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MARCH 2025: MAIN OBLIGATIONS

REAL ESTATE UNITS WITH SUPERBONUS INTERVENTIONS – OMITTED CADASTRAL UPDATE – INVITATIONS TO REGULARIZE – IMPLEMENTING PROVISIONS

Pursuant to Art. 1, paragraphs 86 and 87 of Law No. 213 of December 30, 2023 (Budget Law 2024), the Italian Revenue Agency's measure No. 38133 of February 7, 2025, has established the rules for spontaneous compliance notices sent to taxpayers who have failed to update cadastral records for properties subject to interventions benefiting from the Superbonus under Art. 119 of Decree-Law No. 34/2020.

1.1 VERIFICATION OF THE CADASTRAL UPDATE OBLIGATION

Regarding real estate units affected by Superbonus interventions, based on specific selective lists, the Italian Revenue Agency verifies whether the property owner has submitted the declaration for updating cadastral records, as required under Art. 1, paragraphs 1 and 2 of Ministerial Decree No. 701/94 (known as DOCFA), including any potential effects on the cadastral income of the property (Art. 1, paragraph 86 of Law No. 213/2023).

If the verification reveals that the cadastral records have not been updated, the Italian Revenue Agency may send the taxpayer a specific notice, pursuant to Art. 1, paragraphs 634-636 of Law No. 190/2014 (Art. 1, paragraph 87 of Law No. 213/2023).
These so-called compliance letters are intended to facilitate the taxpayer's voluntary compliance, in this case, concerning cadastral update obligations.

1.2 VERIFICATION CRITERIA

During the parliamentary inquiry response No. 5-03532 on February 12, 2025, the Italian Revenue Agency clarified that, in the initial phase, these compliance notices will be sent to owners of properties benefiting from the Superbonus under Art. 119 of Decree-Law No. 34/2020 that are currently registered in the Cadastre:

- Without cadastral income;
- Or with cadastral values significantly lower than the costs incurred for the construction work.

The Agency notes that, in both cases, it is reasonable to assume that the execution of interventions may have altered the property's structure, classification, or category, thus requiring a cadastral update.

1.3 COMPLIANCE NOTICE

Measure No. 38133 of February 7, 2025, states that the Italian Revenue Agency sends compliance notices via certified email (PEC) to the digital address listed in the INI-PEC directory, as per Art. 6-bis, paragraph 2 of Legislative Decree No. 82/2005, or via registered mail with return receipt.
The same communication is also made available in the taxpayer's tax account (cassetto fiscale).

The compliance notice contains the necessary information for the taxpayer to assess the accuracy of the data held by the tax authorities. Specifically, it includes:

- The taxpayer's tax code, company name, surname, and first name;
- The cadastral identification of the property, as indicated by the taxpayer in the communication regarding the option for credit transfer or invoice discount under Art. 121 of Decree-Law No. 34/2020, submitted concerning the Superbonus interventions;

- An invitation to provide (if necessary) clarifications and appropriate documentation via the "Document Submission and Requests" service available in the reserved area of the Italian Revenue Agency's website.

1.4 OPTIONS FOR THE RECIPIENT OF THE NOTICE

Upon reviewing the data provided by the Italian Revenue Agency in the compliance notice, the taxpayer (or an authorized representative) may submit clarifications and appropriate documentation (via the "Document Submission and Requests" service) if:

- They believe the communicated data is inaccurate;
- Or they wish to provide elements, facts, and circumstances unknown to the Italian Revenue Agency that justify why a cadastral update was not required in this case.

Alternatively, the cadastral owner, upon receiving the compliance letter, may choose to regularize their position by submitting a declaration under Art. 1, paragraphs 1 and 2 of Ministerial Decree No. 701/94 for updating the cadastral records.

Reduction of Penalties through Regularization

If the cadastral owner proceeds with the update, the penalty for failure to update cadastral records within the required timeframe, as stipulated in Art. 31 of Royal Decree-Law No. 652/39 (referenced by Art. 60 of Presidential Decree No. 1142/49), is reduced according to the voluntary correction procedure (ravvedimento operoso) provided for in Art. 13 of Legislative Decree No. 472/97.

EMPLOYMENT ABROAD – APPROVAL OF STANDARD WAGES FOR 2025

With Ministerial Decree (DM) of January 16, 2025, published in the Official Gazette on February 11, 2025, No. 34, the standard wages applicable in 2025 for employees working abroad have been approved.

2.1 TAX RELEVANCE

For tax purposes, under Article 51, paragraph 8-bis of the Italian Consolidated Income Tax Act (TUIR), standard wages apply in place of actual wages for employees who meet the following conditions:

- They are fiscally resident in Italy;
- They work abroad on a continuous basis and as the exclusive object of their employment relationship, even if hired by a foreign employer or if their work is performed in multiple foreign countries;
- They stay abroad for more than 183 days within a 12-month period, even if this period spans two calendar years, and even if they return to their tax residence in Italy once a week (Article 1, paragraph 98 of Law No. 207/2024).

This provision does not apply in the following cases:

- Employees on business trips;
- Employees working in a country that has a tax treaty with Italy preventing double taxation and stipulating that employment income is taxed exclusively in the foreign country;
- Public sector employees;
- Employees working in an economic sector not covered by the decree.

Wages paid before the publication of the DM of January 16, 2025

Due to the delay in publishing the DM of January 16, 2025, the Italian Revenue Agency previously clarified that if wages are paid before the publication of the decree for the relevant tax year, reference should be made to the decree approved for the previous year, with subsequent adjustments (Circular No. 7 of January 26, 2001, § 7.4).

2.2 SOCIAL SECURITY RELEVANCE

For social security purposes, standard wages are used to calculate social security contributions for mandatory insurance coverage concerning:

- Italian workers;
- Citizens of other EU member states;
- Non-EU workers holding a valid residence permit and an employment contract in Italy, who are sent by their employer to work abroad:
    - In countries where no social security agreements are in force;
    - Or in countries with social security agreements, but only for insurance schemes not covered by existing agreements.

Workers in countries with social security agreements

In its ruling No. 17646 of September 6, 2016, the Italian Supreme Court (Corte di Cassazione) stated that when agreements allow Italian social security coverage for employees working abroad—overriding the principle of territoriality—employers must determine the contribution base using the actual wages paid abroad.

In this case, standard wages used for tax purposes under Article 51, paragraph 8-bis of the TUIR are **not applicable** for social security purposes because:

- This provision introduces a 183-day threshold based on the concept of “tax residence” under Article 2, paragraph 2 of the TUIR, which is irrelevant in the social security context where "residence" is not a determining factor;
- Applying this provision to social security contributions would create an unjustified disparity between employees subject to the Italian social security system who stay abroad for more or less than 183 days, and it would reduce public revenues, ultimately affecting employees’ social security benefits.

Social Security Contribution Adjustments

Due to the delay in issuing the DM of January 16, 2025, INPS Circular No. 43 of February 18, 2025, has clarified that employers may adjust social security contributions for January and February 2025:

- By May 16, 2025;
- Without additional penalties or charges.

TAX DEDUCTION FOR "BUILDING" WORKS – OPTION FOR DISCOUNT/TRANSFER – EXPENSES INCURRED FROM MARCH 30, 2024 – ADDITIONAL CONDITIONS INTRODUCED BY DL 39/2024 – CLARIFICATIONS

By **March 16, 2025**, taxpayers must submit the communication to the Italian Revenue Agency regarding the option for the so-called "discount on the invoice" or the transfer of the eligible tax deduction, as provided by Article 121 of Decree-Law (DL) 34/2020, related to expenses incurred in 2024 for the "building"

interventions listed in paragraph 2 of the same article (Italian Revenue Agency Provision No. 35873 of February 3, 2022).

3.1 LIMITATIONS ON THE OPTION

The possibility of opting for the **transfer/discount** has been significantly reduced since **February 17, 2023**, due to Article 2, paragraph 1 of DL 11/2023, and later by Articles 2 and 3 of DL 212/2023 and Article 1 of DL 39/2024. Consequently, for expenses incurred in **2024**, only those who meet the **specific safeguard clauses** outlined in these regulations can still opt for the benefit.

3.2 EXPENSES INCURRED BY MARCH 30, 2024

To be eligible for the **transfer/discount**, an additional requirement introduced by **Article 1, paragraph 5 of DL 39/2024** must be met:

By March 30, 2024, at least part of the **expense, documented by an invoice, must have been incurred for works already completed**.

Regarding this requirement, the **Italian Revenue Agency's ruling No. 26 of February 12, 2025**, further clarified that:

- **All conditions set by law must be met simultaneously**, meaning that by March 30, 2024, part of the expense must be **incurred and documented by an invoice for completed works**.
- The phrase **"works already completed" excludes**:
  - Professional service fees;
  - Expenses for urbanization charges;
  - Payments for public land occupation fees;
  - Costs for obtaining administrative authorizations;
  - Expenses for technical services required before work starts and preliminary site activities (e.g., material purchases or scaffolding installation).

