



To whom it may concern

Reggio Emilia, Jan. 14, 2025

MEMORANDUM N. 1/2025

Insight

Object: Budget Law 2025 - Major News

1 PREMISE

In O.S. No. 43 to O.J. No. 305, Dec. 31, 2024, Law No. 207 (Budget Law 2025) was published, effective Jan. 1, 2025.

2 MAIN CHANGES IN TAXATION AND FACILITATION

The following is a summary of the main innovations in tax and facilitation matters, contained in the 2025 budget law.

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Topic	Description
<p>IRPEF Reform - Modification of tax brackets, rates and deductions by types of income - Changes to the “treatment supplementary remuneration” - Making the provisions fully effective by 2024</p>	<p>The provisions on IRPEF reform provided for in Article 1 of Legislative Decree No. 216 of Dec. 30, 2023 for the 2024 tax period and concerning:</p> <ul style="list-style-type: none"> the reduction of taxable income brackets and related IRPEF rates from four to three; the modification of tax deductions for holders of employment income and certain assimilated income; the modification of the supplementary wage treatment for holders of employment income and certain assimilated incomes. <p>Reduction of taxable income brackets and IRPEF rates from four to three</p> <p>Through the substitution of co. 1 of Art. 11 of the TUIR, the reduction from four to three of the taxable income brackets and related IRPEF rates, already provided for the 2024 tax period, is confirmed when fully implemented.</p> <p>As of tax year 2025, the breakdown of taxable income brackets and IRPEF rates thus remains as follows:</p> <ul style="list-style-type: none"> up to 28,000 euros □ 23%; over 28,000 euro and up to 50,000 euro □ 35%; over 50,000 euros □ 43%. <p>Tax deduction for employment income and certain assimilated income</p> <p>Through the amendment of Art. 13 co. 1 lett. a) of the TUIR, the increase from 1,880 to 1,955 euros of the tax deduction for holders of employment income (excluding pensions) and certain assimilated incomes, with a total income not exceeding 15,000 euros, already provided for the tax period 2024, is confirmed at regime.</p> <p>Supplementary treatment for employment income and certain assimilated income</p> <p>Through the amendment to Art. 1 of Decree Law 3/2020, it is established as a matter of course that the amounts recognized as a “wage supplement,” for holders of employment income (excluding pensions) and certain assimilated income, with a total income not exceeding 15. 000 euros, are disbursed provided that the gross tax is higher than the amount of the deduction due under Article 13 co. 1 lett. a) of the TUIR, reduced by the amount of 75 euros related to the period of work in the year, as already provided for the tax period 2024.</p>
<p>IRPEF Reform - Adjustment of additional regional and municipal surcharges to the IRPEF</p>	<p>The deadline by which the regions, autonomous provinces of Trento and Bolzano and municipalities may establish differentiated rates of regional and municipal IRPEF surcharges, applicable for the 2025 tax year, is postponed to April 15, 2025:</p> <ul style="list-style-type: none"> on the basis of the “new” three IRPEF income brackets; or on the basis of the “old” four IRPEF income brackets (the possibility of maintaining the articulation of additional taxes on the basis of the “old” brackets is also provided for the years 2026 and 2027). <p>Failure to approve changes</p> <p>If new regional or municipal surtax rates are not approved by the established deadlines in relation to the “new” (or “old”) IRPEF income brackets, for the tax years 2025, 2026 and 2027 the regional or municipal surtax will be applied on the basis of the income brackets and rates already in force in each entity in the year preceding the year of reference.</p>
	<p>A new mechanism is provided for reducing the so-called “tax wedge” of employees, which will no longer be based on the exemption of the employee's share of IVS contributions, but will be tax-only with the recognition of a bonus or additional</p>

