
2	**COMPANIES' FAILURE TO TAKE OUT A CATASTROPHE POLICY - PRECLUSION FROM BENEFITS**
	On 25.7.2025, the Ministry of Enterprise and *Made in Italy* published on its institutional website (www.mimit.gov.it) the Ministerial Decree 18.6.2025, which adjusts the regulations on incentives falling within the competence of the General Directorate for Incentives to Enterprises of the Ministry to the regulations on the obligation for enterprises to take out catastrophe policies. Companies required to take out catastrophe policies that have not complied with the law will therefore not be able to access the measures identified in the Ministerial Decree.
2.1	**SYSTEM OF SANCTIONS** If a company required to take out a catastrophe policy pursuant to Article 1, paragraphs 101 et seq. of Law 213/2023 fails to comply, the breach "*must be taken into account in the allocation of contributions, subsidies or financial facilities from public resources, also with reference to those provided for during calamitous and catastrophic events*" (Article 1, paragraph 102 of Law 213/2023). In an FAQ of 14.4.2025, the Ministry of Enterprises and *Made in Italy* had clarified that the rule is not self-applicative, therefore it is the individual Administration in charge of support and facilitation measures that must implement the provision, defining the modalities by which it intends to take into account the non-fulfilment of the insurance obligation in relation to its own measures, "*consistently with the timing set forth in Article 1 of Decree-Law No. 39 of 31 March 2025*". The Ministerial Decree of 18.6.2025 thus implements the provision of Article 1 para. 102 of Law 213/2023, in in relation to subsidies falling within the remit of the Directorate General for Business Incentives of the Ministry of Enterprise and *Made in Italy*.
2.2	**LIST OF INELIGIBLE MEASURES** The measures falling within the competence of the Directorate General for Incentives to Enterprises of the Ministry of Enterprise and of *Made in Italy*, for access to which it is necessary to have taken out the catastrophe policy are the following • "Development Contracts" (art. 43 of DL 25.6.2008 no. 112 and DM 9.12.2014); • "Requalification interventions intended for industrial crisis areas pursuant to Law 181/89" (Ministerial Decree 24.3.2022); • "Aid scheme aimed at promoting the birth and development of small and medium-sized co-operative companies (Nuova Marcora)" (DM 4.1.2021 and DM 30.7.2025); • "Support for the birth and development of innovative start-ups throughout the country (*Smart & Start*)" (DM 24.9.2014); • "Facilities to support research and development projects for the reconversion of production processes within the circular economy" (Ministerial Decree 11.6.2020); • 'Fund to safeguard employment levels and the continuation of business activity' (Ministerial Decree 29.10.2020); • "Mini development contracts' (Ministerial Decree 12.8.2024);

followed by	• "Facilitations to enterprises for the dissemination and strengthening of the social economy" (Ministerial Decree 3.7.2015); • "Support for self-production of energy from renewable sources in SMEs" (DM 13.11.2024); • "Financing of *start-ups*" (DM 11.3.2022); • 'Support for *start-ups* and *venture capital* active in the ecological transition' (DM 3.3.2022). These are the only measures falling within the competence of the Directorate General for Incentives to Enterprises of the Ministry of Enterprise and *Made in Italy*; for a complete indication of the measures to which access is precluded in the event of failure to take out the catastrophe policy, one must wait for the corresponding measures of the other administrations. other administrations.
2.3	**OPERABILITY OF THE EXCLUSION FROM THE INCENTIVES** The provisions contained in the Ministerial Decree of 18.6.2025 apply to applications for incentives submitted after the dates by which companies are required to comply with the obligation to take out the catastrophic insurance policy and, in any case, after the publication of the decree itself (which occurred on 25.7.2025). Please note that, based on the aforementioned Decree-Law no. 39/2025, conv. L. 78/2025, the deadlines for complying with the insurance obligation are as follows • 31.3.2025 for large companies, with application of penalties from 30.6.2025; • 1.10.2025 for medium-sized enterprises; • 31.12.2025 for small and micro enterprises. For fishing and aquaculture enterprises, the deadline is set at 31.12.2025 (art. 19 co. *1-quater* of Decree-Law 202/2024, conv. L. 15/2025).
3	**APPLICATION OF ISA FOR TAX YEAR 2024 - CLARIFICATIONS**
	With Circular 18.7.2025 No. 11, the Italian Revenue Agency summarises the most interesting aspects in relation to the application of the ISA for the 2024 tax period (REDDITI 2025 forms), outlining an application framework similar to that of the previous tax period. In fact, the 'pre-calculated' variables and the related methods of acquisition from the Tax File, the structure of the reporting of the relevant data and the application *software*, as well as the conditions for taking advantage of the benefits of the bonus scheme are confirmed ISA and the cyclical corrective measures.
3.1	**FILLING IN THE ISA MODEL ALSO FOR STP AND COMPANIES BETWEEN LAWYERS** For the tax year 2024, the cases in which, in the face of a cause for exclusion, it is still necessary to complete and transmit the ISA model for statistical purposes have been supplemented. The obligation affects certain ISAs relating to professional activities that are carried out in the form of a business by professional partnerships (STP) and companies between lawyers.
3.2	**ACQUISITION OF PRE-CALCULATED ISAS DURING THE TWO-YEAR COMPOSITION AGREEMENT** With regard to the ISA precalculations, the necessity of their prior importation into the ISA compilation *software* is reiterated. Only in the presence of exclusion causes with compulsory compilation of the model (e.g. multi-activity enterprises), the taxpayer may exempt himself from the acquisition of these variables. An exception to this are entities that have entered into the 2024-2025 two-year composition with creditors for which, even though the exclusion from the application of ISAs and the obligation to only submit the model is relevant, it is still necessary to proceed with the acquisition of the pre-calculated data, in order to allow the correct construction of the ISAs that will be applied in subsequent years and the CPB methodology.
4	**COMMUNICATIONS OF ANOMALIES FOR ISA PURPOSES FOR THE THREE-YEAR PERIOD 2021-2023**

	Revenue Agency Provision No. 305720 of 24.7.2025 approved various types of
	anomalies in the data declared for ISA purposes for the three-year period 2021-2023.

4.1	**TYPES OF ANOMALIES** In relation to the three-year period considered, the measure identifies 24 types of anomalies in the data declared for the purposes of ISA which concern, among other things, the anomalous indication of the causes of exclusion, the omission of correspondence with the data emerging from the Single Certifications single certifications, inconsistencies in inventory management.
4.2	**FORWARDING TO THE TAX DRAWER** Notifications are made available in the taxpayer's tax drawer, which can also be accessed by delegated intermediaries.
4.3	**CLARIFICATION BY MEANS OF THE APPROPRIATE *SOFTWARE*** If a communication has been received, it is possible and preferable to provide clarifications and clarifications using the *software* made available by the Revenue Agency "Anomalies 2025 compilation software".
4.4	**REGULARISATION** If the anomaly is considered well-founded, the errors and omissions may be regularised by submitting a supplementary declaration, including the corrected communication of the relevant data, resorting to the 'ravvedimento operoso' (Article 13 of Legislative Decree 472/97) for the reduction of penalties, in proportion to the time elapsed since the violation was committed. violation.
5	**FAILURE TO FILE THE VAT RETURN FOR 2024 OR FAILURE TO COMPLETE FORMS VE AND VJ - ANOMALY NOTICES**
	With Revenue Agency prov. no. 280268 of 3.7.2025, the procedures have been identified through which the taxpayer and the Guardia di Finanza (Finance Police) are to be provided with information indicating • the possible non-submission of the VAT return for the 2024 tax period (VAT Form 2025) • or the submission of the same without completing Schedule VE, or with active transactions declared for an amount of less than €1,000 • or the submission of the same without filling in Section VJ, in connection with the reporting obligations of the transferee/buyer related to the *reverse charge* regime. For these purposes, the Inland Revenue uses the data of electronic invoices issued and received, as well as those of the daily receipts stored and transmitted telematically by taxpayers liable to VAT.
5.1	**CONTENT OF THE COMMUNICATION** The communication is sent to the digital domicile of the taxpayer and contains the following information • tax code and name (or surname and first name, in the case of a natural person) of the taxpayer; • identification number and date of the communication, deed code and tax period; • date and telematic protocol of the VAT return transmitted for the tax period 2024; • date of processing of the communication, in the event of failure to submit the VAT return by the prescribed deadline; • the manner in which the taxpayer may request information or notify the Agen- Revenue Agency any elements, facts and circumstances not known to it;

	• the way in which the taxpayer may regularise errors or omissions and benefit from the reduction of the relevant penalties by means of the voluntary tax amnesty.