4 STAMP DUTY AND GOVERNMENT CONCESSION TAX ON CORPORATE BOOKS – DETERMINATION CRITERIA

In ruling No. 42 of February 20, 2025, the **Italian Revenue Agency** clarified that the payment of **stamp duty and the government concession tax on corporate books**, when applicable under the relevant legal requirements, must be made **regardless of how the books or registers are kept** (whether in physical or digital form).

4.1 SCOPE OF THE STAMP DUTY

Stamp duty is required from the outset for maintaining **ledgers, the journal, and the inventory book**, as specified in Article 2214, paragraph 1 of the Italian Civil Code, as well as for any other register that is **stamped and authenticated** in accordance with Articles 2215 and 2216 of the Civil Code (Article 16, letter a) of the Tariff, Part I, annexed to Presidential Decree (DPR) 642/72).

However, **books and registers required solely by tax laws** are exempt from this duty (Article 5 of Table B annexed to DPR 642/72).

This clarification **reiterates previous guidance** issued in the **ruling No. 346 of May 17, 2021**, which emphasized the different methods for determining and paying stamp duty based on how the book or register is kept.

4.2 REGISTER KEPT IN PAPER FORMAT

If the register is **kept on paper** or **printed from mechanical recording systems**, the duty is applied every **100 pages or fraction thereof**, at the following rates:

- **€16.00** for corporations (which pay the government concession tax at a flat rate).
- **€32.00** for other entities.

The payment must be made using a **stamp label (contrassegno) or Form F23**.

4.3 REGISTER KEPT IN DIGITAL FORMAT

If the register is **kept in digital format**, the duty is applied every **2,500 entries or fraction thereof**, at the same rates mentioned above, **in accordance with Article 6 of Ministerial Decree (DM) of June 17, 2014**.

Payment must be made using **Form F24**.

Referring to the clarification provided in **Circular No. 36 of December 6, 2006** (regarding the previous DM of January 23, 2004), the ruling confirms that **social books** listed in **Article 2421 of the Civil Code** also fall within the scope of **DM 17.6.2014**.

4.4 DEFINITION OF "REGISTRATION"

Regarding corporate books, the ruling clarifies that the term **"registration"** refers to a **single line** (e.g., in a meeting minute or an entry regarding a shareholder's admission or exit from the company).

This interpretation is consistent with the combined provisions of **Articles 5 and 16 of DPR 642/72**, which define:

- A **sheet** as four pages.
- A **page** as one side of a sheet.
- In the case of mechanically printed forms, the duty is applied per **100 lines or fraction thereof**.
- For **books and registers**, the duty applies per **100 pages or fraction thereof**.

Conventionally:

- A sheet consists of **100 lines**.
- A page consists of **25 lines**.

Therefore, for **digital corporate books**, the stamp duty is applied per **100 pages (or fraction thereof), corresponding to 2,500 lines (or fraction thereof)**.

To calculate the applicable duty, reference can be made to the **digital visualization** of the books, ensuring that the **pages and lines** can be counted just as with a **physical book**. **PDF or PDF/A formats** allow for this type of visualization.

4.5 SCOPE OF THE GOVERNMENT CONCESSION TAX

The **government concession tax** for **stamping and numbering books and registers** is due for books covered under **Article 2215 of the Civil Code**, as well as for any other books and registers that, **either by legal obligation or voluntarily (Article 2218 of the Civil Code)**, are **stamped** accordingly.

However, this tax **does not apply** to books required **solely by tax laws** (Article 23 of the Tariff annexed to **DPR 641/72**).

For entities **other than corporations**, the government concession tax is **€67.00 for every 500 pages or fraction thereof**.

Reiterating what has already been stated regarding **stamp duty**, the ruling clarifies that the **government concession tax** is **also applicable** when books and registers are kept using **digital tools**. This is because the **progressive numbering and authentication requirements remain unchanged**, and compliance is ensured through the application of a **timestamp and digital signature** by the entrepreneur or another authorized delegate **at least once a year**.

For tax calculation purposes, the **same criteria as for stamp duty** apply. Therefore, the tax is due **every 500 pages (or fraction thereof), corresponding to 12,500 lines (or fraction thereof)**.

5. TAX CREDIT FOR INVESTMENTS IN SIMPLIFIED LOGISTIC ZONES (ZLS) FOR 2024 - FULL USE IN OFFSETTING - CREATION OF THE TAX CODE

Regarding the tax credit granted to companies that made investments in Simplified Logistic Zones (ZLS) from May 8, 2024, to November 15, 2024, under Article 13 of Decree Law No. 60 of May 7, 2024, converted into Law No. 95 of July 4, 2024, Ministerial Decree No. 30/08/2024, and Revenue Agency provision No. 445771 of December 12, 2024:

- The Revenue Agency provision No. 39039 of February 10, 2025, established the percentage of the tax credit actually available.
- The Revenue Agency resolution No. 10 of February 6, 2025, introduced the tax code for its use in compensation on the F24 form.

5.1 FULL USE OF THE REQUESTED CREDIT

Considering that the total amount of the requested tax credits, as shown by the valid communications submitted, without any renouncement, was lower than the available financial resources (amounting to 80 million euros), the tax credit actually available to each beneficiary is 100% of the amount requested in the application, rounded to the nearest euro.

Each beneficiary can view the amount of the credit available for compensation via their “Tax Drawer,” accessible from the reserved area on the Revenue Agency’s website.

5.2 TAX CODE

For the use in compensation via the F24 form, pursuant to Article 17 of Legislative Decree No. 241/97, the tax code for this tax credit is “7038,” named “Tax Credit for Investments in ZLS - Article 13 of Decree Law No. 60 of May 7, 2024.”

The F24 form must be submitted exclusively through the electronic services provided by the Revenue Agency, under penalty of rejection of the payment operation.

5.3 F24 FORM COMPLETION

When completing the F24 form:

- The above-mentioned tax code must be reported in the "Erario" section, in the "credit amounts offset" column, or, in cases where the taxpayer needs to reverse the credit, in the "debt amounts paid" column.
- In the "reference year" field, the year in which the costs were incurred should be indicated in the format "YYYY."

6. TAX CREDIT FOR TRANSITION 5.0 INVESTMENTS - FAQ UPDATE

The Ministry of Enterprises and Made in Italy has published the updated FAQ, last updated on February 24, 2025, regarding the tax credit for 5.0 investments under Article 38 of Decree Law No. 19/2024, in light of the changes introduced by Article 1, paragraphs 427-429 of Law No. 207/2024 (2025 Budget Law).

The update specifically addresses:

- The introduction of the new chapter "Simplified Procedure (paragraph 9-bis of Article 38)" with 4 new FAQs clarifying the application of this provision.
- FAQ 2.17, regarding sales contracts with a retention of title clause.
- FAQ 2.18, concerning the validity of conformity certificates/verified expertise issued for the 4.0 Transition tax credit.
- FAQ 4.18, regarding the verification of mandatory energy savings requirements in the automatic distribution sector.
- A complete revision of the section on the cumulation of benefits.
- Modification of FAQ 10.1, regarding the update on the interpretation of the exception in Article 5, paragraph 1, letter d) of Ministerial Decree No. 24/07/2024, related to activities that produce a high dose of substances classified as hazardous special waste, whose long-term disposal could cause environmental damage.

Some FAQs have also been removed/modified due to the new provisions.

7. TAX CREDIT FOR INVESTMENTS IN SOUTHERN ITALY UNDER LAW 208/2015 - PARTIAL RETURN OF SUPPLY WITH COMPROMISE AGREEMENT - REDETERMINATION OF THE INCENTIVE

With the response to the request for clarification on February 18, 2025, No. 37, the Revenue Agency stated that the return of part of the supply, with a compromise agreement, after receiving authorization to use the tax credit for investments in Southern Italy (pursuant to Article 1, paragraphs 98-108 of Law 208/2015), results in the redetermination of the incentive.

7.1 QUALIFICATION AS A TRANSFER OF GOODS

This "resale," even if made in favor of the same supplier, falls under the transfer to third parties according to Article 1, paragraph 105 of Law 208/2015, which requires the redetermination of the original tax credit.

7.2 INDICATION IN THE INCOME TAX RETURN FORM

In the case subject to the request for clarification, by the deadline for submitting the REDDITI SC 2024 form (October 31, 2024), the amount of the tax credit "accrued" in 2022, but authorized on February 7, 2024, and thus to be reported in column F2 of row RU5, was already "redetermined" due to the transfer made on June 25, 2024. Therefore, the reduced amount should be indicated in this column, not the original amount.

In this case, it is possible to submit an integrated declaration.