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<p>Measures to reduce the so-called “tax wedge”</p>	<p>deduction.</p> <p>Subjective Scope</p> <p>The bonus and the additional deduction concern holders of income from employment under Art. 49 of the TUIR, excluding holders of pension income of all kinds and allowances equated to them (under Art. 49 co. 2 lett. a) of the TUIR).</p> <p>Bonus</p> <p>The bonus is payable to workers with a total income not exceeding 20,000 euros and is determined by applying to the taxpayer's employment income the percentage of:</p> <ul style="list-style-type: none"> • 7.1%, if employee income is not more than 8,500 euros; • 5.3%, if employee income is more than 8,500 but not 15,000 euros; • 4.8%, if employee income is more than 15,000 euros. <p>For the sole purpose of identifying the applicable percentage, employee income is related to the entire year.</p> <p>The bonus does not contribute to the formation of income.</p> <p>Further deduction</p> <p>The additional deduction is due to employees with a total income between 20,000.01 and 40,000 euros.</p> <p>The additional deduction from the gross tax, related to the period of employment, is entitled to an amount equal to:</p> <ul style="list-style-type: none"> • to 1,000 euros, if the amount of total income is more than 20,000 but not 32,000 euros; • to the product of 1,000 euros and the amount corresponding to the ratio of 40,000 euros, less total income, to 8,000 euros, if the amount of total income is more than 32,000 but not 40,000 euros. <p>Mode of recognition</p> <p>The bonus and the additional deduction are recognized automatically by the tax withholding agents at the time of payroll disbursement.</p> <p>When making the adjustment, the tax withholding agents:</p> <ul style="list-style-type: none"> • verify the entitlement to the bonus and further deduction; • provide for the recovery of the bonus or additional deduction if they turn out not to be due (if the amount is more than 60 euros, the recovery is made in 10 equal installments starting from the first paycheck to which the effects of the adjustment apply). <p>The credit accrued as a result of the recognition of the bonus can be recovered by the tax withholding agents through the institution of offsetting in the F24 form referred to in Article 17 of Legislative Decree No. 241/97.</p> <p>Determination of total income and employment income</p> <p>For the purpose of determining total income and employment income, the exempt portion of income facilitated under:</p> <ul style="list-style-type: none"> • of Art. 44 co. 1 of DL 78/2010 (incentives for the return to Italy of researchers and teachers residing abroad); • of Art. 16 of DLgs. 147/2015 (special regime for impatriated workers); • of Art. 5 of DLgs. 209/2023 (new special regime for impatriate workers). <p>The total income is taken net of the income of the real estate unit used as a main residence and that of its appurtenances referred to in Art. 10 co. 3-bis of the TUIR.</p>
<p>IRPEF</p>	<p>As of Jan. 1, 2025, a number of changes are made to the rules governing IRPEF</p>

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<p>deductions for loads of family - Changes</p>	<p>deductions for family loads, as set forth in Article 12 of the TUIR.</p> <p>Abolition of deductions for dependent children over 30 years of age who are not disabled</p> <p>It is established that IRPEF deductions for children who are tax dependents are payable in relation to:</p> <ul style="list-style-type: none"> to children aged 21 or older but younger than 30, who are not disabled; to each child 21 years of age or older with a disability ascertained pursuant to Article 3 of Law No. 104 of 5.2.92. <p>In practice, IRPEF deductions for dependent children over 30 years of age who are not disabled are abolished, whereas previously there was no “maximum” age limit. It remains the case that IRPEF deductions do not apply for children under 21 years of age, as they are replaced by the single and universal allowance under Legislative Decree No. 230 of Dec. 29, 2021.</p> <p>It is confirmed that the tax deduction, subject to the stipulated requirements, also applies in relation to children born out of wedlock who are recognized and adopted, affiliated or foster children.</p> <p>Compared to the previous rules, the possibility of benefiting from the deduction is now also provided for children of the deceased spouse only, provided that they are cohabiting with the surviving spouse.</p> <p>Abolition of deductions for other dependents other than cohabiting ascendants</p> <p>It is stipulated that IRPEF deductions for other family members who are tax dependents, i.e., other than spouses who are not legally and effectively separated and children, will only accrue more in relation to each ascendant who cohabits with the taxpayer.</p> <p>In practice, IRPEF deductions are abolished in relation to other family members who are not ascendants (i.e., parents or grandparents), i.e., for example, legally and effectively separated spouse, brothers and sisters (including unilateral), sons-in-law and daughters-in-law, and father-in-law and mother-in-law.</p> <p>It also becomes indispensable that the ascendant cohabits with the taxpayer; previously, in fact, as an alternative to cohabitation it was possible to attest that the family member received maintenance payments not resulting from court orders.</p> <p>Abolition of deductions for non-EU citizens with family members abroad</p> <p>Deductions for fiscally dependent family members are no longer due:</p> <ul style="list-style-type: none"> to taxpayers fiscally resident in Italy who are not citizens of Italy or of a member state of the European Union or of a state party to the Agreement on the European Economic Area (Norway, Iceland and Liechtenstein); in relation to family members residing abroad. <p>Notification to the tax withholding agent of changes in family members for whom the deduction is taken</p> <p>For withholding purposes, employees, pensioners and holders of income assimilated to employees must promptly report to the withholding agent the details of family members for whom tax deductions are no longer due (e.g., non-disabled children over 30, other family members not living together, family members residing abroad).</p> <p>Failure to make this disclosure will result in the applicability of a penalty of 250 to 2,000 euros.</p> <p>In any case, the taxpayer is required to file an income tax return in order to return the increased undue deductions recognized by the withholding agent.</p>

