

Partner di



To whom it may concern

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INFORMATIVE

Insight

Subject: Tax incentives 2024 and 2025

A) Investment tax credit in capital goods 4.0 and 5.0

1) Interested Parties

- a) enterprises resident in the territory of the State of any legal form, economic sector they belong to, size and tax regime for determining the income of the enterprise;
- b) including permanent establishments of nonresidents;
- c) excluding enterprises in voluntary liquidation, bankruptcy, compulsory liquidation, arrangement with creditors without continuity of business or subject to other insolvency proceedings, recipients of prohibitory sanctions.

2) Investment type

- Investments 4.0

Investment in new tangible and intangible capital goods for production facilities located in the territory of the State.

- Tangible assets referred to in Annex A of Law 232/2016.
- Intangible assets referred to in Annex B of L. 232/2016.

- Investments 5.0

Investment in new tangible capital goods referred to in Annex A of L. 232/2016 intended for production facilities located in the territory of the State that contemplate energy efficiency compared to the previous year.

3) Deadline for making investments

- a) Investment 4.0: by 12/31/2025 ("long" deadline 6/30/2026).
- b) Investment 5.0: from 1/1/2024.

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4) Measure of tax credit

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Beni Materiali 4.0 (Allegato A)	Passaggio di proprietà dal 01/01/2024 al 31/12/2025 <small>(oppure entro il 30/06/2026, con prenotazione⁽¹⁾ entro il 31/12/2025)</small>
	20% + 20% se dotati di Certificazione Risparmio Energetico per investimenti fino a 2,5 milioni di euro
	10% + 20% se dotati di Certificazione Risparmio Energetico per investimenti da 2,5 a 10 milioni di euro
	5% + 20% se dotati di Certificazione Risparmio Energetico per investimenti da 10 a 20 milioni di euro
Beni Immateriali 4.0 (Allegato B)	Passaggio di proprietà dal 01/01/2024 al 31/12/2025 <small>(oppure entro il 30/06/2026, con prenotazione⁽¹⁾ entro il 31/12/2025)</small>
	10% per investimenti fino a 1 milione di euro

5) Availment of the tax credit

- Offset in 3 equal annual installments, starting from the year of attestation of interconnection by sworn appraisal.
- Sworn appraisal 4.0 and appraisal 5.0 issued by an engineer or industrial expert certifying compliance with specific technical and energy requirements.
Allowed alternatively certificate of conformity (or declaration of legal representative, but only for goods of unit acquisition cost \leq 300,000).
- Retention, under penalty of revocation of the benefit, of appropriate documentation to prove the actual incurrence and correct determination of the eligible costs.
- Indication of the standard in invoices and other documents related to the acquisition of the subsidized goods (with the possibility of ex post regularization).
- Compliance with workplace safety regulations applicable in each sector and proper fulfillment of obligations to pay social security and welfare contributions for workers.
- Reporting to MIMIT for information purposes.
Important: This is not a prior condition for access to benefits, nor, in the event of any failure to submit, cause for denial of the right to the benefits due.

6) Law and implementing decree

For the 5.0 tax credit, the establishing law has not yet been passed.

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B) R&D tax credit, Technological Innovation, Design and Aesthetic Ideation Tax Credit

1) Subjects involved

Enterprises resident in the territory of the state of any legal form, economic sector they belong to, size and tax regime for determining business income, including permanent establishments of nonresidents. Excluded are enterprises in voluntary liquidation, bankruptcy, compulsory liquidation, arrangement with creditors without continuity of business or subject to other insolvency proceedings, recipients of prohibitory sanctions.

2) Facilitated activities

- a) Fundamental research, industrial research and experimental development in science and technology (new elements compared to the sector);
- b) Technological innovation aimed at the realization of new or substantially improved products or production processes (new elements compared to the Company itself), including with the objective of transforming processes according to the principles of the circular economy or the 4.0 paradigm;
- c) Design and aesthetic conception aimed at significantly innovating the company's products in terms of form and other non-technical or functional elements (lines, contours, colors, surface texture, ornaments, ...).