8. PROMOTIONAL KIT ASSIGNED TO THE BEST CLIENTS - REGULATION FOR IRES, IRAP, AND VAT

In response to the Revenue Agency's request for clarification on February 11, 2025, No. 25, the applicable regulation for IRES, IRAP, and VAT concerning the transfer of goods as a discount for achieving pre-determined sales targets was clarified.

8.1 CASE SUBJECT TO THE REQUEST FOR CLARIFICATION

The requesting company (a wholesale dealer of tires and auto accessories) proposed a commercial agreement to two categories of clients.

- **Agreement for "strategic" clients**
  The company offered a promotional kit (clothing products, branded with the customer's chosen logo) to “strategic” clients who reached certain tire purchase targets.
- **Agreement for "profile" clients**
  For other clients (defined as “profile”), the company proposed an agreement that provided, simultaneously:
  - A promotional kit under the same conditions as for "strategic" clients.
  - Points (for achieving specific goals) to be used on an online platform managed by a third-party company.

8.2 REGULATION FOR IRES PURPOSES

The costs related to the goods or services offered to the clients are considered relevant and, therefore, deductible for IRES purposes.
In fact, both the circumstances prompting the company to grant the benefit to certain categories of clients based on a specified purchase threshold, and the methods of granting the incentive, seem likely to increase the revenue generated by the purchases made by the beneficiaries of the promotion.

8.3 REGULATION FOR IRAP PURPOSES

For IRAP purposes, the expenses allocated to the Income Statement in accordance with the accounting principles adopted by the company are generally characterized by the requirement of relevance to the taxable base. Therefore, the aforementioned costs related to the goods or services offered to clients are deductible for the amount allocated in the financial statements.

8.4 REGULATION FOR VAT PURPOSES

The commercial transaction consisting of providing in-kind discounts to clients upon reaching a specific sales target can be classified within the sales excluded from the taxable base under Article 15, paragraph 1, number 2 of Presidential Decree No. 633/72. This also applies to goods that "profile" clients can choose by redeeming accumulated points from the online catalog managed by a third-party company.

9. GROUP MEDICINE ASSOCIATION - REGULATION FOR IRES, IRAP, AND VAT PURPOSES

In the response to the request for clarification from the Revenue Agency on February 7, 2025, No. 23, the tax treatment of a (non-recognized) association carrying out general medicine activities in the form of group medicine under Article 40 of Presidential Decree No. 270/2000 and the National Collective Agreement for General Medicine of March 22, 2005, was explained.

9.1 REGULATION FOR IRES PURPOSES

For IRES purposes, the association is classified as a private entity other than a company whose exclusive or main activity is the exercise of commercial activities, under Article 73, paragraph 1, letter b) of the TUIR, and is required to submit the REDDITI SC form.
In this case, the association performs a service activity for the member doctors, consisting of:

- Incurred costs for personnel and management costs in its own name;
- Subsequent recharging of these costs to the members without additional charges.

9.2 REGULATION FOR IRAP PURPOSES

For IRAP purposes, the qualification of the association as a private entity carrying out commercial activities exclusively or predominantly leads to the application of the provisions for commercial entities.
The related taxable base must therefore be calculated based on the "direct take" principle from the financial statements of capital companies (pursuant to Article 5 of Legislative Decree No. 446/97).

9.3 REGULATION FOR VAT PURPOSES

The Agency confirms the applicability of the VAT exemption regime under Article 10, paragraph 2 of Presidential Decree No. 633/72 for the cost shifting, by the association in question, to the individual members (in line with the response to the request for clarification from the Revenue Agency on July 26, 2024, No. 161).

10. INPS CONTRIBUTIONS FOR ARTISANS AND MERCHANTS - CONTRIBUTION RATES FOR 2025

INPS, with Circular No. 38 of February 7, 2025, has outlined the contributions due in 2025 for members of the Artisan and Merchant Management, which will increase by an additional 0.30 percentage points compared to 2024 for collaborators under the age of 21, reaching the standard rate of 24% as set forth in Article 24, paragraph 22 of Decree-Law No. 201/2011.

10.1 ARTISAN CONTRIBUTION RATES

For artisans, the contribution rate for 2025 remains at 24%.
Starting in 2025, this 24% rate will also apply to co-workers/collaborators under the age of 21, who in 2024 benefited from the reduced rate of 23.70%.

For income exceeding €55,448.00 (compared to the previous threshold of €55,008.00), the rate has increased by one percentage point, becoming 25%.

10.2 MERCHANT CONTRIBUTION RATES

For merchants, an additional rate is due to finance the severance indemnity for the definitive termination of the activity, which, since January 1, 2022, is set at 0.48% (Article 1, paragraph 380 of Law No. 178/2020).
The contribution rate for 2025 remains at 24.48%.
Starting in 2025, this 24.48% rate will also apply to co-workers/collaborators under the age of 21, who in 2024 benefited from the reduced rate of 24.18%.

For income exceeding €55,448.00 (compared to the previous threshold of €55,008.00), the rate has increased by one percentage point, becoming 25.48%.

10.3 REDUCTION FOR RETIRED INDIVIDUALS

For artisans and merchants over the age of 65 who are already retired, the contributions due are reduced by half.

10.4 NEW REDUCTION FOR INDIVIDUALS STARTING A BUSINESS

Article 1, paragraph 186 of Law No. 207 of December 30, 2024 (2025 Budget Law) provides for a 50% reduction in contributions for workers who register for the first time in 2025 with one of the Artisan and Merchant Managements.

Eligible Subjects: The benefit is available to the following individuals:

- Individual entrepreneurs or partners of companies;
- Family collaborators of the above individuals.

Entrepreneurs under the flat-rate regime (Article 1, Law No. 190/2014) are also eligible for this reduction.

Duration: The reduction is available for 36 consecutive months, starting from the date the business activity begins or from the first entry into the company in 2025.

Further Instructions: In Circular No. 38 of February 7, 2025, INPS announced that further details on the applicable regulations and instructions for submitting the application will be provided in a subsequent circular.

10.5 MATERNITY CONTRIBUTION

For both artisans and merchants, the maternity contribution remains at €0.62 per month (€7.44 annually).

10.6 MINIMUM INCOME FOR 2025

The minimum income for 2025, to be considered when calculating the contributions due from artisans and merchants, is €18,555.00 (previously €18,415.00).

10.7 MAXIMUM INCOME FOR 2025

The maximum income for 2025, above which no further INPS contributions are due, is:

- €92,413.00 (previously €91,680.00) for individuals who had a contribution history as of December 31, 1995;
- €120,607.00 (previously €119,650.00) for those who had no contribution history as of December 31, 1995, and who were registered after January 1, 1996.

10.8 ADHERENCE TO THE BIENNIAL PREVENTIVE AGREEMENT

Adherence to the biennial preventive agreement under Legislative Decree No. 13/2024 does not absolve the contributor from meeting contribution obligations, and the agreed taxable base remains relevant for determining mandatory social security contributions.
The taxpayer still has the option to pay contributions based on the actual income if it exceeds the agreed amount as adjusted according to Articles 15 and 16 of Legislative Decree No. 13/2024.

10.9 MODALITIES AND DEADLINES FOR CONTRIBUTION PAYMENTS

Contributions must be paid using the F24 form by the following deadlines:

- May 16, 2025, August 20, 2025, November 17, 2025, and February 16, 2026, for the four installments of contributions based on the minimum income;
- The deadlines for the payment of IRPEF, for the contributions due on income exceeding the minimum, apply to the first and second 2025 advance payments and the 2025 balance.

11 NEW REGIME FOR IMPATRIATED WORKERS - FOREIGN RESIDENCY REQUIREMENT

The Revenue Agency, through responses to requests for clarification on February 20, 2025 (No. 41) and February 28, 2025 (No. 53), provided clarifications regarding the conditions under which the foreign residency requirement of six or seven tax periods, as outlined in Article 5 of Legislative Decree No. 209/2023, applies to the new regime for impatriated workers.

11.1 MINIMUM PERIOD OF PRIOR FOREIGN RESIDENCY

Article 5, paragraph 1, letter b) of Legislative Decree No. 209/2023 establishes that, for tax benefits, workers must not have been fiscally resident in Italy in the three tax periods prior to their transfer. However, based on the same provision, the minimum period of prior residence abroad is increased to six tax periods if there is “continuity” between the foreign employer and the employer in Italy. This applies to a worker who was employed abroad by company X, and upon transferring to Italy, continues to work for the same company X or a company in the same group.

The foreign residency requirement increases to seven periods if the worker, before their transfer abroad, was previously employed in Italy for the same employer for whom they worked abroad, or for a company in the same group. Thus, if the worker had worked for company X (or a company within the same group) before transferring abroad, the observation period extends to seven years.

11.2 VERIFICATION OF EMPLOYER CONTINUITY

The Revenue Agency specifies that the foreign residency requirement should be assessed "in the tax period when the worker transfers their tax residency to Italy," verifying if, upon returning to Italy, the worker continues to work for the same employer with whom they worked abroad "during the tax period prior to the transfer of residency to Italy or, at least, until the date of the transfer."