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<p>Deductions IRPEF for charges - Expenses incurred from 1.1.2025 - Limitations based on total income and number of children dependents</p>	<p>The new Article 16-ter of the TUIR provides for a reorganization of deductions for expenses by providing for a new method of calculating tax deductions based on income and the number of fiscally dependent children in the same household.</p> <p>Subjective scope</p> <p>The changes apply:</p> <ul style="list-style-type: none"> to individuals only, with a total income exceeding 75,000 euros (nothing changes for individuals with a total income less than or equal to 75,000 euros). <p>Determination of total income</p> <p>The total income that is relevant is that which is obtained after deducting the income of the real estate unit used as the principal residence and that of its appurtenances.</p> <p>Objective scope</p> <p>The changes brought about by Article 16-ter of the TUIR concern “the charges and expenses for which this Consolidated Text or other regulatory provisions provide for a deduction from the gross tax, taken together,” incurred from 1.1.2025, with some exceptions.</p> <p>Thus, not only the deductions provided for in Article 15 of the TUIR are impacted by the new provisions, but in general all those provided for in the Italian tax system.</p> <p>Excluded charges</p> <p>Deductible expenses for which the new limit introduced by Article 16-ter of the TUIR is applicable do not include:</p> <ul style="list-style-type: none"> health care expenses facilitated under Art. 15 co. 1 lett. c) of the TUIR; the amounts invested in innovative start-ups, deductible under Articles 29 and 29-bis of DL 179/2012; the amounts invested in innovative SMEs, deductible under Art. 4 co. 9, second part, and co. 9-ter of DL 3/2015. <p>Interest expense of mortgages taken out until 12/31/2024</p> <p>Also not included among the deductible expenses for which the new limit introduced by Article 16-ter of the TUIR is applicable are:</p> <ul style="list-style-type: none"> interest expenses and other charges paid in connection with agricultural loans or mortgages contracted until Dec. 31, 2024, referred to in Art. 15 co. 1 lett. a) of the TUIR; interest on mortgages contracted until 12/31/2024 for the purchase of the main home (art. 15 co. 1 lett. b) of TUIR); interest expenses and other charges of mortgage loans contracted until Dec. 31, 2024 for the construction and building renovation of the real estate unit to be used as the main home (art. 15 co. 1-ter of TUIR). <p>Expenses incurred until 12/31/2024 with deduction used in multiple years</p> <p>Excluded from the new system of calculating deductions are all expenses incurred until Dec. 31, 2024 that allow benefiting from some benefit that is spread over several annual installments (e.g., expenses incurred until Dec. 31, 2024 for interventions aimed at the recovery of the building heritage, as per Art. 16-bis of the TUIR, for interventions for the energy requalification of buildings, as per Art. 14 of DL 63/2013, that allow benefiting from the so-called “ecobonus,” etc.).</p> <p>Insurance premiums taken out until 12/31/2024</p> <p>Deductible expenses for which the new limit introduced by Article 16-ter of the TUIR</p>

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	<p>applies do not include, when they depend on contracts concluded until Dec. 31, 2024:</p> <ul style="list-style-type: none"> • premiums for life, accident, death and permanent disability insurance (Art. 15 co. 1(f) of the TUIR);