3) Temporal scope of performance of subsidized activities

- a) From tax period 2024 to tax period 2025;
- b) The concessional measure is extended until 2025 and until 2031 for R&D activities only;
- c) The regulatory and procedural framework will remain virtually unchanged until 2025.

4) Eligible expenses

- a) Personnel
- b) Materials used
- c) Depreciation of industrial patents (R&D only)
- d) Depreciation and lease fees related to capital goods and software
- e) Consulting fees
- f) Expenses for commissioned work

5) Measure of tax credit

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	2023	2024-2025	2026-2031
R&S	10% Limite credito annuale: 5 milioni di euro	10% Limite credito annuale: 5 milioni di euro	10% Limite credito annuale: 5 milioni di euro
Innovazione Tecnologica	10% Limite credito annuale: 2 milioni di euro	5% Limite credito annuale: 2 milioni di euro	<p>Importante: per questi tre Cluster, il conteggio del limite massimo annuale va effettuato cumulativamente</p>
Innovazione Tecnologica Digitale 4.0	10% Limite credito annuale: 4 milioni di euro	5% Limite credito annuale: 4 milioni di euro	
Innovazione Tecnologica per la Transizione Ecologica	10% Limite credito annuale: 4 milioni di euro	5% Limite credito annuale: 4 milioni di euro	
Design e Ideazione Estetica	10% Limite credito annuale: 2 milioni di euro	5% Limite credito annuale: 2 milioni di euro	

6) Availment of the tax credit

- a) Offset in 3 equal annual installments, starting from the tax period following the accrual period.
- b) Sworn Technical Report, outlining the purpose, content, and results of eligible activities, prepared by the business manager of the activities or individual project or sub-project and countersigned by the legal representative.
- c) Retention of appropriate documentation to prove the actual incurrence and correct determination of eligible costs.
- d) Certification issued by the person in charge of the statutory audit.
- e) Compliance with workplace safety regulations applicable in each sector and proper fulfillment of obligations to pay social security and welfare contributions for workers.
- f) Reporting to MIMIT for information purposes.

Important: This does not constitute a prior condition for access to benefits nor, in the event of any failure to submit, cause denial of the right to the benefits due.

C) New patent box

1) Expenses

Incurred for the creation of intangible (invention patent, software source code, ornamental designs, utility model).

2) Relevant time

Tax period in which the fixed asset obtains an industrial patent title or registration in case of software.

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3) Tracking of costs

Expenses incurred in the previous 8 tax periods (past items that contributed to obtaining the intangible are dragged out).

D) New Sabatini Green

1) Subjects Affected

Micro, small and medium-sized enterprises that on the date of application:

- a) Are duly incorporated and registered in the Business Register or Fishing Business Register.
- b) Are in full and free exercise of their rights, are not in voluntary liquidation or subject to bankruptcy proceedings.
- c) They are not among those who have received and, subsequently, not repaid or deposited in a blocked account, aid considered illegal or incompatible by the European Commission.
- d) They are not in a condition to be a firm in difficulty.
- e) Are resident in a foreign country as long as they provide for the opening of an operating office in Italy by the deadline for the completion of the investment.

2) Investments

Purchase on ownership or lease of machinery, equipment, plant, capital goods for production use and hardware, as well as software and digital technologies.

3) Amount of contribution

Contribution with interest at the rate of 3.575% on loans with a term not exceeding 5 years until resources are exhausted.

The contribution is paid in several annual installments, except for loans of up to Euro 200,000 for which the contribution can be disbursed in one lump sum.

The Budget Law 2022 refinanced the New Sabatini for 900 million euros from 2022 to 2027.

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The Firm and Value Target remain available for any clarifications.

Kind Regards.

SGB & Partners – Commercialisti

Value Target