Thus, the Agency clarifies that in the case of the same worker returning to Italy in 2024 to work for the same company X where they worked abroad until 2020 (after which the employment was interrupted), the minimum period of foreign residency is three years. The employer continuity is relevant only if verified during the tax period prior to the return to Italy.

11.3 EXAMPLE OF SIX PERIODS OF FOREIGN RESIDENCY

The clarification in response to request No. 41/2025 was based on the situation of a worker who worked in Italy during 2015-2018 for two different employers:

- Company A (part of group H) in 2015 and 2016;
- Company B (outside the group) in 2017 and 2018.

The worker then transferred abroad and worked for company C, which is also part of group H. In 2025, the worker returned to Italy to work again for company A in group H.

In this case, the Agency required a minimum period of six years of foreign residency because, in the period immediately before transferring abroad, the worker was employed by company B (outside the group), thus breaking the continuity required for extending the residency requirement to seven periods.

11.4 SEVEN YEARS OF FOREIGN RESIDENCY

The situation examined in response to request for clarification No. 53/2025 concerns an individual who had worked until the beginning of 2019 for an Italian company D, and then transferred abroad to the foreign branch of the same company D until June 30, 2024.
From that date, the employment relationship with company D was interrupted to begin self-employment.
On January 1, 2025, the individual returned to Italy to resume working for company D.
According to the Revenue Agency, the six months of self-employment do not interrupt the continuity of the relationship (between the foreign employer and post-return employer) that is necessary to extend the residency requirement. Moreover, the fact that before expatriating the individual had already worked for the company they return to means that the minimum period of foreign residency is seven years.

11.5 SIMULTANEOUS USE OF THE BENEFIT FOR BOTH PARENTS

Response No. 53/2025 also examines the provision in Article 5, paragraph 4 of Legislative Decree No. 209/2023, according to which the tax exemption is 60% when there is a minor child.
The clarification specifies that:

- It does not matter if, after the return, the children become adults;
- In the absence of any specific limits regarding the entitlement of the enhanced benefit to only one parent, the benefit applies, under all other conditions, to both parents.

12 MINIMUM PERIOD OF PRIOR FOREIGN RESIDENCY FOR SELF-EMPLOYED IMPATRIATED WORKERS

In response to request for clarification No. 22 of February 7, 2025, the Revenue Agency clarified that Article 5, paragraph 1, letter b) of Legislative Decree No. 209/2023 should be interpreted to require a minimum period of foreign residency of six or seven years when the impatriate carries out self-employed activities in Italy for their previous foreign employer, even if that employer is only one of the impatriate's clients.

12.1 REQUIREMENT OF PRIOR FOREIGN RESIDENCY

Under the law cited, if the worker provides their services in Italy for the same employer they worked for abroad before transferring, or for a company within the same group, the minimum period of prior foreign residency (normally three tax periods) is increased:

- To six tax periods if the worker was not previously employed in Italy for the same employer or a company in the same group;
- To seven tax periods if the worker was employed in Italy for the same employer or a company in the same group before their transfer abroad.

12.2 CONDITIONS FOR SELF-EMPLOYED WORKERS

The case examined by the Revenue Agency concerns a French national who worked in Italy until March 2018 and then moved to Switzerland, where they worked in Zurich under an employment contract until August 2024. From this date, the person moved to Italy and entered into a consultancy contract with the same company in Zurich (the only client of the individual).
According to the Revenue Agency, the impatriate benefit is applicable because the person had at least six years of prior residency (from 2018 to 2023).

Therefore, a longer period of foreign residency is required because, according to the Revenue Agency, Article 5, paragraph 1, letter b) of Legislative Decree No. 209/2023 does not specify the type of contract that must exist between the parties (for the extension of the prior residency period), meaning that in all cases where services are rendered (even self-employed) for the same former employer, the period of foreign residency must be considered as six or seven years.

12.3 CRITICAL ASPECTS

The ruling, which provides this outcome if the impatriate performs their professional services "even for the previous foreign employer," appears to take the principle to its extreme, imposing the six- or seven-year period not only in cases of single-employer situations but also in cases where the former employer is just one of the impatriate's clients.

13 MEDICAL DIRECTORS AND NON-DIRECTOR HEALTHCARE PERSONNEL - SUBSTITUTE TAX ON ADDITIONAL SERVICES - SCOPE OF APPLICATION

In response to legal advice No. 2 of February 3, 2025, the Revenue Agency clarified the scope of the substitute tax on IRPEF and related regional and municipal surcharges (set at 15%), introduced by Article 7 of DL No. 73/2024, for compensation paid for additional services performed by medical directors and non-director healthcare personnel.
Given that the law explicitly references both the National Collective Bargaining Agreement (CCNL) for the Health Sector for the 2019-2021 triennium (dated January 23, 2024) and the CCNL for healthcare personnel for the 2019-2021 triennium, the substitute tax:

- Does not apply to compensation paid to personnel in private accredited healthcare, for whom the collective agreements cited in the law do not apply;
- Does apply to all personnel with permanent or fixed-term contracts employed by companies and entities in the sector specified in Article 6 of the 2021 CCNL for the healthcare sector, i.e., healthcare and hospital companies within the national health service and for additional services performed by directors and healthcare personnel to whom national collective bargaining agreements apply.

14 INHERITANCE TAX RETURN - MODEL UPDATE

With provision No. 47335 of February 13, 2025, the Revenue Agency updated:

- The inheritance tax return model and the related instructions for filling it out;
- The technical specifications for the electronic submission of the return.

This update was necessary to incorporate the changes introduced by the reform of inheritance and donation tax under Legislative Decree No. 139/2024, applicable to successions opened from January 1, 2025.

14.1 SELF-LIQUIDATION OF INHERITANCE TAX

For successions opened from January 1, 2025, under the revised Articles 27 and 33 of Legislative Decree No. 346/90, inheritance tax (and no longer only the mortgage and cadastral taxes) is self-liquidated by taxpayers.
Article 27, paragraph 2 of Legislative Decree No. 346/90 states that inheritance tax "is liquidated by the subjects liable for payment based on the inheritance tax return under Article 33." Furthermore, Article 33 establishes that "the subjects liable for payment self-liquidate the tax based on the inheritance return," and specifies that "if a higher tax is due, the office will notify a liquidation notice within two years from the

submission of the inheritance return, with an invitation to pay within sixty days."
New Article 37 clarifies that "the taxpayer must pay the self-liquidated tax [...] within ninety days from the submission of the return."
Lastly, Article 38 provides for the possibility of deferring the payment.

To incorporate these changes, a specific section has been added to the EF framework of the inheritance tax return model, where the self-liquidated tax can be indicated, and its payment managed according to the new rules.

It is worth mentioning that the tax codes for the payment of self-liquidated inheritance tax were approved by the Revenue Agency with resolution No. 2 of January 10, 2025.

14.2 OTHER CHANGES IN THE UPDATED MODEL

Other updates to the inheritance tax return model and instructions include:

- Testamentary trusts, for which the payment of mortgage and cadastral taxes is fixed, as well as the possibility to choose the "entry taxation" option, opting for the payment of inheritance tax, self-liquidated, "at the time of filing the return, instead of when the assets and rights are transferred to the final beneficiaries";
- Penalties introduced by Legislative Decree No. 87/2024, concerning the late payment of inheritance tax, mortgage and cadastral taxes, and other self-liquidated taxes;
- The application of special taxes concerning mortgage and cadastral services;
- The request for "Certification of successful submission of the return."

14.3 USE OF THE NEW MODEL

The updated model can be used for the electronic submission of the inheritance tax return starting from February 14, 2025.

It should be noted that for successions opened up to December 31, 2024, the new electronic model of the inheritance tax return is now used. However, following the update, the system adopts different procedures based on the date of the succession opening:

- Self-liquidation only for successions opened from January 1, 2025;
- Official liquidation for those opened prior.

15 STAFF SECONDMENT - VAT RELEVANCE FOR CONTRACTS ENTERED INTO FROM JANUARY 1, 2025 - CONDITIONS

In response to request for clarification No. 38 of February 18, 2025, the Revenue Agency outlined the conditions under which secondment services provided under contracts signed or renewed from January 1, 2025, will be subject to VAT.

15.1 LEGISLATIVE FRAMEWORK

Due to Article 16-ter of DL No. 131/2024 converted into Law No. 166/2024, Article 8, paragraph 35 of Law No. 67/88 was repealed. This provision had previously established a special VAT exemption regime for staff secondment and/or loans, where only reimbursement for the related cost was paid.
With the removal of this regulation, the secondment and/or loan of personnel now constitutes a service subject to VAT, provided there is a direct link between the service rendered and the payment received.
The principles set out by the Court of Justice of the European Union in its ruling on Case C-94/19 (March 11,

2020) apply, stating that secondment and/or loan services are subject to VAT "provided that the amounts paid by the subsidiary to the parent company, on the one hand, and the secondment or loan services, on the other, are mutually dependent."