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	<ul style="list-style-type: none"> • premiums for insurance for the risk of non-self-sufficiency (art. 15 co. 1 lett. f) of the TUIR); • premiums for insurance covering the risk of calamitous events taken out with respect to real estate units for residential use (art. 15 co. 1 lett. f-bis) of the TUIR). <p>Methods of calculating IRPEF deductions</p> <p>For expenses incurred from 1.1.2025, therefore, with the exceptions mentioned above, for individuals with a total income above 75,000 euros there are basically two limits:</p> <ul style="list-style-type: none"> • the one established by each facilitating regulation (which may consist of a certain maximum amount of expenditure or deduction as in the case of the ecobonus); • the new maximum expenditure limit introduced by the new Art. 16-ter of the TUIR and which affects almost all deductible expenses. <p>The new maximum expenditure limit is determined by multiplying the “base” amount of deductible expenses by a coefficient in relation to the number of children who are tax dependents (pursuant to Art. 12 co. 2 of the TUIR) present in the taxpayer’s household (children born out of wedlock who are recognized, adopted, fostered or affiliated, and who are tax dependents also count).</p> <p>The “base” amount is equal to:</p> <ul style="list-style-type: none"> • 14,000 euros, if the taxpayer's total income is more than 75,000 euros, but not more than 100,000 euros; • 8,000 euros, if the taxpayer's total income is more than 100,000 euros. <p>Given the irrelevance of any spouse, or other family members, who are tax dependents, the coefficient to be used that is to be multiplied to the limit of 14,000 or 8,000 euros is equal to:</p> <ul style="list-style-type: none"> • 0.50, if there are no tax dependent children in the household; • 0.70, if there is a tax dependent child in the household; • 0.85, if there are two tax-dependent children in the household; • 1, if there are more than two tax-dependent children or at least one tax-dependent disabled child in the household.

<p>Interventions of building recovery - Expenditures incurred from 1.1.2025 - Rates</p>	<p>In relation to the IRPEF deduction due for building heritage restoration work (the so-called “home bonus”) under Article 16-bis of the TUIR, the rate of the allowance has been remodeled (all other provisions remain unchanged, however).</p> <p>Rates for expenses incurred after 1.1.2025</p> <p>For owners (or holders of rights in rem) who use the real estate unit as their main home, the IRPEF deduction competes at the rate:</p> <ul style="list-style-type: none"> • of 50% for expenses incurred in 2025, up to the maximum subsidized expense limit of 96,000 euros; • of 36% for expenses incurred in the years 2026 and 2027, up to the maximum subsidized expenditure limit of 96,000 euros. <p>For all interventions carried out on real estate units other than the main dwelling, within the limit of subsidized expenditure not exceeding 96,000 euros per real estate unit, the</p>
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	<p>rate is set at:</p> <ul style="list-style-type: none"> • 36% for expenses incurred in 2025; • 30% for expenses incurred in 2026 and 2027. <p>Replacement of emergency generator set with 50% tax rate</p> <p>Pursuant to Article 16-bis para. 3-bis of TUIR, the deduction continues to apply to the extent of 50 percent (thus also for expenses incurred from 1.1.2025) for interventions to replace the existing emergency genset with state-of-the-art gas-fired emergency generators.</p>