5.2	**MODALITIES FOR MAKING NOTIFICATIONS** The above communications are: • transmitted to the taxpayer at the certified electronic mail (PEC) address provided by the same; • consultable, by the taxpayer himself, within the reserved area of the computer portal of the Revenue Agency called "Cassetto fiscale" and the *web* interface "Fatture e Corrispettivi".
5.3	**REQUEST FOR INFORMATION AND REGULARISATION** In response to the communication, the taxpayer may: • request information or report to the Revenue Agency elements, facts and circumstances not known to the Revenue Agency, in the manner indicated in the notice sent, capable of justifying the alleged anomaly detected • regularise the errors or omissions committed in relation to the VAT return for the 2024 tax year, benefiting from the reduction in administrative penalties provided for by the discipline of the "ravvedimento operoso", pursuant to Article 13 of Legislative Decree 472/97, as amended by Legislative Decree no. 87 of 14.6.2024 (concerning violations committed from 1.9.2024).
6	**PREVENTIVE CHECKS ON 730/2025 FORMS WITH REFUNDS - APPROVAL OF CRITERIA FOR IDENTIFYING INCONSISTENCIES**
	With prov. 1.7.2025 no. 277593, the Inland Revenue Agency approved the criteria to identify the elements of inconsistency to be used to carry out the preventive checks of the 730/2025 forms that result in a refund to the taxpayer, confirming what had already been provided for in relation to the 730/2017, 730/2018, 730/2019 forms, 730/2020, 730/2021, 730/2022, 730/2023 e 730/2024.
6.1	**HYPOTHESES INVOLVING PRIOR CHECKS ON THE 730 MODELS** Pursuant to Article 5 co. *3-bis* of Legislative Decree No. 175/2014, in fact, the Inland Revenue Agency may carry out preventive controls in the event the taxpayer submits the Form 730 directly, or through the tax withholding agent providing tax assistance, with changes with respect to the pre-filed return which affect the determination of income or tax and which • present elements of inconsistency with respect to particular criteria, determined by order of the same Agency • or result in a refund in excess of €4,000.
6.2	**CRITERIA FOR DETERMINING THE ELEMENTS OF INCONSISTENCY** With prov. no. 277593 of 1.7.2025, the Revenue Agency has therefore determined the criteria to be used to identify the above-mentioned elements of inconsistency, establishing that it is necessary to identify • the deviation by significant amounts of the data resulting from the payment forms, the Single Certifications, and the declarations of the previous year • or the presence of other elements of significant inconsistency with respect to the data submitted by external bodies or those set out in the Single Certificates. The presence of risk situations identified on the basis of irregularities occurred in previous years shall also be considered as an element of inconsistency in the 730/2025 tax returns with refund results.
6.3	**PERFORMANCE OF THE CONTROL ACTIVITY** The aforesaid preventive control activity may be carried out automatically or by checking the supporting documentation, within 4 months from the deadline for the

	transmission of the 730/2025 form, or from the date of transmission, if this is after this deadline. In any case, the controls provided for in respect of income tax remain unaffected.
6.4	**DISBURSEMENT OF THE REFUND TO THE TAXPAYER** At the end of the preventive control operations, the Revenue Agency disburses the refund to which the taxpayer is entitled no later than the sixth month following the deadline for the transmission of the 730/2025 form, or from the date of transmission, if this is after that deadline.
6.5	**730 FORMS SUBMITTED THROUGH CAF AND PROFESSIONALS** Pursuant to Article 1 para. 4 of Legislative Decree 175/2014, the aforesaid rules on prior con-trols shall also apply in relation to the 730/2025 forms submitted • through CAFs and qualified professionals providing tax assistance; • regardless of whether it is a pre-filled declaration (modified or not) or a declaration submitted in the ordinary way. ***730 forms with INPS as tax substitute*** For the purposes of the preventive controls under consideration, the above procedures also apply to 730/2025 forms submitted to a CAF or professional with INPS as withholding agent.
6.6	**EFFECTS FOR THE PURPOSES OF ADJUSTMENTS** If the 730/2025 model has been included in the preventive controls • the Revenue Agency does not make the accounting result available for the purpose of making adjustments (Form 730-4) and informs the person who provided tax assistance (professional, CAF or withholding agent) or the taxpayer in case of direct submission; • the taxpayer must independently make the payment of the second or single advance payment relating to IRPEF and/or to the dry coupon tax on leases, by 1.12.2025 (as 30.11.2025 falls on a Sunday), using the F24 form (see Circ. Agenzia delle Entrate 12.3.2018 no. 4, § 7).
7	**PROFESSIONAL PRACTICE MANAGEMENT EXPENSES - CHARGEBACK OF COMMON PRACTICE EXPENSES - VAT TAXABILITY**
	In its answer to Interpretation No. 189 of 14.7.2025, the Revenue Agency clarified that the recharging of the common expenses of a law firm, not constituted as a professional association, constitutes a taxable amount for VAT purposes even where such expenses have been analytically reconstructed in a court order.
7.1	**DETERMINATION OF EXPENSES ON AN ANALYTICAL BASIS** Following a dispute concerning the assessment of the common expenses of a law firm that had to be apportioned, an expert witness was requested by the court hearing the case in order to determine the share of those expenses owed by the individual profes-sionals and due to the lawyer who had incurred them. The court-appointed expert produced a reconstruction of the charges, '*subdividing them by year and by category*', thus making it possible to determine the amount owed by the applicant.
7.2	**TREATMENT FOR VAT PURPOSES** According to the unsuccessful lawyer, the re-charging of the costs should have been traced back to a series of services rendered in the context of a mandate without representation, also because of the analytical determination of the amount due. In this sense, again according to the losing lawyer, the chargeback should have retained the characteristics of the main transaction and, thus, the same taxation regime. The interpretation of the Revenue Agency is different, which, recalling the principle contained in Circular 18.6.2001 No. 58 (§ 2.3), points out that the chargeback, in the case of

follows	case, must be subject to VAT, regardless of the fact that the amount due was determined by the court-appointed expert on an analytical basis. In fact, the agreements between the professionals provided for an allocation of costs on a lump-sum basis. The sums owed by the petitioner must therefore be subject to VAT, with the exception of the legal fees, which, by reason of their compensatory nature (being claimed in respect of the late payment of common expenses), are, on the other hand, excluded from tax pursuant to Article 15 of Presidential Decree 633/72. VAT may be deducted to the extent that the purchases are inherent to the economic activity.
7.3	**REIMBURSEMENT OF LEGAL FEES TO THE PREVAILING PARTY** A further issue analysed in reply 189/2025 concerns the reimbursement of VAT relating to the lawyer's services, payable by the losing party and established by the court. The Revenue Agency recalls that the winner of the case who is a taxable person may exercise the right to deduct the tax on his lawyer's services if '*the dispute is inherent to the exercise of his activity*'. For this reason, the aforesaid lawyer may request from the losing party only "*the amount due by way of fees and court costs and not also that of VAT, since this tax is payable by way of recourse by his client*" (see also Ministerial Ruling No. 91/E. 24.7.98 No. 91/E).
8	**SUBSTITUTE TAX ON TIPS - WORKERS IN ACCOMMODATION AND FOOD AND BEVERAGE ESTABLISHMENTS - FURTHER CLARIFICATION**
	With legal advice 15.7.2025 no. 7, the Agenzia delle Entrate provided further clarifications on the scope of application of the 5% substitute tax on tips received by employees of accommodation facilities and food and beverage establishments, introduced by art. 1 co. 58 - 62 of L. 197/2022 (Budget Law 2023) and amended by art. 1 co. 520 of L. 207/2024 (Budget Law 2025) as from from 1.1.2025.
8.1	**GENERAL RULES ON THE SUBSTITUTE TAX** According to the provisions of the Budget Law 2023, as amended by the Budget Law 2025, in accommodation establishments and food and beverage establishments, the sums allocated by customers to workers by way of tips, including through electronic means of payment, paid to workers constitute income from employment and, unless expressly waived in writing by the employee, are subject to a substitute tax on IRPEF (including regional and municipal surcharges) at the rate of 5%, within the limit of 30% of the income received in the year for the relevant services. The aforementioned provisions apply with exclusive reference to the private sector and for holders of employment income not exceeding EUR 75,000 in the tax period preceding that in which the gratuities are received.
8.2	**APPLICATION OF THE SUBSTITUTE TAX ALSO TO 'OUTSIDE' WORKERS** In Legal Advice 7/2025, the Agenzia delle Entrate points out that from the tenor of Article 1 co. 58 of Law 197/2022 it can be assumed that the substitute tax applies indiscriminately • both to workers directly employed by accommodation facilities and food and beverage service establishments • as well as to those employed by external suppliers, as in the case of workers from supply agencies, employed at the aforementioned establishments.
8.3	**OBLIGATIONS IN THE CASE OF AGENCY WORKERS** With reference to administered workers, the Revenue Agency points out that the

follows	The party required to pay the remuneration, including any tips, is the staff leasing agency, on which, consequently, fall the obligations of substitution of tax, and these obligations remain even if the tips, intended for the worker, are collected by the user establishment or restaurant, which provides for their payment to the worker. In the latter case, a system of communications must therefore be adopted between the staff leasing agency (withholding agent) and the user establishment (third-party payer), in order to correctly tax the sums paid, as well as the transmission of the sums, withheld by way of substitute tax by the user establishment, to the staff leasing agency itself, which, as withholding agent, is the taxpayer. obliged to make the relevant payment.
9	**WITHHOLDING TAX ON BONUSES FOR SPORTS WORKERS - CLARIFICATIONS**
	With legal advice 15.7.2025 no. 9, the Agenzia delle Entrate provided indications on the application of the 20% withholding tax referred to in Article 36 co. *6-quater* of DLgs. 36/2021, to be applied on the sums paid to its own members, as athletes and technicians in the amateurism area, as a prize for the results obtained in sporting competitions, also by way of participation in rallies, as members of national discipline teams in national or international events, by CONI, the Italian Paralympic Committee (CIP), the National Sports Federations, the Associated Sports Disciplines, the Sports Promotion Bodies, the amateur sports associations and clubs.
9.1	**AWARDS TO ATHLETES AND TECHNICIANS OUTSIDE A SPORTING EMPLOYMENT RELATIONSHIP** Article 36 par. *6-quater* of Legislative Decree 36/2021 applies when the subject of the sports organisation pays the bonus to athletes or coaches with whom there is no sporting employment relationship; in this case, the 20% withholding tax applies even if the recipient carries out, on a regular basis, self-employment or of enterprise.
9.2	**BONUSES PAID TO ATHLETES AND TECHNICIANS IN THE CONTEXT OF A SPORTING EMPLOYMENT RELATIONSHIP** Bonuses paid to athletes or coaches in the context of a sporting employment relationship pursuant to DLgs. 36/2021, and received in relation to the relative contracts, are subject to taxation according to the rules of the income category in which they fall, depending on the manner in which the work is carried out (subordinate or self-employed work, or coordinated and continuous collaboration); in this case, the bonuses are subject to withholding on the basis of the income relevance that they assume for the recipient and Article 36, para. *6-quater* of Legislative Decree 36/2021 does not apply. For example, if the bonus is received in connection with an employment relationship the payment falls within the employee's income with the application of the withholding tax pursuant to Article 23 of Presidential Decree 600/73.
9.3	**BONUSES PAID BY COMPANIES** Premiums paid by sole proprietorships, commercial companies and entities, other than amateur sports associations (ASDs) and amateur sports clubs (SSDs), as part of their commercial activity, are subject to withholding depending on the income relevance they assume for the recipient, according to the general provisions of general provisions of Presidential Decree 600/73.
10	**ALLOWANCES CONVERTED INTO *WELFARE* - REGIME OF EXCLUSION FROM TAXABLE INCOME - INAPPLICABILITY**
	With the answer to interpello no. 195 of 30.7.2025, the Revenue Agency provided clarifications on the tax regime to be applied to the benefits converted into welfare. In its answer to Interpretation No. 195 of 30 July 2025, the Italian Revenue Agency provided clarifications on the tax regime to be applied to allowances cancelled pursuant to the provisions of the National Collective Labour Agreement and converted into *welfare* benefits upon the employee's choice.