Following the explicit provision of Article 16-ter, paragraph 2 of DL 131/2024, the behavior of taxpayers prior to January 1, 2025, is preserved:

- Whether they applied VAT in accordance with the EU Court ruling in Case C-94/19;
- Or whether they did not apply VAT based on the domestic law in force at that time.

15.2 SPECIFIC CASE

The case examined in the response to request for clarification concerns two companies that are not part of the same group. The agreement stipulates that the receiving company is only required to reimburse the costs actually incurred by the seconding company for each worker (including all contributions and insurance charges listed in detail on the payslips), without any profit margin.

The Revenue Agency notes that, regardless of the absence of a "mark-up," the operation may still be considered relevant for VAT purposes, as it is characterized by the requirement of remuneration and a direct link between the service provided by the seconding company and the counterperformance made by the receiving company. This link is evident because the amounts paid to the seconding company and the secondment of its personnel "condition each other mutually."

Based on these premises, a service subject to VAT is considered to be in place, as it is rendered under an agreement signed starting January 1, 2025. As a result, the amounts paid by the receiving company to the seconding company as reimbursement for the costs incurred for each seconded worker will be subject to tax.

16 PUBLIC CONTRACTS - WITHHOLDINGS AS A GUARANTEE - INVOICING METHODS

In the response to request for clarification No. 52 of February 28, 2025, the Revenue Agency provided the following clarifications regarding the invoicing methods with the split payment mechanism for services subject to the "guarantee withholding" provided for by Legislative Decree No. 36/2023 (Public Contracts Code).

16.1 VAT TAX BASE

Guarantee withholdings are part of the VAT tax base of the operation, as their amount is an integral part of the payment due to the contractor/service provider. The latter may issue an invoice for the full amount, including the portion related to the withholding tax.

16.2 VAT DUE DATE

However, the VAT due on the withholding amounts remains tied to the moment of payment, unless the public contracting entity decides to bring forward the due date to the moment of receiving the invoice or its registration, as provided by Article 3 of the Ministerial Decree No. 23/1/2015 for transactions subject to the split payment mechanism.

17 RENTAL OF A SPORTS CENTER - SERVICES RENDERED BY A NON-PROFIT SPORTS SOCIETY - VAT EXCLUSION SCHEME - CONDITIONS

In the response to request for clarification No. 36 of February 17, 2025, the Revenue Agency clarified that the rental services of a sports facility provided:

- By a non-profit sports society (SSD),
- To sports associations registered with the same sports federation,
- Benefit from the VAT exclusion regime under Article 4, paragraph 4 of Presidential Decree No. 633/72, as long as the activity is carried out in accordance with the institutional objectives of the entity.

17.1 "DECOMMERCIALIZATION" VAT REGIME

It is important to note that Article 4, paragraph 4 of Presidential Decree No. 633/72 (in its current applicable version, i.e., before the changes introduced by Article 5, paragraph 15-quater of Legislative Decree No. 146/2021, which will apply from January 1, 2026) excludes from the scope of VAT the transfer of goods and services provided for a fee by association entities, provided certain conditions are met. Specifically, operations must be carried out:

- By specific categories of associations, including sports associations (ASD);
- In accordance with their institutional objectives;
- Towards certain entities, including other associations that carry out the same activity and are part of a local or national organization by law, regulation, or statute, as well as their respective members, associates, or participants, and registered members of their national organizations.

17.2 CONDITIONS FOR VAT EXCLUSION

Regarding the subjective aspect, it has been legally established that the VAT exclusion regime also applies to non-profit capital companies formed as sports societies (Art. 3 of DL 113/2024). Therefore, in this specific case, this condition is met.
Regarding other requirements, the Revenue Agency believes that clarifications provided concerning de-commercialization for IRES purposes for associative entities can also apply to VAT, given the analogous nature of Article 4, paragraph 4 of DPR 633/72 with Article 148, paragraph 3 of the TUIR. Therefore, the condition that the beneficiary entities belong to a single local or national organization can be considered fulfilled, also for VAT purposes, when both the supplying SSD/ASD and the receiving SSD/ASD are affiliated with the same sports federation (see Revenue Agency Circular 1.8.2018 No. 18, paragraph 7.8).

17.3 COMPLIANCE WITH INSTITUTIONAL OBJECTIVES

Furthermore, as clarified for IRES de-commercialization purposes, for VAT purposes, the activity is considered to be in accordance with the institutional objectives if it constitutes the natural completion of the specific and particular purposes characterizing the entity.
Moreover, the fact that Article 9 of DLgs. 36/2021 classifies sports facility management activities, including rental, as "instrumental" activities is not sufficient by itself to conclude that such activities are always carried out in line with the institutional purposes. Therefore, it is necessary to examine the actual use of the rented facility.
In this specific case, the rental services can be excluded from VAT, provided that "the rented facility continues to be used and intended exclusively for the performance of sports activities," which is the main objective of the SSD.

18 SALE OF GOODS TRANSFERRED ABROAD - ABSENCE OF TERRITORIAL REQUIREMENT - IRRELEVANT FOR VAT PURPOSES

In response to request for clarification No. 34 of February 14, 2025, the Revenue Agency confirmed that a sale involving the exportation of goods is relevant for VAT purposes and non-taxable under Article 8 of DPR 633/72 when, along with the transport or shipment of the goods outside the EU, the transfer of ownership or real rights over the goods is also completed. In the absence of such conditions, the sale of goods located in a third country following exportation under a free-on-board arrangement is not territorially relevant according to Article 7-bis of DPR 633/72.

18.1 SALE OF GOODS ONLY IF THERE IS A TRANSFER OF OWNERSHIP

The Revenue Agency reminds that an export sale occurs when goods are sent to a non-EU country under a free-on-board regime for subsequent sale to a foreign customer "based on a binding contractual commitment initially undertaken by the parties themselves" (see also Resolution No. 94 of 13.12.2013). In this context, the goods are "from the outset" conditioned "to the exclusive transfer of ownership to the foreign customer for its procurement needs."

18.2 CASE STUDY

In the case at hand, goods are transferred by an Italian taxpayer (Alfa) to a warehouse located in the USA, from where the storage operator takes the goods for subsequent sale to Alfa's customers, without assuming ownership.

Thus, the conditions are not met to consider the dispatch of the goods as conditioned by a subsequent transfer of ownership to the foreign customer for its procurement needs.

The sales made by Alfa in the USA lack the territorial requirement under Article 7-bis of DPR 633/73, as the transfer of ownership occurs "during their stay abroad" (C.M. 15.7.99 No. 156/E). Therefore, these sales must be documented with an "out of scope for VAT" invoice under Article 21, paragraph 6-bis of DPR 633/72.

19 PERMANENT ESTABLISHMENT IN ITALY - INTERVENTION ON SALES MADE IN ITALY - VAT TREATMENT

In response to request for clarification No. 33 of February 13, 2025, the Revenue Agency examined the conditions under which the intervention of a permanent establishment (PE) of a non-resident company in operations carried out in Italy can be considered "qualifying" for VAT application.

19.1 REGULATORY AND PRACTICAL FRAMEWORK

According to Article 53, paragraph 1 of EU Regulation No. 282 of March 15, 2011, two conditions must be met for the intervention of a permanent establishment to be considered "qualifying," meaning the PE must be characterized by:

- A "sufficient degree of permanence."
- An "adequate structure in terms of human and technical resources to enable it to supply goods or services in which it intervenes."

Furthermore, according to paragraph 2 of the same article, if a taxable person has a permanent establishment in the country where the tax is due, it is deemed that the PE does not participate "unless the technical or human resources of said permanent establishment are used" for operations related to the realization of the sale or service, "before or during the realization of such sale or service."

According to the administrative practice of the Revenue Agency (see responses to requests for clarification No. 52/2021 and No. 57/2023), the analysis must be conducted on a case-by-case basis.

19.2 CASE STUDY

Based on the facts examined in request for clarification No. 33/2025, it emerges that the activity carried out by the Italian permanent establishment includes both the pre-sale phase (market analysis, customer research, logistics consultancy, etc.) and the post-sale phase (assistance for defects, etc.).

Given these elements, the Revenue Agency considers the intervention of the permanent establishment in Italy as "qualifying," as the activities performed are deemed "related to the sale of goods" to the domestic customer and a "sign of sufficient autonomy" from the non-resident parent company.

Consequently, regarding the operations carried out in Italy:

- The permanent establishment is required to apply VAT by charging it on sales of goods to entities established within the territory of the state (the reverse charge mechanism does not apply).
- The non-resident parent company cannot recover the VAT via "direct" refund according to Article 38-bis2 of DPR 633/72, due to the performance of taxable operations in the state of refund.