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Topic	Description
	<p>Fossil fuel-fired boilers</p> <p>As of 1.1.2025, expenses incurred for the replacement of winter air conditioning systems with single boilers powered by fossil fuels are no longer eligible for the relief provided by Article 16-bis of the TUIR.</p> <p>The exclusion is necessary to implement EU Directive 24.4.2024 No. 1275 (so-called “Case green”).</p>
<p>Interventions of reduction of seismic risk (sismabonus) - Interventions of energy requalification (ecobonus) - Expenses incurred from 1.1.2025 - Rates</p>	<p>The rates of the IRPEF/IRES deduction due for interventions aimed at the energy requalification of buildings, as per Art. 14 of DL 63/2013 (so-called “ecobonus”) and that due for interventions aimed at the reduction of seismic risk, as per the subsequent Art. 16 co. 1-bis ss. (so-called “sismabonus”), are substantially aligned with those provided for building recovery interventions, as per Art. 16-bis of TUIR.</p> <p>Rates for expenses incurred after 1.1.2025</p> <p>The “ecobonus” and “seismbonus” (including the so-called “purchase seismbonus”), in particular, are extended in the following measures:</p> <ul style="list-style-type: none"> for main dwellings, the rate is 50% for expenses incurred in 2025, while it drops to 36% for those incurred in the years 2026 and 2027; for real estate units other than the main dwelling, the rate is 36% for expenses incurred in the year 2025 and 30% for those incurred in the years 2026 and 2027. <p>Fossil fuel-fired boilers</p> <p>As of Jan. 1, 2025, expenses incurred for the replacement of winter air conditioning systems with single boilers powered by fossil fuels are also no longer eligible for the “ecobonus,” as per Article 14 of Decree Law 63/2013.</p>
<p>Superbonus - Expenses incurred in 2025 - Additional requirements</p>	<p>New changes have been introduced for the superbonus, referred to in Art. 119 of LD 34/2020.</p> <p>Additional requirements to benefit from the 65% rate</p> <p>For expenses incurred in 2025, the superbonus at the rate of 65% provided for “by paragraph 8-bis first sentence” of Art. 119 can compete only if on 15.10.2024:</p> <ul style="list-style-type: none"> the CILA-S, referred to in Art. 119 co. 13-ter of DL 34/2020, for interventions other than those carried out by condominiums is submitted; not only the CILA-S has been submitted, but also the assembly resolution approving the execution of works has been adopted, for interventions carried out by condominiums; the application for the acquisition of the permit is submitted, if the interventions involve the demolition and reconstruction of buildings. <p>The aforementioned additional requirements do not affect the special regimes that maintain the 110% rate even on 2025, namely the “special discipline superbonus seismic events at 110% until the end of 2025” recited in co. 8-ter of Art. 119 of DL 34/2020 and the “special discipline RSA” referred to in co. 10-bis of the aforementioned Art. 119.</p> <p>Expenses incurred in 2023 “spread” over 10 years</p> <p>It is allowed to “spread” in 10 annual installments (instead of four) the superbonus (of 90 percent or 110 percent, as the case may be) that accrues in relation to expenses incurred in 2023.</p> <p>The “10-year spread” option is irrevocable and must be exercised in the supplementary tax return of the one submitted for the 2023 tax period (730/2024 and REDDITI PF 2024 that were due by Oct. 31, 2024).</p>

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	<p>Such supplementary return (referring to the year 2023) may be submitted, notwithstanding Article 2 co. 8 of Presidential Decree 322/98, by the deadline for the submission of the tax return for the tax period 2024.</p> <p>In the event that the supplementary return reveals a higher tax liability, moreover, the excess may be paid “without application of penalties and interest, by the deadline for the payment of the balance of income taxes for the tax period 2024.”</p>
Furniture Bonus - Extension for 2025	<p>The so-called “furniture bonus,” referred to in Art. 16 co. 2 of DL 63/2013, is extended for the year 2025 as well, keeping its rules unchanged.</p> <p>Therefore, for the purchase of furniture and large household appliances (with certain characteristics) aimed at furnishing “the property under renovation,” a 50 percent IRPEF deduction is due for expenses incurred from 6.6.2013 to 31.12.2025.</p>
Bonus home appliances	<p>A subsidy for the purchase of household appliances is recognized for the year 2025, provided for the benefit of end users if at the same time:</p> <ul style="list-style-type: none"> the household appliance purchased is highly energy efficient (not less than the new energy class B) and is manufactured in the territory of the European Union; there is the simultaneous disposal of the replaced household appliance. <p>Measure of the contribution</p> <p>The contribution is for the purchase of a single household appliance, and may be granted, within the limit of the allocated resources:</p> <ul style="list-style-type: none"> to an extent not exceeding 30% of the purchase cost of the household appliance; in any case for an amount not exceeding 100 euros for each household appliance, raised to 200 euros if the purchaser's household has an ISEE of less than 25,000 euros annually. <p>Implementation provisions</p> <p>A subsequent Ministerial Decree will define the criteria, methods and terms for the disbursement of the contribution.</p>
Expenses schooling - Limit of deductibility IRPEF - Increase from 1.1.2025	<p>The maximum limit of expenses incurred for children's school attendance eligible for the 19% IRPEF deduction under subparagraph e-bis) of art. 15 co. 1 of the TUIR is raised to 1,000 euros.</p> <p>The deduction applies in relation to the costs of attendance:</p> <ul style="list-style-type: none"> Of preschools (kindergartens or “old” kindergartens); of the first cycle of education, that is, of elementary school (“old” elementary schools) and secondary schools (“old” middle schools); of secondary schools (“old” high schools). <p>Deductible expenditure limit at 19%</p> <p>In relation to each pupil or student, the 19% IRPEF deduction, to be apportioned among those entitled, is applied on an annual amount not exceeding:</p> <ul style="list-style-type: none"> 1,000 euros, beginning in the year 2025; 800 euros, beginning in the year 2019 and ending in 2024.
Guide dogs - Increase deduction flat rate	<p>The flat-rate amount of the deduction due to the blind for the maintenance of guide dogs provided for in Article 15 co. 1-quater of the TUIR is increased to 1,100 euros (until 2024 it was 1,000 euros).</p>
Fringe benefits	<p>The threshold for non-taxable fringe benefits for the years 2025, 2026 and 2027 is</p>