10.1	**CONVERSION OF ALLOWANCES INTO *WELFARE***
continued	The disbursement of the suppressed allowances in the form of company *welfare* is not in line with the *rationale of* Article 51(2) and (3) of the Consolidated Income Tax Act (which provide for specific exceptions to the principle of all-inclusiveness of employee income, listing the works, services and expense reimbursements that do not contribute to forming the taxable base or contribute to it only in part, provided that the disbursement in kind does not result in a circumvention of the ordinary criteria for determining employee income). This is so because such a payment is intended • to replace taxable items of remuneration deemed obsolete • and not to allow access to goods and services of social importance to the generality of employees.
10.2	**TAX REGIME** The Agenzia delle Entrate therefore considers that the portion of remuneration relating to indemnities suppressed pursuant to the provisions of the CCNL, converted into *welfare* benefits at the employee's choice, cannot benefit from the regime of exclusion from the formation of employee income *pursuant to* Article 51, paragraphs 2 and 3 of the TUIR and must therefore be subject to IRPEF according to the ordinary rules for determining employee income. employee's income.
11	**TAX CREDIT FOR THE TRAINING OF YOUNG FARMERS - SUBMISSION OF APPLICATIONS**
	With prov. 24.7.2025 no. 305754, the Agenzia delle Entrate established the procedures and terms for submitting applications for the recognition of the tax credit provided in favour of 'young agricultural entrepreneurs' in relation to expenses incurred in 2024 for participation in training courses relating to the management of the agricultural holding, as per art. 6 of L. 15.3.2024 no. 36 and Ministerial Decree 1.4.2025 (published in the *G.U.* 26.5.2025 n. 120).
11.1	**BENEFICIARIES** The tax credit provided for by Article 6 of Law 36/204 is available to "young farmers" referred to in Article 2 co. 1 lett. a) of Law 36/2024, who at the same time • are over 18 and under 41 years of age (this ana- graphic requirement must be met at the time when the eligible expenses are deemed to have been incurred) • have started their activity since 1.1.2021; • they carry out activities identified by an ATECO 2025 classification code beginning with '01'.
11.2	**ELIGIBLE EXPENSES** Eligible for the tax credit under Article 6 of Law 36/2024 are the expenses, actually incurred in 2024 • for the acquisition of skills, such as training courses, seminars, conferences and *coaching*, relevant to the management of the farm; • travel and subsistence costs for participation in the initiatives referred to in the previous point, up to a maximum amount of 50% of the total subsidised expenses. ***Requirements*** In order to be eligible for assistance • the expenses for the above-mentioned activities must be at the same time – incurred in 2024 (the time of incurrence coincides with the time of payment); – paid through current accounts in the name of the beneficiary and in a way that allows full traceability of the payment (e.g. bank transfer),

follows	debit and credit cards) and the immediate traceability of the payment to the relevant invoice or receipt; • the presentation of a course attendance certificate issued by the provider is also required. ***VAT*** VAT is eligible for subsidy only if it represents an actual non-recoverable cost for the beneficiary.
11.3	**MEASURE OF FACILITATION** The tax credit is due • to the extent of 80% of the expenses actually incurred in the year 2024 and properly documented; • up to a maximum amount of EUR 2,500 for each beneficiary. The maximum total amount of expenses eligible for subsidy is therefore equal to EUR 3,125 for each beneficiary (3,125× 80%= 2,500).
11.4	**COMPLIANCE WITH STATE AID RULES** The tax credit under consideration is granted in compliance with the State aid rules on *de minimis* contributions in the agricultural and general sectors (as per European Commission Regulations 18.12.2013 no. 1408 and 13.12.2023 no. 2831). The Revenue Agency shall register the individual aid in the National State Aid Register and in the SIAN and SIPA registers, pursuant to Article 10 co. 7 of Ministerial Decree No. 115 of 31.5.2017.
11.5	**CUMULABILITY** The tax credit under review may be cumulated with other State aid • provided that they relate to costs other than those eligible for the relief under examination; • or also in relation to the same types of costs eligible for the facility under scrutiny, but only where there is no double financing and provided that such cumulation does not lead to exceeding the aid intensity or aid amount higher aid intensity or aid amount applicable to the type of aid.
11.6	**PROCEDURES AND DEADLINES FOR SUBMITTING APPLICATIONS** To access the tax credit, interested parties must notify the Revenue Agency of the amount of eligible expenses actually incurred between 1.1.2024 and 31.12.2024: • from 25.8.2025 until 24.9.2025; • using the form approved by prov. 24.7.2025 no. 305754, together with the relevant instructions; • exclusively by telematic means, either directly by the beneficiary or through an appointed intermediary; • using exclusively the *software* called 'GESTIONE AZIENDA AGRI-COLA', available free of charge on the Agenzia delle Entrate website. The chronological order in which the communications are submitted is not relevant. ***Substitute communication and waiver*** In the same period from 25.8.2025 to 24.9.2025 it is possible to • submit a new communication, which fully replaces the one previously submitted; • submit a full waiver of the previously communicated tax credit.

	Retransmission of Rejected Communications Communications sent between 20.9.2025 and 24.9.2025 but which have been rejected by the telematic service are considered valid if they are re-transmitted by 29.9.2025 (i.e. within 5 days of the deadline).

11.7	**AMOUNT OF TAX CREDIT AVAILABLE** The maximum amount of the tax credit that can be claimed is equal to the amount of the credit claimed with the communication to the Revenue Agency, multiplied by the percentage that will be made known by a provision of the Revenue Agency. This percentage is obtained on the basis of the ratio between • the total amount of tax credits claimed • the overall limit of the resources allocated for the facilitation, equal to EUR 2 million for 2024. If the total amount of tax credits requested is lower than the available resources, the percentage of tax credit that can be used is 100%.
11.8	**MODALITIES FOR UTILISATION OF THE TAX CREDIT** The tax credit due is utilised • exclusively by offsetting in the F24 form, pursuant to Article 17 of Legislative Decree No. 241/97; a subsequent resolution of the Inland Revenue Agency will provide instructions for completing the F24 form; • by submitting the F24 form exclusively through the telematic services made available by the Revenue Agency, under penalty of rejection of the payment; • as from the third working day following the publication of the Revenue Agency's prov-edment establishing the percentage of the tax credit that can be used and, in any case, not before the date of completion of the training course and the issue of a second receipt communicating the recognition of the tax credit • within the second tax period following the one in which the expenditure was incurred (therefore, by the end of 2026).
11.9	**DISCLOSURE OF THE TAX CREDIT IN THE TAX RETURN** The tax credit shall be disclosed: • in the tax return relating to the tax period in which the notice of allowable expenses is filed with the Revenue Agency (i.e., in the REDDITI 2026 form relating to 2025); • in the tax returns relating to subsequent tax periods, up to the one in which its use ends.
12	**TAX CREDIT FOR INVESTMENTS IN THE SINGLE HALF-DAY ZONE - 50% LIMIT FOR REAL ESTATE - CLARIFICATIONS**
	With its answer to interpello no. 183 of 8.7.2025, the Agenzia delle Entrate has provided clarifications on the criteria for calculating the tax credit for investments in the Single Economic Zone for the South of Italy, pursuant to Article 16 of Law Decree 124/2023, with respect to the limit of 50% provided for real estate.
12.1	**50% LIMIT FOR REAL ESTATE INVESTMENTS** With regard to investments for the purchase of land and the acquisition, construction or expansion of instrumental real estate, Article 16 co. 2 of Decree-Law 124/2023 and Article 3 co. 5 of Decree 17.5.2024 state that "*the value of the land and buildings eligible for the relief may not exceed fifty per cent of the total value of the subsidised* investment". *per cent of the total value of the subsidised investment*".