20 TRAVEL AGENCIES - SPECIAL VAT REGIME - CARRYOVER OF "COST CREDIT" IN AN IVA GROUP

In response to request for clarification No. 24 of February 11, 2025, the Revenue Agency clarified that the "cost credit" accumulated by a taxable person applying the special VAT regime for travel agencies, under Article 74-ter of DPR 633/72, can be used in the year following its accumulation, even if the same person has since become part of an IVA Group.

20.1 CASE STUDY

The specific case involved a company operating in the flexible benefits market as a service aggregator, which also conducted activities under the special VAT regime for travel agencies as per Article 74-ter of DPR 633/72. This means the company applied VAT using the "base-to-base" deduction method instead of the "tax-on-tax" deduction method.

The company, in its annual return for 2023, highlighted a cost excess which, under the special rules (Article 6, paragraph 1, letter d of DM 340/99), could be carried over to the following year. However, in 2024, the company was included in an IVA Group. The question arose about the possibility of the Group using the excess, considering that Article 70-sexies of DPR 633/72 imposes specific limitations on the transfer of past excess deductible VAT to the single taxable person, for anti-avoidance purposes.

20.2 TRANSFERABILITY OF THE COST CREDIT TO THE IVA GROUP

The Revenue Agency clarified that the cost excess resulting from the application of the special VAT regime under Article 74-ter of DPR 633/72 represents a component in the calculation of the taxable base and does not constitute a transfer of an excess deductible VAT amount. Therefore, in the described case, the anti-avoidance rules do not apply.

Ultimately, the taxable base of operations carried out by the IVA Group within the (separate) travel agency activity will be determined by deducting the cost excess accumulated by the individual company in the year prior to joining the Group.

21 ECONOMIC EXPLOITATION OF A PATENT BY A FOUNDATION

In response to request for clarification No. 51 of February 28, 2025, the Revenue Agency clarified that for a foundation qualifying as a non-commercial entity with the institutional purpose of scientific research, the proceeds from the economic exploitation of patents related to the results obtained by its researchers, employees of the same foundation, are classified as "other income" under Article 67, paragraph 1, letter g) of the TUIR (Consolidated Income Tax Act).

In the specific case, when the employment relationship was established, the researcher committed to transferring the economic exploitation rights of the results of their research to the foundation, in exchange for the right to be recognized as the inventor and to receive appropriate financial compensation.

The fact that the economic exploitation of the patent is not carried out directly by the author but is obtained for consideration by the foundation means that the proceeds generated fall under the category of "other income."

Furthermore, if the foundation transfers the patent to a corporation, according to Article 9, paragraph 5 of the TUIR, the operation must be taxed, also as "other income," with the normal value of the transferred patent being considered as the income generated.

DEADLINE | **COMPLIANCE** | **COMMENT**

14.03.2025 | Update of the National Register of Amateur Sports Activities | Amateur sports associations and societies registered in the National Register of Amateur Sports Activities (RASD) as of 31.12.2024 must electronically submit a declaration regarding:

• the update of data provided during registration;

• the update of current administrators;

• data related to sports activities, including educational and training activities;

• any other changes that occurred in 2024.

This declaration is submitted to the RASD through the affiliated Sports Organization or, if not available, directly via the Register's platform.

15.03.2025 | Transmission of data for foreign purchases | VAT taxpayers, resident or established in Italy, must electronically transmit to the Revenue Agency, in XML format via the Exchange System: • data related to purchases of goods and services from entities not established in Italy; • regarding the documents proving the transactions received in February 2025 or transactions made in February 2025.

The communication does not apply to:

• transactions for which a customs bill or an electronic invoice has been received;

• purchases of goods and services not territorially relevant for VAT purposes in Italy under Articles 7 - 7-octies of DPR 633/72, provided that the amount does not exceed €5,000.00 per transaction.

16.03.2025 | Transmission of data for the transfer of tax credit or discount on payment for building interventions | Taxpayers, condominium administrators, or intermediaries must electronically communicate to the Revenue Agency, using the appropriate form, the option for the discount on payment

or the transfer of the tax credit, where still applicable, in relation to expenses incurred in 2024 for the following interventions:

• restoration of the building heritage;

• energy efficiency improvement;

• adoption of seismic measures;

• installation of photovoltaic solar systems;

• installation of charging stations for electric vehicles;

• removal of architectural barriers.

17.03.2025 | Certification of income from employment and short-term rentals | Withholding agents must deliver to the employees (e.g., employees, coordinated and continuous collaborators, professionals, agents, copyright holders, occasional workers, short-term rental income recipients, etc.) the certificate for the year 2024, which includes:

• the amounts and values paid;

• the withholding taxes applied;

• the tax deductions made;

• the social security contributions withheld.

The certificate must be issued using the "synthetic" form of the 2025 Unique Certification, approved by the Revenue Agency. Certificates no longer need to be issued for compensations paid to taxpayers under the flat-rate tax regime (art. 1, para. 54-89 of Law 190/2014) or the favorable tax regime (art. 27 of DL 98/2011, also known as "minimum taxpayers"). If the certificate for 2024 has already been issued using the 2024 Unique Certification form (e.g., at the request of the worker at the end of the employment relationship during 2024), it must be replaced by the new 2025 Unique Certification by the deadline.

17.03.2025 | Dividend Certification | Entities that, in 2024, distributed profits derived from shares in IRES entities, both resident and non-resident in the State, must deliver the appropriate certificate to the recipients, which includes:

• the dividends paid;

• the related withholding taxes applied.

The certificate is not required for profits subject to withholding tax as a final tax or a substitute tax.
The certificate must be issued using the appropriate CUPE form approved by the Revenue Agency's provision on 15.01.2019, No. 10663 (with instructions updated on 11.02.2021 and 18.12.2023).

17.03.2025 | Capital Gain Certification

Notaries, professional intermediaries, companies, and entities involved, even as counterparties, in transfers and other transactions that may generate financial income (so-called "capital gain") must issue a certificate to the parties for the transactions conducted in 2024.

The certification requirement does not apply if the taxpayer has opted for the "administered savings" or "managed savings" regime.
There is no specific form for this certification.

17.03.2025 | Other Certifications

Tax withholding agents must issue other certifications, related to 2024, concerning other income subject to withholding, different from the ones mentioned previously (e.g., interest from loans and other capital income).
The certification can be in a free format, as long as it certifies the amount:

• of the sums and values paid, both gross and net of any applicable deductions;
• of the withholdings made.

17.03.2025 | Electronic Submission of Unique Certifications

Tax withholding agents or authorized intermediaries must transmit the Unique Certifications for 2024 to the Revenue Agency electronically:

• using the “ordinary” model of the Unique Certification 2025, approved by the Revenue Agency;
• in compliance with the required technical specifications.

The electronic submission can be divided by separately sending, even by different subjects (e.g., labor consultant and accountant):
• the certifications for income related to dependent and assimilated employment;
• the certifications for income related to self-employment, commissions, miscellaneous income, and short-term leases.

Certifications no longer need to be transmitted for compensation paid to taxpayers under the flat-rate tax regime (art. 1, para. 54-89 of Law 190/2014) or the advantageous regime (art. 27 of DL 98/2011, so-called “minimally taxed taxpayers”).
If the Unique Certifications 2025 concern self-employment income related to the exercise of a habitual craft or profession by subjects other than the aforementioned flat-rate and minimal taxpayers, the transmission to the Revenue Agency can occur by 31.03.2025.
However, certifications containing only exempt income or income that cannot be declared through the precompiled tax return (i.e., income not reportable through the INDIVIDUALS’ INCOME model 2025, such as income related to non-individuals like commissions or fees paid by the condominium for contract work) can be submitted to the Revenue Agency by the deadline for submitting the 770/2025 form (31.10.2025).

17.03.2025 | "Telematic Location" Communication for 730/2025 Adjustments

Tax withholding agents must communicate the appropriate "telematic location" (their own, an intermediary's, or a group company's) to the Revenue Agency in order to receive the telematic flow containing the 730-4 forms, related to the adjustments resulting from the settlement of the 730/2025 forms.
The communication must be made:
• electronically;
• directly, or by using authorized intermediaries.

If this is the first communication (for withholding agents who have not yet communicated the "telematic location"), it must occur within the "CT Section" of the “ordinary” model of the Unique Certification 2025.
If changes need to be communicated, the appropriate "CSO" model, approved by the Revenue Agency with

provision no. 58168 dated 12.03.2019, must be used.
Withholding agents who have already received the 730-4 forms electronically from the Revenue Agency in previous years do not need to make this communication, unless changes to the previously provided data need to be communicated.