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2025, 2026 and 2027 - Increase of the threshold exemption	<p>raised from 258.23 euros to:</p> <ul style="list-style-type: none"> 1,000 euros, for all employees; 2,000 euros, for employees with tax dependent children only. <p>Also included in the above limit, for all employees (with or without children for tax purposes), are the amounts paid or reimbursed by the employer for the payment</p> <ul style="list-style-type: none"> of household utilities of integrated water service, electricity and natural gas; of expenses for renting the first home or for interest on the mortgage related to the main home.

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Cars granted mixed use to employees	<p>For newly registered vehicles granted for mixed use to employees with contracts signed from 1.1.2025, the fringe benefit is calculated as follows:</p> <ul style="list-style-type: none"> 50% of the amount corresponding to a conventional annual mileage of 15,000 km, calculated on the basis of the mileage cost of operation inferable from the national tables prepared by ACI; 20% of the above amount in the case of plug-in hybrid electric vehicles; 10% of the above amount in the case of battery-powered vehicles with exclusively electric traction.
Buildings leased to newly hired employees transferred	<p>Amounts disbursed or reimbursed by employers for the payment of rents and maintenance expenses of buildings leased by employees hired on a permanent basis in 2025 do not contribute, for the first 2 years from the date of hiring, to income for tax purposes within the overall limit of 5,000 euros per year.</p> <p>This provision applies to individuals:</p> <ul style="list-style-type: none"> holders of employment income not exceeding 35,000 euros in the year preceding the date of hiring; who have transferred their residence to a work municipality located more than 100 km away from their previous municipality of residence.
Reduction tax substitute tax on performance bonuses	<p>The substitute tax on IRPEF and regional and municipal surtaxes on performance bonuses, provided for in Art. 1 co. 182 of Law No. 208 of Dec. 28, 2015, is also reduced from 10 percent to 5 percent for bonuses and amounts paid in the years 2025, 2026 and 2027.</p>
Changes to the tax substitute tax on tips in the hotel and catering	<p>The rules on the 5% substitute tax on tips received by personnel employed in the hospitality and food and beverage sector, introduced by Art. 1 co. 58 - 62 of Law 197/2022, are amended.</p> <p>Specifically, it provides for:</p> <ul style="list-style-type: none"> the increase from 25% to 30% of the limit within which tips can be subject to substitute tax instead of ordinary taxation. In essence, the substitute tax is applied within the limit of 30 percent of employee income received in the year for services rendered in the above sectors; the raising from 50,000 to 75,000 euros of the income limit, compliance with which is necessary to access the tax break on tips. Thus, in order to benefit from the substitute tax, the employee must have an income from employment of no more than 75,000 euros in the tax period preceding that in which the tips to be subject to substitute tax are received.
Tax substitute tax on nurses' overtime	<p>A 5% substitute tax on IRPEF and regional and municipal surtaxes is introduced to be applied on compensation:</p> <ul style="list-style-type: none"> for overtime work referred to in Article 47 of the collective bargaining