12.2 *continued*	**CRITERIA FOR CALCULATING THE 50% LIMIT** Considering *the rationale of* limiting the subsidised component relating to the purchase of instrumental real estate assets ('real estate component') with respect to the acquisition of the other subsidised instrumental *assets* ('non real estate component'), in its reply 183/2025 the Italian Revenue Agency has established that, with respect to each single investment project having the required characteristics and relevant for the purposes of the ZES Unica Mezzogiorno tax credit, the value of its subsidised real estate component cannot exceed half (i.e. 50%) of the total value of the subsidised investment. This implies, in essence, that • the subsidised value of the real estate component may not exceed that of the non-property component; • where the real estate investment constitutes the only expenditure attributable to the initial investment project, the same is not eligible for the tax credit due to the absence of other investments eligible for the ZES Unica Mezzogiorno tax credit in other instrumental assets ("non real estate component"). The Agenzia delle Entrate has also clarified that, for the purposes of the limit in question, the following contribute to the value of the real estate component • the cost incurred for the mere purchase of an instrumental real estate unit (whether land or a building); • the related ancillary costs (e.g. notarial costs for drafting the purchase deed); • other expenses pertaining to the purchased unit (such as, for example, capitalised costs, in application of proper accounting principles, relating to the modernisation and/or expansion of the asset for which they are incurred). ***Example of calculation*** For example, in the case of the purchase of new machinery for €270,000 and a capital asset costing €600,000, the real estate component will only count for €270,000 for the purposes of the allowance. The total amount eligible for relief is therefore €540,000.
13	**DISTINCTION BETWEEN 'NON-EXISTENT' AND 'NON-ALLOWABLE' TAX CREDITS - CLARIFICATIONS**
	The Guideline Act of the Ministry of Economy and Finance 1.7.2025 issued some guidelines to distinguish 'non-existent' from 'non-allowable' tax credits unduly compensated. Placing the tax credit in one rather than the other category has various effects, first and foremost penalties: if it is a non-existent credit, the penalty is 70 per cent, whereas if it is a non-allowable credit, the penalty is 25 per cent. Moreover, only for non-existent tax credits the recovery notice may be served by 31 December of the eighth year following the year in which the undue set-off took place (for undue tax credits, on the other hand, there is the ordinary time limit of five years).
13.1	**UNDUE TAX CREDITS** Unclaimed tax credits tend to be those used in breach of legal limits or in the absence of the legislature's requirements. The Ministry of the Economy and Finance, in addition to the classic 'splafonamento' (tax credit used in excess of the annual limit of Article 34 of Law 388/2000, equal to €2 million, or the annual limit of €250,000 pursuant to Article 1, Paragraph 53 of Law 244/2007), gives the following examples • tax credit used over a shorter period of time than provided for by law, e.g. over two years instead of three;

	• tax credit offset to settle debts not provided for by law (sometimes the law establishing the tax credit prohibits the offsetting of, for example, social security debts against the tax credit, or requires a certain type of offset). type of set-off).

13.2	**SUBJECTIVE AND OBJECTIVE REQUIREMENTS FOR THE USE OF THE TAX CREDIT** The tax credit is deemed non-existent if the objective and subjective requirements provided for by the relevant rules are lacking. According to the Ministry of Economy and Finance, in order to identify the aforementioned objective and subjective requirements, reference should not be made to sources that do not have normative value, such as technical manuals not explicitly referred to by the instituting regulations (laws or ministerial decrees). The tax credit, again according to the Ministry of Economy and Finance, should fall into the category of non-eligibility if it '*lacks further elements or qualities identified by detailed technical sources not specifically referred to by the regulations, primary and secondary, of the facilitation*'. In all likelihood, this is the tax credit disallowed on account of the non-eligibility of the expenditure for technical-interpretative issues.
13.3	**INVENTED" TAX CREDIT IN THE F24 FORM** The Ministry of Economy and Finance specifies that the tax credit artificially 'created' in the F24 form, which, therefore, is not reflected in the declaration, is non-existent. In the system prior to the amendments of Legislative Decree 87/2024, on the other hand, this type of tax credit, emerging from the automatic settlement of the declaration, was always considered non-existent. However, the procedure for the disallowance of tax credits arising from the automatic settlement, which provides for a reminder and a reduction of the 25% penalty to one third, should remain in place. If, however, the recovery notice were to be used, the tax credit would, in the light of the foregoing, qualify as non-existent.
14	**TAX CREDIT FOR INVESTMENTS IN RESEARCH AND DEVELOPMENT ACTIVITIES - CERTIFICATION ATTESTING THE QUALIFICATION OF INVESTMENTS - COMMUNICATION TO THE REVENUE AGENCY**
	Within the framework of the Guideline issued by the Ministry of Economy and Finance on 1.7.2025, concerning non-existent and not due tax credits, it has been clarified that the certification on the qualification of the research and development activities, pursuant to Article 23 of Decree-Law 73/2022, may be requested even after the investments have been made, provided that any violations relating to the use of the tax credits have not already been the subject of an official report. In this case, it is pointed out that it would be desirable for the taxpayer who obtains the certification to notify the tax authorities in a collaborative manner, also to avoid possible disputes solely focused on the profile of the tax credit. of the technical qualification of the investment.
15	**WAIVERS BY SHAREHOLDERS WHO ARE NATURAL PERSONS OF DIVIDEND CLAIMS - CLARIFICATION**
	With its answer to Question No. 182 of 8 July 2025, the Italian Revenue Agency stated that, in the case of waivers of dividend credits by natural persons not e n g a g e d in business activities, the tax value of the credit is not zero, but corresponds to its nominal value. corresponds to the nominal value of the same.
15.1	**EXCLUSION OF CONTINGENT ASSETS** Therefore, pursuant to Article 88 co. *4-bis* of the Consolidated Income Tax Law (as inserted by Article 13 co. 1 lett. a) of Legislative Decree 147/2015 starting from the tax period following the one in progress as of 7.10.2015), the waiver is not considered to be out-of-period income for the investee company.

15.2	**LEGAL COLLECTION** Moreover, considering that the shareholders' meeting resolution gives rise to the shareholders' right to the distribution, dividends are to be considered legally collected and, therefore, must be subject to a 26% withholding tax pursuant to Article 27 of Presidential Decree No. 600/73. The Agenzia delle Entrate, confirming its previous res. 13.10.2017 no. 124 and answer to interpello 3.3.2025 no. 59, therefore reiterated its orientation regarding the thesis of the so-called legal takings. To substantiate its considerations, the Agency for the first time makes express reference to the different orientation of Cass. 12.6.2023 no. 16595, according to which the orientation of the ministerial practice has no basis with reference to the regime in force from the tax period following the one in progress on 7.10.2015. According to the answer to interpello 182/2025, the case under consideration, due to the fact that the tax value of the receivable corresponds to its nominal value, differs from the case examined in Cass. no. 16595/2023, in which the waiver of the receivable (relating to interest accrued on a loan granted to the investee company) took place subsequent to the purchase of the same receivable by the renouncing company.
16	**PREFERRED" FOREIGN SOURCE DIVIDENDS - CRITERIA FOR IDENTIFICATION**
	With its answer to interpello no. 191 of 21 July 2025, the Italian Revenue Agency clarified that, in order to distinguish between ordinary and privileged taxed investees, the effective tax level test must be passed both in the year in which the profits accrue and in the year of their distribution. If the level of effective taxation of the foreign investee is more than 50% lower than it would be in Italy, dividends distributed to Italian shareholders are fully taxable. The dividends may, however, be brought back to their natural regime (for capital companies, taxation within the 5% limit) if they fall within the so-called "second exemption" (failure to localise the profits in the State with a privileged regime), for the purposes of which the withholding tax levied by the foreign State is also considered (in essence, the payment of withholding taxes on dividends in the foreign State allows it to be demonstrated that the establishment of the investee in the foreign State is not was dictated by the need to artificially shift profits to that State).
17	**RESIDENTIAL BUILDINGS AFFECTED BY THE FLOODS OF 2023 AND 2024 IN THE REGIONS OF EMILIA ROMAGNA AND TOSCANA - EXEMPTION FROM IMU**
	Article 4 co. *1-bis* of Decree-Law no. 65 of 7.5.2025, inserted upon conversion into Law no. 4.7.2025 no. 101, recognises the exemption from IMU for residential buildings affected by the flooding events occurred in 2023 and 2024 in the Regions of Emilia Romagna and Tuscany.
17.1	**REQUIREMENTS FOR THE EXEMPTION** The IMU exemption concerns buildings for residential use that are, at the same time • located in the territories of the Regions of Emilia Romagna and Tuscany affected by the flooding events occurred from 1.5.2023, from 17.9.2024 and from 17.10.2024, as per the resolutions of the Council of Ministers of 4.5.2023, of 23.5.2023, of 25.5.2023, of 21.9.2024 and of 29.10.2024 • destroyed or subject to trade union evacuation orders, as partially or totally uninhabitable.
17.2	**DURATION OF THE EXEMPTION** In the presence of the above-mentioned requirements, buildings for residential use are exempt from IMU: • starting from the instalment due on 16.12.2025 (second instalment of the IMU for 2025) • and until the final reconstruction or habitability of the buildings themselves, and in any case no later than 31.12.2026.

18	**SIMPLIFIED COMPOSITION AGREEMENT - TAXABILITY OF CONTINGENT ASSETS FROM DEBT REDUCTION**
	With its answer to Interpretation No. 179 of 7 July 2025, the Italian Revenue Agency provided some clarifications on the applicability, or not, of the favourable regime provided for by Article 88 co. *4-ter* of the Consolidated Income Tax Act to the contingent assets from the reduction of debts arising from the simplified composition agreement for the liquidation of assets, pursuant to Articles *25-sexies* and 25-septies of Legislative Decree No. 25-sexies of the Italian Republic. *25-septies* of Legislative Decree 14/2019 (Business Crisis and Insolvency Code, so-called CCII).
18.1	**REGULATORY FRAMEWORK OF REFERENCE** For contingent assets from debt reduction, it is established (Article 88 co. *4-ter* of the TUIR) • full non-taxability for those arising from a bankruptcy or liquidation arrangement, or equivalent foreign procedures; • partial non-taxability for those accrued as a result of reorganisation agreements, debt restructuring agreements, certified reorganisation plans and equivalent foreign procedures. In the second case, it is provided that the reduction of the company's liabilities - including those towards shareholders - does not constitute contingent assets for the part of the contingent asset that exceeds the sum • of the current or past tax losses that can be offset pursuant to Article 84 of the Consolidated Income Tax Act (without considering the 80% limit), including those transferred to the tax consolidation; • of the deduction for the period and the excess relating to the ACE *pursuant to* Article 1, paragraph 4 of Legislative Decree 201/2011 and Ministerial Decree of 3 August 2017; • of interest expense and similar financial charges pursuant to Article 96 co. 4 of the Consolidated Income Tax Act.
18.2	**EXCLUSION OF THE NON-TAXABILITY REGIME** With reference to the negotiated settlement of business crises, Article *25-bis* co. 5 of Legislative Decree No. 14/2019 provides that, as from the publication in the Register of Enterprises of the contract and of the agreement referred to in Article 23 co. 1 lett. a) and c) or of the agreements referred to in Article 23 co. 2 lett. b) of the same Legislative Decree, Articles 88 co. *4-ter* and 101 co. 5 (concerning the deductibility of credit losses) of the Consolidated Law on Income Tax (TUIR) apply. No provision has been dictated with respect to the simplified arrangement procedure for the liquidation of assets provided for in Articles *25-sexies* and *25-septies* of the same Legislative Decree 14/2019, to which, therefore, in the opinion of the Agency, the aforementioned co. *4-ter* cannot apply. The exclusion from taxation may possibly be established in implementation of Article 9 paragraph 1 letter a) no. 3) of Law no. 111 of 9.8.2023 (tax reform proxy law), pursuant to which the relevant implementing Legislative Decrees must provide for the extension to all the institutions disci-plined by Legislative Decree 14/2019 of the provisions set forth in Articles 88 paragraph *4-ter* and 101 paragraph 5 of the TUIR. The draft legislative decree on the third sector, business crises, sports and value added tax, which was preliminarily approved by the Council of Ministers on 22.7.2025, in fact provides for the extension also to the simplified arrangement for the liquidation of assets of the provision that does not consider reductions in debts of the company.
19	**CONTROLLED LIQUIDATION - APPLICATION OF ORDINARY BUSINESS INCOME RULES**
	The Italian Revenue Agency, in its answer to Interpretation No. 177 of 7 July 2025, clarified that in a controlled liquidation, in the absence of special rules for the purpose of determining business income, the ordinary taxation rules set forth in Article 56, paragraph 1, of the TUIR apply, i.e., Articles 85 and 86 of the TUIR, due to the references made. On the other hand, the rules set forth in Article 183 of the TUIR do not apply.