March 17, 2025: Transmission of data on expenses for interventions on common condominium areas

Condominium administrators must electronically communicate to the Revenue Agency, either directly or through authorized intermediaries, the data related to the expense quotas allocated to individual condominiums for expenses incurred by the condominium in 2024, with reference to:

- Interventions for the recovery of building heritage, energy requalification, seismic improvements, removal of architectural barriers, green space development, installation of photovoltaic solar panels, and charging stations for electric vehicles, carried out on the common parts of residential buildings;
- The purchase of furniture and large household appliances for the furnishing of the common parts of the property being renovated.

The communication is not required if, with reference to expenses incurred in 2024 for all interventions on common parts, all condominiums have opted, instead of using the tax deduction directly, for the assignment of the credit or a discount on the amount due.

March 17, 2025: Transmission of data on bank transfers for building recovery and energy requalification expenses

Banks, Poste Italiane, and payment institutions must electronically communicate to the Tax Registry the data related to bank transfers made in 2024 for the payment of expenses for:

- Building recovery interventions, which entitle the taxpayer to the IRPEF tax deduction;
- Energy requalification interventions on buildings, which entitle the taxpayer to the IRPEF/IRES tax deduction.

March 17, 2025: Transmission of data on veterinary expenses

Members of the Veterinary Professional Registers, or the individuals delegated by them, must electronically transmit:

- Data regarding veterinary expenses incurred in 2024 for animals legally kept for companionship or sporting purposes;
- To the Health Card System of the Ministry of Economy and Finance.

March 17, 2025: Transmission of data on mortgages

Entities that provide agricultural and real estate mortgages must electronically communicate to the Tax Registry, either directly or through authorized intermediaries:

- Data related to the year 2024 for interest payments and ancillary charges;
- In relation to all parties involved in the agreement.

March 17, 2025: Transmission of data on insurance contracts

Insurance companies must electronically communicate to the Tax Registry, through the Data Exchange System (SID):

- Data related to the year 2024 for deductible insurance premiums (e.g., life, death, and accident insurance contracts);
- In relation to all parties involved in the agreement.

March 17, 2025: Transmission of data on social security contributions

Social security institutions must electronically communicate to the Tax Registry, either directly or through authorized intermediaries:

- Data related to the year 2024 for social security and welfare contributions;
- In relation to all parties involved in the agreement.

March 17, 2025: Transmission of data on complementary pension plans

Complementary pension schemes must electronically communicate to the Tax Registry, either directly or through authorized intermediaries:

- Data related to contributions to complementary pension plans made in 2024, without the involvement of the tax substitute;
- In relation to all parties involved in the agreement.

March 17, 2025: Transmission of data on health expense reimbursements

Entities, mutual benefit societies with purely welfare purposes, and integrated funds of the National Health Service must electronically communicate to the Tax Registry, either directly or through authorized intermediaries:

- Data related to health expenses reimbursed in 2024, including those from previous years, due to contributions paid;
- Data on contributions paid in 2024, directly or through a party other than the tax substitute.

March 17, 2025: Transmission of data on funeral expenses

Entities performing funeral services and related activities must electronically communicate to the Tax Registry, either directly or through authorized intermediaries:

- The amount of funeral expenses incurred due to the death of individuals in 2024, with reference to each deceased person;
- Data of the deceased individual and the parties interested in the fiscal document.

March 17, 2025: Transmission of data on nursery school expenses

Nursery schools (public and private) and other entities receiving fees for nursery school attendance and child services must electronically communicate to the Tax Registry, either directly or through authorized intermediaries:

- Data related to expenses incurred by parents in 2024 for the payment of fees for nursery school attendance and child education services, with reference to each enrolled child;
- Data on refunds of fees paid in 2024, with reference to each enrolled child in the nursery school.

March 17, 2025: Transmission of data on school expenses

State schools, private accredited schools, and local authority schools must electronically communicate to the Tax Registry, either directly or through authorized intermediaries, the data:

- Related to deductible school expenses paid in 2024 by individuals, using methods other than the F24 form;
- In relation to each student.

The communication obligation also applies to entities providing reimbursements for school expenses, regarding reimbursements made in 2024 that are not included in the Single Certification.

March 17, 2025: Transmission of data on university expenses

State and non-state universities must electronically communicate to the Tax Registry, either directly or through authorized intermediaries:

- Data related to the year 2024 for university expenses incurred, net of any reimbursements and contributions;
- With reference to each student.

March 17, 2025: Transmission of data on university expense reimbursements

Entities that provide reimbursements for university expenses, other than universities and employers, must electronically communicate to the Tax Registry, either directly or through authorized intermediaries:

- Data on university expense reimbursements made in 2024;
- With reference to each student.

March 17, 2025: Transmission of data on charitable donations

Entities in the Third Sector registered with RUNTS, ONLUS, foundations, and recognized associations engaged in activities related to cultural and landscape heritage or scientific research, may (or must in certain cases) electronically communicate to the Tax Registry, either directly or through authorized intermediaries, the data on:

- Charitable donations in money received in 2024 from individuals, made via bank, post office, or other "traceable" payment systems, including the identification details of the donors;
- Charitable donations returned in 2024, with the details of the recipient to whom the refund was made.

March 17, 2025: Transmission of data on public transport subscription expenses

Public entities and private entities entrusted with public transport services may, on a voluntary basis, electronically transmit to the Tax Registry, either directly or through authorized intermediaries, the data on expenses for the purchase of subscriptions to local, regional, and interregional public transport services:

- Incurred in 2024 by individuals;
- Including identification details of the subscription holders and the individuals who paid the expenses (indicating the related tax code is not mandatory).

The communication option also applies to entities providing reimbursements for these subscription expenses, regarding reimbursements made in 2024 that are not included in the Single Certification.

March 17, 2025: Tax on book and register numbering and stamping

Capital companies must pay the annual government concession tax for the numbering and initial stamping of books and registers (e.g., journal book, inventory book), due at the flat rate of:

- €309.87 if the share capital or endowment fund does not exceed €516,456.90;
- Or €516.46 if the share capital or endowment fund exceeds €516,456.90.

The amount of the tax is independent of:

- The number of books and registers;
- The related pages.

March 17, 2025: Payment of VAT balance for 2024

Taxpayers who hold VAT numbers must pay the balance of the tax arising from the declaration for the year 2024 (VAT model 2025). However, the payment of the VAT balance can be deferred by all parties:

- By June 30, 2025, increasing the amount to be paid by interest of 0.4% for each month or fraction of a month after March 17;
- Or by July 30, 2025, increasing the amount to be paid, including the previous increase, with an additional 0.4% increase.

March 17, 2025: Monthly VAT payment

Taxpayers who are in the monthly VAT regime must:

- Settle VAT for the month of February 2025;
- Pay the due VAT.

Entities that outsource their accounting and have communicated this to the Revenue Agency can, when settling and paying VAT, refer to the VAT that became due in the second preceding month.

If the amount due, along with that of January 2025, does not exceed the threshold of €100.00, the payment can be made together with the payment for the following month.

Quarterly payment of VAT is possible, without interest application, for VAT on transactions resulting from subcontracting contracts, when the payment term was agreed to be after the delivery of the goods or the communication of the completion of the service.

March 17, 2025: Payment of Withholdings and Additional Taxes

Tax withholding agents must pay:

- The withholding taxes made in February 2025;
- The additional IRPEF (Personal Income Tax) withheld in February 2025 on wages and similar income.

Entities paying compensation for self-employment or commissions may not be required to pay the withholdings referred to in Articles 25 and 25-bis of DPR 600/73, by the deadline in question, if the cumulative amount of the withholdings made in January and February 2025 does not exceed €100.00.

The condominium paying for contracts for works or services may not be required to pay the withholdings referred to in Article 25-ter of DPR 600/73, by the deadline in question, if the cumulative amount of the withholdings made in January and February 2025 is less than €500.00.

March 17, 2025: Communication of Additional Data on Withholdings and Deductions in Replacement of the 770 Form

Tax withholding agents with no more than five employees as of December 31, 2024, may communicate to the Revenue Agency:

- Additional data on the withholdings and deductions made in February 2025 on income from employment or self-employment, or similar, paid through the F24 form, using the appropriate schedule approved by the Revenue Agency (provv. Agenzia delle Entrate 31.01.2025 n. 25978);
- In substitution of the presentation of the 770/2026 form for 2025.

Tax withholding agents using this option must:

- Apply it for the entire year 2025;
- Submit the F24 form and the additional schedule exclusively through the Revenue Agency's telematic services, either directly or through an authorized intermediary.

Transitionally, the additional schedule for withholdings and deductions made in February 2025 and paid by March 17, 2025, may be submitted to the Revenue Agency by April 30, 2025.

March 17, 2025: Payment of Tax Installments from the REDDITI PF 2024 Form

Individual taxpayers who are VAT-registered and have declared revenues or compensation not exceeding €170,000 in the 2023 tax year and who have opted for installment payments, starting from January 16, 2025, for the second or sole installment due for 2024 based on their income tax return, must make the following payment:

- The third of the five equal monthly installments;
- With interest applied at an annual rate of 4%.