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Topic	Description
	<p>agreement of the health sector for the three-year period 2019-2021 (stipulated on 2.11.2022 and published in the Official Gazette No. 19, S.O. No. 5, 24.1.2023);</p> <ul style="list-style-type: none"> disbursed to nurses employed by companies and institutions of the National Health Service. <p>Effective date</p> <p>The substitute tax is applied by the withholding agent to compensation paid from the year 2025 onward (compensation paid by 12.1.2025 but referring to 2024 is excluded from the application of the substitute tax).</p> <p>Provisions related to assessment</p> <p>The provision stipulates that for assessment, collection, penalties and litigation, the provisions on income tax shall apply mutatis mutandis.</p>
<p>Regime of wages conventional with return weekly</p>	<p>In an authentic interpretation rule, it is clarified that income from employment performed abroad by employees who stay in the foreign state for a period exceeding 183 days “returning to Italy to their domicile once a week” can also benefit from the conventional wage regime, as per Art. 51 co. 8-bis of the TUIR. In other words, the weekly return to the domicile would not break the continuous nature of the employment relationship in the foreign state.</p>
<p>Working from home for frontier workers in Switzerland</p>	<p>Pending the entry into force of the Protocol of Amendment to the Italy-Switzerland Agreement of Dec. 23, 2020, border workers (including those who avail themselves of the transitional regime under Article 9 of the same Agreement), may, in the period between Jan. 1, 2024 and the date of entry into force of the aforementioned Protocol, carry out salaried activities in telework mode for up to 25 percent of their activity without the loss of their border worker status.</p>
<p>Treatment taxation of compensation to employees in the equestrian industry</p>	<p>As of 1.1.2025, compensation paid to those responsible for the control and regulation of horse racing and saddle horse events authorized for the purpose of sports betting, registered in the register kept by the Ministry of Agriculture, Food Sovereignty and Forestry (art. 50 co. 1 lett. l-bis) of the TUIR constitute income assimilated to that of employees).</p> <p>Exempt threshold</p> <p>Compensation received by such figures constitutes income for the portion that exceeds a total of 15,000 euros in the tax period.</p>
<p>Cause of exclusion from the flat-rate scheme</p>	<p>The flat-rate scheme for sole proprietors and self-employed workers is not applicable if income from employment and similar income, referred to in Articles 49 and 50 of the TUIR, exceeding the amount of 30,000 euros is received. The period to be considered for the calculation of the limit is the year preceding the year in which one intends to enter or remain in the scheme.</p> <p>For the year 2025 only, this threshold is increased to 35,000 euros.</p> <p>Therefore, to use the scheme in 2025, income received in 2024 must be considered; where the 35,000 euro limit is exceeded, the person cannot apply the scheme for 2025.</p>
	<p>The scheme that provides for the redetermination of the tax cost of equity investments (listed and unlisted) under Article 5 of Law 448/2001 and land (agricultural and building) under Article 7 of Law 448/2001 is stabilized.</p> <p>Through the payment of the substitute tax, therefore, individuals, simple companies, noncommercial entities and nonresident individuals without a permanent establishment in Italy will be allowed to revalue the cost or purchase value of the shareholdings and land owned as of January 1 of each year outside the scope of the business, franking all or part of the capital gains obtained, pursuant to Art. 67 co. 1 lett. a) - c-bis) of the</p>

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Topic	Description
<p>Stabilization of the restatement of the tax cost of land and equity investments (listed and unlisted)</p>	<p>TUIR, when the shareholdings or land are sold for consideration.</p> <p>Modalità di rivalutazione</p> <p>For holdings and land owned as of January 1 of each year, the deadline for putting in place the necessary formalities becomes the following November 30, and for the transaction to be completed it will be necessary that</p> <ul style="list-style-type: none"> • a licensed professional (e.g., certified public accountant, engineer, etc.) prepare and asseverate the appraisal of the unlisted equity interest or land; • the taxpayer concerned pays the substitute tax in full, or (in case of installment) the first installment thereof. <p>On the other hand, without prejudice to the deadline for payment of the substitute tax, for listed shareholdings held as of January 1 of each year, the possibility is provided to assume, instead of the cost or purchase value, the normal value determined on the basis of the arithmetic average of the prices recorded in the month of December of the previous year pursuant to Article 9, para. 4, letter a) of the TUIR.</p> <p>Payment of the substitute tax</p> <p>From the year 2025, the restatement of the tax cost of equity investments (listed and unlisted) and land involves the application of substitute tax at a single rate of 18%</p> <p>Payment of the substitute tax</p> <p>The 18% substitute tax must be paid:</p> <ul style="list-style-type: none"> • in full, by November 30 of the year of the revaluation; • or, in the case of an option to pay in installments, in three annual installments of equal amount; the installments following the first one shall bear interest at 3% per annum, starting on November 30 of the reference year. <p>The redetermination of the tax cost of land and holdings is completed with the payment, by November 30, of the total substitute tax due or the first installment.</p>
<p>News on the regime of taxation of crypto-assets</p>	<p>The tax burden on crypto-assets is tightened, stipulating that on capital gains and other income referred to in Art. 67 co. 1 lett. c-sexies) of the TUIR realized from 1.1.2026, the substitute tax applies at the rate of 33 percent.</p> <p>Other novelties include the elimination of the income exemption of 2,000 euros and the reintroduction of a transitional franking regime, with substitute tax of 18%, as of 1.1.2025.</p> <p>New rate of 33%</p> <p>On capital gains and other income referred to in Art. 67 co. 1 lett. c-sexies) of the TUIR, realized from 1.1.2026, “the substitute tax referred to in Articles 5, and 6 and 7 of Legislative Decree No. 461 of November 21, 1997, shall be levied at the rate of 33 percent.”</p> <p>For 2025, the levy thus remains at 26 percent.</p> <p>As for the effectiveness of the amendments, taking a cue from what was pointed out in Circ. Agenzia delle Entrate Circ. 27.10.2023 No. 30 (§ 3.2) on the transitional regime of capital gains and losses before 2023, it is considered that the date on which the transaction is carried out applies, regardless of its financial settlement (transactions carried out by Dec. 31, 2025, therefore, would still be taxed at the 26 percent rate, even if the consideration is received in 2026 and the taxable moment is located in 2026).</p> <p>Elimination of the 2,000-euro deductible</p> <p>The 2,000-euro deductible on miscellaneous income from crypto-assets was provided for in the original regulations introduced by Law 197/2022 (Budget Law 2023).</p> <p>The rule provided that capital gains and other income realized through redemption or</p>