19.1	**DIFFERENCES BETWEEN LIQUIDATION PROCEDURES** The rules governing compulsory liquidation replicate, in several respects, the rules dictated for the larger compulsory liquidation procedure. Such equivalence, however, as clarified by the Revenue Agency, does not legitimise a general reference to the rules dictated for judicial liquidation. It follows that the rules set forth in Article 183 of the TUIR do not apply, even extensively, to the debtor subject to compulsory liquidation. The enabling act No. 111 of 9.8.2023 for tax reform also points in this direction, which identifies the need to define an *ad hoc* taxation regime for minor companies, distinguishing between liquidation institutions and reorganisation institutions.
19.2	**BUSINESS INCOME IN JUDICIAL LIQUIDATION** For companies subject to compulsory liquidation, pursuant to Article 183 para. 1 of the TUIR, the opening of the procedure determines the interruption of the ordinary tax period and the opening of a so-called maxi-period between the date of commencement and the date of closure of the liquidation. Thus, the business income is determined as the difference between the residual assets at the end of the procedure and the net assets of the company at the beginning of the procedure; the latter is determined on the basis of the values fiscally recognised for the assets and liabilities that were part of the procedure. In addition, the duration of the insolvency proceedings and the possible provisional exercise of the business activity are not relevant (Art. 183 para. 2 TUIR).
19.3	**BUSINESS INCOME IN CONTROLLED LIQUIDATION** According to the Inland Revenue Agency, in the absence of special tax rules dictated for companies subject to controlled liquidation proceedings pursuant to Articles 268 et seq. of Legislative Decree No. 14/2019, income must be determined on a period-by-period basis and according to the ordinary taxation rules set forth in Article 56 co. 1 of the TUIR, with Articles 85 and 86 of the TUIR applying. In this sense, the capital gain generated by the transfer of a capital asset (e.g., a real estate, a property or a In this sense, the capital gain generated by the transfer of an asset (e.g., a real estate property), as well as the proceeds generated by any provisional financial year, will not be subject to a different (or special) tax regime.
20	**NEGOTIATED SETTLEMENT - SALE OF BUSINESS AND FI SCAL BONUS MEASURES**
	The Revenue Agency, with its answer to interpello 7.7.2025 no. 178, excluded the application, in the context of the negotiated settlement, of Article 86 co. 5 of the TUIR; therefore, the capital gain (or loss) realised following the sale of the business remains governed by the ordinary rules dictated for the purposes of determining business income. taking.
20.1	**FISCAL BONUS MEASURES** The bonus measures of a fiscal nature connected to the activation, by the entrepreneur, of the negotiated settlement are provided for in order to incentivise its use, similarly to what happens in alternative procedures to judicial liquidation. Pursuant to para. 5 of Article *25-bis* of Legislative Decree 14/2019, from the publication in the Companies Register of the contract and the agreement referred to in Article 23 para. 1 lett. a) and c), or of the agreements referred to in Article 23 para. 2 lett. b), Articles 88 para. *4-ter* and 101 para. 5 of the TUIR apply. From the same date, moreover, Article 26 co. *3-bis* of Presidential Decree 633/72 applies for VAT purposes.
20.2	**DETERMINATION OF BUSINESS INCOME** According to the Inland Revenue Agency, Article 86 co. 5 of the Consolidated Income Tax Law constitutes a special rule with respect to the ordinary rules for determining business income. *The ratio legis*, moreover, is to apply to the negotiated settlement exclusively

follows	the bonus measures indicated in Article *25-bis* co. 5 of Legislative Decree 14/2019 (which does not contemplate Article 86 co. 5 of the TUIR). The irrelevance of capital gains/losses arising from the sale of assets to creditors provided for in Article 86(5) TUIR therefore does not apply in the context of the negotiated settlement procedure.
21	**TAX RISK CONTROL SYSTEM - OPTIONAL REGIME - IMPLEMENTING PROVISION**
	The Ministerial Decree of 9.7.2025, published in the *Official Gazette* no. 164 of 17.7.2025, issued the implementing provisions of the optional regime for the adoption of the *tax* risk *control framework* (TCF), pursuant to Article *7-bis* of Legislative Decree no. 128 (inserted by Legislative Decree 221/2023 and amended by Legislative Decree 108/2024).
21.1	**STAKEHOLDERS** The option to adopt a tax risk detection, measurement, management and control system, pursuant to Article *7-bis* of Legislative Decree 128/2015 • may be exercised by taxpayers who do not meet the requirements to adhere to the collaborative compliance regime set out in Articles 3 - 7 above • allows for similar benefits to those of collaborative compliance for penalty purposes. ***Turnover or revenue limit*** In 2025, taxpayers who have achieved, in one of the three preceding years, a turnover or revenue of at least €750 million, a limit that will be reduced to €500 million in the years 2026-2027 and to €100 million as from the year 2028, may exercise the aforementioned option. ***Possession of the required documentation*** The exercise of the option is also subject to the possession of the following documentation • descriptive document of the activity carried out by the company; • tax strategy duly approved by the management bodies prior to the exercise of the option; • document describing the tax risk detection, measurement, management and control system adopted and its operating methods; • map of business processes; • map of tax risks, including mapping of those arising from accounting standards, identified by the tax risk control system since its implementation and the controls provided for; • certification of the system for the detection, measurement, management and control of the tax risk by an independent professional meeting the requirements of good repute and professionalism.
21.2	**REQUIREMENTS OF THE TAX RISK CONTROL SYSTEM** The exercise of the option entails the commitment to establish and maintain a tax risk detection, measurement, management and control system • drawn up in accordance with the envisaged guidelines • certified, also with regard to its compliance with the accounting principles, by an independent professional in possession of the requirements of honourableness and professionalism. The tax risk control system must be set up and certified, with a date certain, prior to the communication of the option to the Revenue Agency.
21.3	**COMMUNICATION OF THE OPTION TO THE REVENUE AGENCY** The exercise of the option shall be effected by means of a telematic communication to the Revenue Agency:

follows	• using the specific model that will be approved by a provision of the same Agency; • attaching the aforesaid documentation.
21.4	**DURATION AND REVOCATION OF THE OPTION** The optional regime of adopting the tax risk control system has a duration of two tax periods, starting from the beginning of the tax period in which the relative communication is made to the Revenue Agency, after which it is tacitly extended for another two tax periods. To prevent the aforementioned tacit renewal, an express revocation must be made: • to be communicated to the Revenue Agency by means of the appropriate form approved by it; • before the expiry of the two-year term.
21.5	**EFFECTS OF THE EXERCISE OF THE OPTION** In the event of exercising the option to adopt the tax risk control system: • with the exception of tax violations characterised by simulative or fraudulent conduct, administrative sanctions shall not be applied to violations relating to risks of a fiscal nature communicated in advance by means of an interpellation to the competent territorial offices of the Revenue Agency, before the submission of the tax declarations or before the expiry of the relevant tax deadlines, provided that the taxpayer's conduct corresponds exactly to the conduct represented in the interpellation • with the exception of tax violations characterised by simulative or fraudulent conduct or dependent on the indication in the annual declarations of non-existent passive elements, the criminal provisions on false declarations do not apply to tax violations dependent on risks of a fiscal nature communicated to the Revenue Agency by means of the submission of a petition for a tax appeal, provided that the conduct of the taxpayer corresponds exactly to that represented on the occasion of the petition under Article 4 of Legislative Decree No. 74/2000 do not apply.
21.6	**UPDATING THE CONTROL SYSTEM** If, during the term of the option, organisational changes occur that require a comprehensive update of the integrated system for the detection, measurement, management and control of tax risks, a new certificate must be produced. certification must be produced.
21.7	**VERIFICATION OF POSSESSION OF REQUIREMENTS** The Revenue Agency, when checking the tax position of the taxpayer, verifies the possession of the requirements for the exercise of the option. The finding that the requirements for exercising the option are not met or are no longer met, or that the requirements have not been fulfilled, entails the forfeiture of the aforesaid sanctioning benefits, from the beginning of the tax period in which the requirements are no longer met.
22	**PRINCIPAL DWELLING F O R ICI PURPOSES - REQUIREMENT OF HABITUAL RESIDENCE FOR THE OWNER'S FAMILY MEMBERS - UNCONSTITUTIONALITY**
	In its judgment no. 112 of 18.7.2025, the Constitutional Court declared the constitutional unconstitutionality of the former Article 8 para. 2 of Italian Legislative Decree no. 504/92 (in the post-modification version *pursuant to* Article 1 para. 173 lett. b) of Law no. 296/2006), setting forth the requirements for qualifying as a "principal dwelling" for the purposes of ICI. The Constitutional Court ruled that this provision was unconstitutional insofar as it required that the property be used as a habitual dwelling not only by the owner, but also by his family members.