March 17, 2025: Taxes on Amusement Devices

Operators of mechanical or electromechanical amusement and entertainment devices must pay the entertainment tax and VAT due:

- Based on the average annual lump-sum taxable amounts established for each category of devices;

- In relation to devices and machines installed before March 1st.

March 25, 2025: Submission of INTRASTAT Forms

Entities that have conducted intra-Community transactions must submit the INTRASTAT forms to the Revenue Agency:

- For the month of February 2025, either obligatorily or optionally;
- Through telematic transmission.

Entities that, in February 2025, have exceeded the threshold for the quarterly submission of INTRASTAT forms must submit:

- The forms for January and February 2025, specifically marked, either obligatorily or optionally;
- Through telematic transmission.

The Customs and Monopolies Agency Determination No. 493869 of December 23, 2021, approved the new INTRASTAT forms and introduced further simplifications for their submission, effective for the lists related to 2022.

March 31, 2025: Adherence to the 2018-2022 Corrective Regime Connected to the Two-Year Preventive Agreement

Taxpayers subject to ISA (Taxpayer Score) who adhered to the two-year preventive agreement by December 12, 2024, may opt for the corrective regime for the tax years 2018 to 2022, as per Article 2-quater of DL 113/2024. This regime provides limitations on assessment activities in exchange for the payment of a substitute tax on income taxes, related additional taxes, and IRAP (Regional Tax on Productive Activities).

Except for the provided exceptions, to adhere to the corrective regime, taxpayers must have applied the ISA for the tax years subject to the amnesty.

The substitute taxes due for each year must be paid using the F24 form:

- By March 31, 2025, in a lump-sum payment;
- Alternatively, through installment payments over a maximum of 24 equal monthly installments, starting from March 31, 2025, with interest calculated at the legal rate.

March 31, 2025: Conclusion of Insurance Policy Against Catastrophic Risks

Businesses with a legal headquarters in Italy or with a foreign legal headquarters and a stable organization in Italy, required to register in the Business Register pursuant to Article 2188 of the Civil Code, must enter into insurance coverage for damages related to:

- The assets listed in Article 2424, paragraph 1, Civil Code, section "Assets," items B-II, n. 1, 2, and 3 (land and buildings, plants and machinery, industrial and commercial equipment);
- Damages directly caused by natural disasters and catastrophic events occurring in Italy (earthquakes, floods, landslides, inundations, and overflow).

Agricultural businesses, as defined by Article 2135 of the Civil Code, are excluded from this requirement, as they are covered by the national mutual fund for meteorological and climatic catastrophic damage. For fishing and aquaculture businesses, the deadline to comply with this requirement is December 31, 2025.

March 31, 2025: Telecommunication of Single Certificates for Professionals

Substitute tax agents or authorized intermediaries must electronically transmit to the Revenue Agency the Single Certificates for 2024, which:

- Contain only income from self-employment related to habitual art or professional practice, excluding those paid to taxpayers who adopt the flat-rate regime (pursuant to Article 1, paragraphs 54-89 of Law 190/2014) or the advantageous regime (pursuant to Article 27 of Decree Law 98/2011, so-called "minimum taxpayers");
- Use the "ordinary" model of the Single Certificate 2025, approved by the Revenue Agency;
- Comply with the technical specifications provided.

March 31, 2025: Communication for Tax Credit on Investments in the ZES Unica Mezzogiorno

Businesses that wish to benefit from the tax credit for investments made from January 1, 2025, to November 15, 2025, in the ZES Unica for the Mezzogiorno (pursuant to Article 16 of Decree Law 124/2023, as extended by Article 1, paragraphs 485-491 of Law 207/2024), can begin submitting the appropriate communication to the Revenue Agency:

- Certifying the expenses incurred from January 1, 2025, and those expected to be incurred by November 15, 2025;
- Exclusively via telematic transmission, using the model approved by the Revenue Agency and the "ZESUNICA2025" software available on the relevant website;
- Either directly or through an authorized representative.

The final deadline for submitting the communication is May 30, 2025.

March 31, 2025: Communication for Tax Credit on Investments for Agricultural and Fishing Enterprises in the ZES Unica Mezzogiorno

Agricultural, fishing, and aquaculture businesses that wish to benefit from the tax credit for investments made from January 1, 2025, to November 15, 2025, in the ZES Unica for the Mezzogiorno (pursuant to Article 16-bis of Decree Law 124/2023, as extended by Article 1, paragraphs 544-546 of Law 207/2024), can begin submitting the appropriate communication to the Revenue Agency:

- Certifying the expenses incurred from January 1, 2025, and those expected to be incurred by November 15, 2025;
- Exclusively via telematic transmission, using the model approved by the Agency and the “ZES UNICA AGRICOLA 2025” software available on the relevant website;
- Either directly or through an authorized representative.

The final deadline for submitting the communication is May 30, 2025.

March 31, 2025: “EAS” Model

Private associative entities (except for specific exclusions, e.g., ONLUS) must submit the “EAS” model to the Revenue Agency:

- If there were any changes in 2024 compared to what was previously communicated;
- To benefit from non-taxability for VAT and IRES purposes on the fees, shares, and contributions.

The submission must be made:

- Via telematic transmission;
- Directly or through authorized intermediaries.

Exempt from this requirement:

- Third-sector entities registered with the RUNTS (Article 94, paragraph 4 of Legislative Decree 117/2017);
- Associations and amateur sports societies registered with the National Register of Amateur Sports Activities (Article 6, paragraph 6-bis of Legislative Decree 39/2021).

March 31, 2025: Submission of Applications for the "Advertising Bonus"

Businesses, self-employed workers, and non-commercial entities must submit via telematic transmission to the Department for Information and Publishing of the Presidency of the Council of Ministers, using the telematic services provided by the Revenue Agency, the communication:

- Regarding investments in advertising campaigns exclusively on daily and periodical press, including online, made or to be made in 2025;
- To benefit from the 75% tax credit for the incremental value of investments, provided they exceed at least 1% of similar investments made in 2024 on the same media.

March 31, 2025: Submission of Applications for the "Listing Bonus"

Small and medium-sized enterprises that listed on a regulated market in 2024 must submit the application:

- To benefit from the tax credit for consultancy costs incurred by December 31, 2024, related to the listing;
- To the Ministry of Enterprises and Made in Italy, via the PEC address dgind.div05@pec.mimit.gov.it, using the appropriate form and attaching the required documentation.

The chronological order of submission is not relevant.

March 31, 2025: Submission of Applications for the "Football Facilities Bonus"

Sports clubs and associations that benefited from the mutual funds of Serie A must submit an application to benefit from the tax credit for modernizing football facilities for 2024:

- To the Department for Sport of the Presidency of the Council of Ministers, via the certified email address ufficio-sport@pec.governo.it;
- Communicating the amounts received under Article 22 of Legislative Decree 9/2008 and the restructuring interventions carried out.

The chronological order of submission is not relevant.

March 31, 2025: Applications for Tax Credit for Assisted Negotiation, Mediation, and Arbitration Procedures

Entities that have paid fees for lawyers or arbitrators, or compensation for mediation bodies, must submit the application for the tax credit:

- For assisted negotiation procedures concluded successfully or for arbitration procedures concluded with a ruling in 2024;

- For civil and commercial mediation procedures, if the mediation agreement was reached in 2024;
- To the Ministry of Justice via the appropriate online platform accessible from the website www.giustizia.it.

March 31, 2025: Registration of Lease Contracts

Contracting parties must:

- Register new real estate lease contracts starting in March 2025 and pay the related registration tax;
- Pay the registration tax for renewals and annual leases starting in March 2025.

The registration must be done using the "RLI model," approved by the Revenue Agency on March 19, 2019, n. 64442. For tax payment, the "F24 with Identifying Elements" model (F24 ELIDE) must be used, specifying the appropriate tax codes created by the Revenue Agency.

March 31, 2025: VAT Declaration for the "IOSS" Regime

Taxpayers who have adhered to the special "IOSS" regime must electronically submit the declaration for February 2025 regarding distance sales of imported goods:

- Not subject to excise duties;
- Shipped in consignments with intrinsic value not exceeding 150.00 euros;
- Intended for a consumer in a European Union member state.

The declaration must be submitted even if there were no transactions under the regime. VAT due according to the declaration must also be paid by this deadline, based on the VAT rates of the member states where the sale is considered to occur.

March 31, 2025: Declaration for the "Tobin Tax"

Taxpayers who, in 2024, carried out transactions on financial instruments subject to the so-called "Tobin tax," without using banks, other financial intermediaries, or notaries, must submit the appropriate declaration to the Revenue Agency:

- Using the "FTT" model;
- Via telematic transmission.

If intermediaries were involved, the declaration must be submitted by them.