22.1	**QUALIFICATION OF 'PRINCIPAL DWELLING' FOR ICI PURPOSES** The aforementioned Art. 8 co. 2 of Legislative Decree 504/92 (in force until the introduction of the IMU, with Art. 8 of Legislative Decree 23/2011) identified as the 'main dwelling' for ICI purposes the property unit used as a habitual dwelling at the same time • by the owner (by way of ownership, usufruct or other right in rem) • and by his family members. The provision added that the main dwelling was presumed to coincide, unless proven otherwise, with the registered residence. ***ICI reliefs for the main dwelling*** In the event of a finding of the qualification of 'main dwelling' for the purposes of ICI: • the aforementioned Article 8 co. 2 of Legislative Decree 504/92 provided for a deduction from the tax; • as from 1997, pursuant to Article 8(3) of Legislative Decree No. 504/92, the municipality could decide to reduce by up to 50 per cent the municipal property tax (ICI) due for the principal dwelling, or to grant a higher deduction than that provided for *by law pursuant* to the preceding paragraph 2; • as from the year 2008, Article 1, paragraph 1 of Law Decree No. 93/2008 provided for the exclusion from ICI of principal residences not registered in the cadastral categories A/1, A/8 and A/9 (for residences registered in these categories, the concessions referred to in the two points above applied). categories were applicable).
22.2	**ALIGNMENT TO THE PREVIOUS JUDGMENT NO. 209/2022 ON THE PRINCIPAL DWELLING FOR IMU PURPOSES** The Constitutional Court, with judgement no. 112 of 18 July 2025, declared the unconstitutionality of the aforementioned Article 8, paragraph 2, of Legislative Decree 504/92 in the part in which it established, for the purposes of the qualification of 'principal dwelling' for ICI purposes, the requirement of habitual dwelling also referring to the possessor's family members, rather than to the possessor alone. The Constitutional Court recalls the grounds of its previous judgement no. 209 of 13.10.2022, by which it declared the unconstitutionality of the rules relating to the qualification of 'main dwelling' for the purposes of IMU pursuant to Article 13, paragraph 2, of Law Decree no. 201/2011 and Article 1, paragraph 741, letter b) of Law no. 160/2019, where they required the requirements of 'habitual dwelling' and 'registered residence' also referring to the members of the possessor's household (and not only to the possessor). the possessor's household (and not only to the possessor himself).
22.3	**REQUIREMENTS FOR THE 'MAIN DWELLING' FOR ICI PURPOSES AFTER THE INTERVENTION OF THE CONSULTA** Following the judgment of the Constitutional Court 112/2025, in order to qualify as a "main dwelling" for the purposes of ICI (with the associated benefits) it becomes sufficient that the property is used as the habitual abode of the possessor (the use as a habitual abode also by the possessor's family members not being relevant). ***Relevance for pending judgments*** The Constitutional Court's ruling 112/2025 concerns the former regulation of ICI, now replaced by IMU. However, this ruling is nonetheless relevant to the pending judgments, which at the same time • relate to the years in which the ICI discipline was in force *pursuant to* Article 8 co. 2 of Legislative Decree no. 504/92; • concern the qualification of 'principal dwelling' for property used as a habitual residence by the owner alone (and not by his family members). In the aforesaid judgments, in fact, the rules resulting from the Consulta's pronouncement must be applied (according to which, for the purposes of establishing the qualification of "principal dwelling" for

follows	ICI, only the habitual dwelling of the possessor is relevant, and not also that of his family members). ***Irrelevance for so-called 'exhausted relations*** It is understood that the rules deriving from the Constitutional Court's intervention cannot be invoked with respect to the so-called "exhausted relations", which are found if the taxpayer • has not validly challenged the notice of assessment by which the municipality challenged the qualification of "principal dwelling" for the purposes of ICI; • has challenged that notice, but the relevant proceedings have already been concluded by a final judgment. ***Refund application*** According to the jurisprudence of legitimacy and the majority doctrine, in the case of a tax payment that has become undue by virtue of a sentence of the Constitutional Court, the five-year term for requesting the reimbursement of the local tax pursuant to Article 1, paragraph 164 of Law 296/2006 runs from the date of payment. Therefore, following the judgment of the Constitutional Court 112/2025 112/2025, the refund of the ICI already paid for the years in question would in any case appear to be precluded.
23	**FORFEITURE OF THE TWO-YEAR COMPOSITION AGREEMENT FOR TAX DEBTS EXCEEDING EUR 5,000 - READMISSION TO THE 'ROTTAMAZIONE-*QUATER*'**
	In order to enter into the two-year composition agreement (CPB), it is necessary not to have final tax and social security debts exceeding €5,000. However, accession to the arrangement is possible if the total debts exceed this amount, but there are instalments or suspensions in place. With its answer to interpello 7.7.2025 no. 176, the Agenzia delle Entrate clarified that the forfeiture occurred in 2024 of the instalment payment of a tax debt exceeding €5,000, in implementation of the so-called '*rottamazione-quater*' under Law 197/2022, does not allow to benefit from the 2024-2025 two-year arrangement with creditors. The obstacle to the two-year arrangement with creditors created by the forfeiture of the instalment plan is not remedied by the taxpayer's subsequent adherence to the '*rottamazione-quater*' scheme with a petition filed in 2025, since the relevant constituent law (Article *3-bis* of Law Decree 202/2024, converted into Law 15/2025) does not extend the positive effects of the institute to the CPB as well.
24	**OBSTACLES TO THE FLAT-RATE REGIME UNDER L. 190/2014**
	In its answer to interpello 7.7.2025 no. 181, the Revenue Agency confirms that, for a person already in business, the commencement of a further activity in the course of 2025 for which the special VAT margin regime would be applicable (ordinarily), does not hinder the use of the flat-rate regime for both the new activity and the pre-existing ones. In the case examined, the forfeitary regime was already applied with respect to the fixed and itinerant trade of small household appliances, to which the taxpayer intended to add the new activity of selling second-hand goods. The Agenzia delle Entrate confirms that, in this hypothesis, the forfeitary regime can be applied for both activities. The practice document confirms the previous answer to interpello 11.2.2020 no. 48.
25	**PERMANENT ESTABLISHMENT IN ITALY - INTERVENTION - TREATMENT FOR VAT PURPOSES**
	With its answer to interpello No. 193 of 24 July 2025, the Revenue Agency examined the conditions under which the intervention on transactions carried out in Italy, by a permanent establishment of a non-resident company, may be considered 'qualifying' for the purposes of the application of VAT.

25.1	**REGULATORY AND PRACTICAL FRAMEWORK** Pursuant to Article 53(2) of EU Regulation No. 282 of 15.3.2011, if a taxable person has a fixed establishment within the territory of the Member State where the tax is due, the fixed establishment is deemed not to be involved '*unless the technical or human resources of that fixed establishment are used*' for transactions inherent in the making of the supply, '*before or during the making of that supply*'. In order to assess the actual scope of the permanent establishment's involvement and whether it takes on the status of taxable person in respect of each transaction, a specific assessment of the activities carried out is required. Generally speaking, the permanent establishment of a non-resident company in Italy assumes a relevant role in the performance of the transaction. As a general rule, the permanent establishment of a company not resident in Italy plays a relevant role in the execution of the purchases in Italy only if it carries out activities functional to the negotiation of the contracts.
25.2	**SPECIFIC CASE** Based on the factual elements examined in the reply to interpello 193/2025, it appears that the activity carried out by the Italian permanent establishment is divided into two segments. The first segment is dedicated to small devices and the sales process is handled by the permanent establishment, which maintains direct relationships with customers and manages *marketing* actions to increase sales. The second segment is for larger devices and activities are taken care of directly by the parent company. According to the Agenzia delle Entrate, the permanent establishment performs a 'qualifying' intervention only for the activities of the first segment, the full autonomy of the Italian permanent establishment's personnel in the management and conclusion of commercial sales relationships being decisive. On the other hand, for the second segment, the intervention of the permanent establishment is not considered 'qualifying', since the operations functional to the conclusion of the contracts are fully managed by the non-resident parent company non-resident parent company.
25.3	**ADEMPEMENTS** The Italian Revenue Agency specifies that the transactions carried out in Italy by the parent company must be kept separate from those relating to the VAT position of the Italian permanent establishment. Separate entries must therefore be made in the VAT registers and a separate annual VAT return form must be filed. In addition, it seems to be affirmed that, as regards the compilation of the LIPE communication, the tax arising from the sectional registers, referring respectively to the transactions of the parent company and those of the Italian permanent establishment, must be reported in a unified manner in lines VP3 and VP5. realised with the intervention of the Italian permanent establishment.
26	**NATURAL PERSON SHIPOWNER OF A PLEASURE CRAFT - QUALIFICATION AS A SUBSTITUTE TAXPAYER 'BY OPTION' - EXCLUSION**
	With legal advice 15.7.2025 no. 10, the Italian Revenue Agency clarified that a natural person who is the owner of a pleasure craft, and who acts outside the activity of a commercial enterprise, cannot opt to qualify as withholding agent and consequently will not be able to withhold tax on the emoluments paid to the crew employed. In fact, the identification of the subjects that take on the role of withholding agent, carried out by Article 23 of Presidential Decree 600/73, is peremptory; in relation to natural persons, it is therefore necessary to exercise a commercial or agricultural enterprise or an art or profession. Therefore, the natural person shipowner of a pleasure craft, who acts outside the activity of a commercial enterprise, cannot, at his own option, qualify as withholding agent for the purpose of withholding tax on the emoluments paid to his employees, even if, as pointed out by the petitioner, *they* '*carry out activities of high* *professionalism with an organisation comparable to that of a small company*'.

27	**PAYMENT DELAYS - IDENTIFICATION OF 'LEGAL' DEFAULT RATES AP-PLICABLE IN THE SECOND HALF OF 2025**

The European Central Bank (ECB) has reduced the interest rate on the main refinancing operations of the Eurosystem:

- with the monetary policy decision of 30.1.2025, from 3.15% to 2.90%, to run from 5.2.2025;
- with the monetary policy decision of 6.3.2025, from 2.90% to 2.65%, to run from 12.3.2025;
- with the monetary policy decision of 17.4.2025, from 2.65% to 2.40%, to run from 23.4.2025;
- with the monetary policy decision of 5.6.2025, from 2.40% to 2.15%, as from 11.6.2025.

For the purposes of the identification of the "legal" rates of arrears under Legislative Decree No. 231 of 9.10.2002, the aforementioned measure of 2.15% is relevant for the second half of 2025, as indicated in the co-munication of the Ministry of Economy and Finance published in the *Official Gazette* No. *161* of 14.7.2025
n. 161.

In relation to the period from 1.7.2025 to 31.12.2025, the "legal" rates of interest for late payment for commercial transactions and services of self-employed persons, also with respect to public administrations, as well as between self-employed persons and companies, are set at

- 14.15% (2.15%+ 8%+ 4%), for transactions involving agricultural products and/or foodstuffs (Articles 2 and 4 of DLgs. 8.11.2021 no. 198);
- 10.15% (2.15%+ 8%), for other commercial transactions.

Extension to all self-employed persons

As a result of Article 2 of Law No. 81 of 22.5.2017 (so-called "*Jobs Act* of the self-employed"), in force since 14.6.2017, the discipline of "legal" interest for late payment has been extended to all self-employed workers, in relation to commercial transactions between:

- self-employed workers and enterprises;
- self-employed workers and public administrations;
- self-employed workers.

Previously, reference was only made to persons exercising 'a liberal profession'.

Contractual derogations

The parties may agree on an interest rate for late payment that differs from the 'legal' rate:

- in commercial transactions between enterprises and/or between self-employed persons;
- provided that this is not grossly unfair to the creditor.

However, it must be considered that

- in commercial transactions involving agricultural and/or food products, the rate is mandatory;
- in "subcontracting" relationships, the rate may only be set at a higher rate.

DEADLINE	FULFILLMENT	COMMENT
20.8.2025	Payment of VAT balance instalment 2024	VAT-registered taxpayers shall pay, with interest and surcharges, in relation to the balance of the tax arising from the declaration for the year 2024 (VAT Form 2025): • the sixth instalment, if the first instalment is paid by 17.3.2025; • the third instalment, if the first instalment is paid by 30 June 2025; • the second instalment, if the first instalment is paid by 21.7.2025 or 30.7.2025.
20.8.2025	Payment of tax and contribution instalments	Both VAT-registered and non-VAT-registered persons must pay the balances and instalments of taxes and contributions deriving from the 2025 REDDITI 2025 and IRAP 2025 forms, with interest: • the third instalment, if the first instalment is paid no later than 30.6.2025; • the second instalment, if the first instalment is paid by 21.7.2025, 30.7.2025 or 31.7.2025.
20.8.2025	Tax payments from the REDDITI PF 2025 form	Individuals filing the REDDITI PF 2025 form and who are eligible for the extension provided for in Article 13 of DL 84/2025, must make the payment, with a 0.4% surcharge • of the balance for the year 2024 and of the first advance payment, if any, for the year 2025 relating to IRPEF, to the "cedolare secca" on leases, to IVIE, to IVAFE and to the tax on the value of crypto-assets • of the balance for the year 2024 relating to IRPEF surcharges and of the possible advance payment for the year 2025 of the municipal surcharge; • of the balance for the year 2024 and of the first advance payment, if any, for the year 2025 relating to the surtax (15% or 5%) for taxpayers falling within the flat-rate tax regime *pursuant to* Law 190/2014; • the balance for the year 2024 and the first advance payment, if any, for the year 2025 relating to the 5% substitute tax for so-called 'minimum taxpayers' (Article 27, paragraph 1 of Legislative Decree 98/2011); • other taxes due on the basis of the income declaration. In general, these payments can be made in instalments.
20.8.2025	Payments of INPS contributions by model PF 2025 INCOME TAX RETURN	Individuals registered with the Craftsmen's or Tradesmen's Management of INPS, or with the Separate Management of INPS *pursuant to* Law 335/95 as self-employed workers, who may benefit from the extension referred to in Article 13 of Decree-Law 84/2025, must make the payment, with a 0.4% surcharge, of the: • balance of contributions for the year 2024; • first advance payment of contributions for the year 2025. This deadline also applies to members of limited liability companies:

DEADLINE	DEADLINE	COMMENT
follows		• artisans or traders, carrying out activities with ISA; • even if they are not under the 'fi-scale transparency' regime. Such payments may be made in instalments.
20.8.2025	Tax payments from REDDITI SP 2025 form	Partnerships and persons treated as such, which may benefit from the extension provided for in Article 13 of DL 84/2025, must make the payment, with a surcharge of 0.4%, of the taxes due on the basis of the income tax return (e.g. substitute and additional taxes, IVIE and IVAFE for ordinary partnerships). In general, these payments can be made in instalments.
20.8.2025	Tax payments from the REDDITI SC and ENC 2025	IRES taxpayers with a tax period coinciding with the calendar year who have approved (or should have approved) their financial statements or accounts by 31.5.2025, or who do not have to approve their financial statements or accounts, who can benefit from the extension under Art. 13 of Decree-Law 84/2025, must make the payment, with a 0.4% surcharge, of the taxes due for the balance for 2024 or on account for 2025 (e.g. IRES, related surcharges and substitute taxes, IVIE and IVAFE for non-commercial entities). In general, these payments can be made in instalments.
20.8.2025	IRAP payments	Partnerships and persons treated as such, and IRES entities with a tax period coinciding with the calendar year that have approved (or should have approved) the financial statements or accounts by 31.5.2025, or that do not have to approve the financial statements or accounts, which may benefit from the extension under Article 13 of Law Decree 84/2025, must make the payment, with a 0.4% surcharge: • of the IRAP balance for the year 2024; • of the first IRAP advance payment, if any, for t h e year 2025. These payments may be made in instalments.
20.8.2025	Payment of VAT balance 2024	Persons with VAT registration, who may benefit from the extension provided for in Article 13 of DL 84/2025, must make the payment of the VAT balance for 2024, resulting from the 2025 VAT form, if not yet made, with a surcharge of 0.4% interest for each month or fraction of a month after 17.3.2025 (until 30.6.2025) and with a further surcharge of 0.4% (also calculated on the previous one) for the period 22.7.2025 - 20.8.2025. This payment may be paid in instalments.
20.8.2025	VAT payment from Tax Reliability Indices	Natural persons with VAT registration number, partnerships and persons treated as such, and IRES taxpayers with a tax period coinciding with the calendar year who have approved (or should have approved) their financial statements or accounts by 31.5.2025. accounts by 31.5.2025, or which do not have to

DEADLINE	FULFILLMENT	COMMENT
follows		approve the financial statements or accounts, to which the synthetic indexes of tax reliability (ISA) are applicable and who benefit from the extension referred to in Article 13 of DL 84/2025, must make the payment, with a 0.4% surcharge, of the VAT due on the higher revenues or com-pensations declared to improve their reliability profile. This payment can be made in instalments.
20.8.2025	Chamber of Commerce fee payment	Sole proprietorships, partnerships, and IRES entities with a tax year coinciding with the calendar year that have approved (or should have approved) their financial statements or accounts by 31.5.2025, or that do not have to approve their financial statements or accounts, which may benefit from the extension under Article 13 of DL 84/2025, must pay the annual fee to the Chamber of Commerce for the main office and the local units, with a surcharge of 0.4%. cali units.
20.8.2025	Instalment payments for revaluation of business assets	Individuals carrying on a business activity, with a tax period coinciding with the solar year, who may benefit from the extension provided by Article 13 of Law Decree 84/2025, must make the payment, with a 0.4% surcharge, of the instalment of the substitute taxes due for • the revaluation of business assets carried out in the financial statements as at 31.12.2022; • the franking of the revaluation surplus; • the realignment of the civil and fiscal values of the assets.
20.8.2025	Declaration and payment of '*exit tax*	Companies having transferred their residence abroad, which may benefit from the extension provided for by Article 13 of Decree-Law No. 84/2025 and which by 20.8.2025 pay the balance relating to the last tax period of residence in Ita-Italy, must submit to the territorially competent office of the Revenue Agency the communication • concerning the option for the suspension or the instalment of the tax due following the transfer (so-called '*exit tax*'); • together with the relevant documentation. In the case of an instalment plan, the first instalment must also be paid by this deadline.
20.8.2025	Transmission of purchase data from abroad	VAT taxable persons, resident or established in Italy, must electronically transmit to the Revenue Agency, in XML format via the Interchange System • data relating to transactions involving the purchase of goods and the provision of services from persons not established in Italy; • in relation to documents proving the operation received in July 2025 or to operations carried out in July 2025. The communication does not concern:

DEADLINE	FULFILLMENT	COMMENT
follows		• transactions for which a customs bill or electronic invoice has been received; • purchases of goods and services that are not territorially relevant for VAT purposes in Italy pursuant to Articles 7 to 7-*octies* of Presidential Decree 633/72, if they do not exceed EUR 5,000 per transaction. transaction.
20.8.2025	Monthly VAT payment	Taxpayers with VAT registration under the monthly regime must: • settle VAT for the month of July 2025; • pay the VAT due. Persons who outsource bookkeeping to third parties and have notified the tax office of this, may refer to the VAT that became due in the second previous month when settling and paying VAT. If the amount due, together with that of January, February, March, April, May and June 2025, does not exceed the limit of EUR 100, the payment may be made together with that of the following month. VAT on transactions resulting from subcontracting contracts may be paid quarterly, without interest, if a deadline for payment of the price has been agreed after the delivery of the goods or the notification of the supply. performance of the service.
20.8.2025	VAT payment second quarter 2025	Taxpayers registered for VAT under the optional quarterly regime must: • settle the VAT for the quarter April-June 2025; • pay the VAT due, with a 1% surcharge for interest. If the amount due, together with the amount due for the quarter from January to March 2025, does not exceed EUR 100, it may be paid together with the amount due for the following quarter. VAT on transactions arising from subcontracting agreements may be paid without interest if a deadline for payment of the price has been agreed upon after the delivery of the goods or the notification of the supply of services. performance of the service.
20.8.2025	VAT payment second quarter 2025	Taxpayers registered for VAT under the quarterly regime 'by nature' (e.g. road hauliers, petrol stations and subcontractors) must • settle VAT for the quarter April-June 2025; • pay the VAT due, without interest. If the amount due, together with that of the quarter

DEADLINE	FULFILLMENT	COMMENT
follows		January-March 2025, does not exceed the limit of EUR 100, the payment may be made at the same time as the payment for the following quarter.
20.8.2025	Payment of withholding and additional taxes	Withholding agents shall pay • withholding taxes levied in July 2025; • IRPEF surcharges withheld in the month of July 2025 on employee and assimilated income. Persons who pay fees for self-employment or commissions may not pay the withholding taxes referred to in Articles 25 and *25-bis* of Presidential Decree 600/73, within the deadline under review, if the total amount of the withholding taxes paid in January, February, March, April, May, June and July 2025 does not exceed €100. A condominium paying consideration for works or services contracts may refrain from paying the withholding taxes pursuant to Article *25-ter* of Presidential Decree 600/73, within the deadline in question, if the cumulative amount of the withholding taxes made in the months of June and July 2025 does not exceed at least EUR 500.
20.8.2025	Communication of additional data on withholdings and deductions in substitution of Form 770	Withholding agents with no more than five employees as at 31.12.2024 may communicate to the Revenue Agency • the additional data on the withholdings and deductions made in July 2025 on income from employment or self-employment, or similar, paid with the F24 form, by means of the special prospectus approved with Revenue Agency prov. 31.1.2025 no. 25978; • in lieu of submitting Form 770/2026 relating to 2025. Tax withholding agents that avail themselves of this option must • apply it in relation to the entire year 2025; • submit the F24 form and the additional schedule exclusively through the telematic services of the Revenue Agency, directly or through an authorised intermediary. As a transitional measure, the supplementary statement relating to withholdings and deductions made in July 2025 and paid by 20.8.2025 may be submitted to the Revenue Agency by 30.9.2025. Revenue Agency by 30.9.2025.
20.8.2025	INPS artisans' and traders' contributions	Persons enrolled in the INPS artisans' and traders' management scheme must make the payment of the second instalment of social security contributions included in the minimum-income amount (so-called 'fixed' contributions), relating to the April-June 2025 quarter. Information for the payment of the contribution

DEADLINE	FULFILLMENT	COMMENT
follows		due can be retrieved from the Cassetto previ-denziale per artigiani e commercianti, via the INPS website *(*www.inps.it).
20.8.2025	INAIL premium instalment	Employers and principals must pay the third instalment of premiums • due on balance for 2024 and on account for 2025; • with interest applied.
20.8.2025	Amusement machine taxes	Operators of mechanical or electromechanical amusement and entertainment machines must pay entertainment tax and VAT due • on the basis of the annual average flat-rate taxable amounts established for the individual categories of apparatus; • in relation to the apparatus and devices installed in July 2025.
25.8.2025	Submission of INTRASTAT forms	Persons who have carried out intra-community transactions submit IN-TRASTAT forms to the Inland Revenue Service: • for the month of July 2025, either compulsorily or optionally; • by telematic transmission. Persons who, in July 2025, exceeded the threshold for the quarterly submission of IN-TRASTAT forms shall submit • the models for the month of July 2025, specially marked, either compulsorily or optionally; • by telematic transmission. With the determination Agenzia delle Dogane e dei Mo-nopoli 23.12.2021 no. 493869, the new INTRASTAT forms were approved and further sem- simplifications for the submission of INTRA- STAT forms, applicable starting with the lists for 2022.
25.8.202	Submission of applications for training tax credit for young farmers	Young farmers who, in 2024, incurred expenses for participation in training courses relating to the management of the farm, can start to communicate to the Revenue Agency the amount of expenses eligible for the envisaged tax credit: • using the form approved by the Agenzia delle Entrate with prov. 24.7.2025 no. 305754, together with the relevant instructions; • exclusively electronically, directly by the beneficiary or through an appointed intermediary; • using exclusively the *software* entitled 'GESTIONE AZIENDA AGRICOLA', available free of charge on the available free of charge on the website of the website of the Revenue Agency.

DEADLINE	FULFILLMENT	COMMENT
follows		The communication must be made by 24.9.2025; the chronological order in which communications are submitted is not relevant.
28.8.2025	Payment of audit fee	Co-operative societies, co-operative credit banks and mutual benefit societies must pay the contribution for the performance of 'co-operative auditing', due for the two-year period 2025-2026. Payment shall be made • by means of the F24 form, if the co-operative is not a member of a recognised national association; • according to the modalities established by the recognised national recognised national representative associations, for associated cooperatives.
29.8.2025	Regularisation of tax payments from REDDITI 2025 and IRAP 2025 forms	Individuals who have made insufficient payments of taxes due in full for 2024 or on account for 2025, relating to the 2025 REDDITI 2025 and IRAP 2025 forms, for which the deadline with the 0.4% surcharge was 30.7.2025, may regularise their infringements by applying the reduced penalty of 1.25%, plus statutory interest. After the deadline in question, the regularisation • if made before 28.10.2025, entails the application of the reduced penalty of 1.39%, plus statutory interest; • if made after 28.10.2025 and by 31.10.2026, it entails the application of the reduced penalty of 3.13%, plus statutory interest. If no payment has been made by 30.7.2025, the voluntary repayment shall be made • with reference to the "ordinary" deadline of 30.6.2025 for payment without the 0.4% surcharge; • applying the reduced penalty of 1.39% (by 29.9.2025, as 28.9.2025 falls on a Sunday), or the reduced penalty of 3.13% (after 29.9.2025 and by 31.10.2026), plus statutory interest.
31.8.2025	Declaration and payment of VAT under the "IOSS" regime	Taxable persons who have adhered to the special "IOSS" regime must submit to the Revenue Agency, electronically, the declaration for the month of July 2025 concerning distance sales of imported goods • not subject to excise duty • sent in consignments of an intrinsic value not exceeding 150 euro; • intended for a consumer in a Member State of the European Union.

DEADLINE	FULFILLMENT	COMMENT
cont'd		The return must also be submitted in the absence of transactions covered by the scheme. The VAT due on the basis of this declaration must also be paid by the deadline in accordance with the rates of the Member State in which the supply is deemed to have taken place. supply is deemed to have taken place.
1.9.2025	REDDITI SC 2025 tax payments	IRES taxpayers with a tax period coinciding with the calendar year who have approved (or should have approved) their financial statements or accounts in June 2025, in accordance with the law, or in July 2025 on second call, must make the payment, with a 0.4% surcharge, of the taxes due for the balance for 2024 or on account for 2025 (e.g. IRES, related surcharges and substitute taxes). In general, these payments can be made in instalments.
1.9.2025	IRAP payments	IRES taxpayers with a tax period coinciding with the calendar year who have approved (or should have approved) their financial statements or accounts in June 2025, in accordance with the law, or in July 2025 on second call, must make the payment, with a 0.4% surcharge: • of the IRAP balance for the year 2024; • the first IRAP advance payment, if any, for the year 2025. These payments may be made in instalments.
1.9.2025	VAT payment from tax reliability indexes	IRES taxpayers with a tax period coinciding with the calendar year who have approved (or should have approved) their financial statements or accounts in June 2025, in accordance with legal provisions, or in July 2025 on second call, to whom the synthetic tax reliability indices (ISA) are applicable, must make the payment, with a 0.4% surcharge, of the VAT due on the higher revenues declared to improve their reliability profile. This payment may be paid in instalments.
1.9.2025	Payment of chamber tax	IRES taxpayers with a tax period coinciding with the calendar year who have approved (or who should have approved) their financial statements or accounts in June 2025, in accordance with the law, or in July 2025 on second call, must pay, with a 0.4% surcharge, the annual fee to the Chambers of Commerce for their main office and local units.
1.9.2025	Instalment payments for revaluation of business assets	Persons carrying on a business activity, with a tax period coinciding with the calendar year, who by 1.9.2025 pay the balance relating to the previous tax period, must make the payment, with a 0.4% surcharge, of the instalment of the substitute taxes due for:

DEADLINE	FULFILLMENT	COMMENT
segue		• the revaluation of business assets carried out in the financial statements as at 31.12.2022; • the redemption of the revaluation asset balance; • the realignment of the civil and tax values of the assets.
1.9.2025	Declaration and payment of '*exit tax*	Companies that have transferred their residence abroad and that by 1.9.2025 pay the balance relating to the last tax period of residence in Italy must submit the communication to the territorially competent Revenue Agency office: • on the option to suspend or remit the tax due following the transfer (so-called '*exit tax*'); • together with the relevant documentation. In the case of an instalment plan, the first instalment must also be paid by this deadline.
1.9.2025	Registration of Lease Agreements	The contracting parties must provide for • the registration of new leases of real estate with effect from the beginning of August 2025 and the payment of the corresponding registration fee; • the payment of registration tax also for renewals and annuities of lease agreements commencing in August 2025. For registration, it is mandatory to use the "RLI model" approved by Revenue Agency prov. 19.3.2019 no. 64442. For the payment of the relevant taxes, it is mandatory to use the 'F24 payments with identification elements' (F24 ELIDE), indicating the appropriate tax codes established by the Inland Revenue.