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Topic	Description
	<p>sale for consideration, exchange or holding of crypto-assets, however denominated, pursuant to Art. 67 co. 1 lett. c-sexies) of the TUIR, were not subject to taxation if less than, in the aggregate, 2,000 euros in the tax period.</p> <p>With the elimination of this exemption, there will be a need to file tax returns even for taxpayers who realize tiny capital gains. In fact, it appears that it will be enough to realize a capital gain of 1 euro to trigger the reporting requirement.</p> <p>It seems that this novelty will come into effect from capital gains on crypto-assets that are realized from 1.1.2025.</p> <p>Redetermination of the value of crypto-assets</p> <p>The tax cost redetermination scheme is reintroduced through the payment of a substitute tax of 18 percent for crypto-assets held as of 1.1.2025 (the 2023 franking provided for a 14 percent rate).</p> <p>According to what was clarified by Internal Revenue Service Circ. 30 dated Oct. 27, 2023 (§ 3.6), which had commented on the 2023 enfranchisement, the new regime will also be able to apply to “each crypto-asset” held; thus, if the taxpayer held 10 bitcoins and 20 ethers and decided to revalue the bitcoins, the revaluation had to apply to all 10 bitcoins held. Also according to Circular 30/2023 (§ 3.6), in addition, only crypto-assets for which tax monitoring obligations had not been violated can be franked.</p> <p>For franking parties, the normal value of the assets under consideration as of 1.1.2025, subject to the 18 percent substitute tax for these purposes, will be taken instead of the cost or purchase value.</p> <p>For the purposes of finalizing the option, the substitute tax must be paid in a lump sum, by Nov. 30, 2025, or alternatively in up to three equal annual installments, with interest of 3% per annum on the installments following the first.</p>
<p>IRES premium</p>	<p>For 2025 only, a reduction in the IRES rate from 24% to 20% on reported business income is provided for companies that meet the following conditions:</p> <ul style="list-style-type: none"> • allocation to reserves of a minimum of 80% of profits for the year 2024; • investment of a portion of these earmarked profits (in any case not less than 20,000 euros) in the purchase, including through leasing, of new capital goods 4.0 and 5.0; • making new hires of permanent employees, with an increase in employment.
<p>Super-deduction for new hires</p>	<p>Provision is made for the extension for 2025, 2026 and 2027 of the super-deduction for new permanent hires under Art. 4 of LD 216/2023.</p>
<p>Deductibility of costs from stock option plans</p>	<p>A new co. 6-bis is introduced in Art. 95 of the TUIR, specifying that the tax deduction of the cost accounted for in connection with employee stock option plans is made when the financial instruments are actually granted.</p> <p>In essence, compared to when the cost is recognized in the income statement, i.e., on the date of the plan's resolution, the rule defers the deduction of the cost until the options granted are exercised.</p> <p>In this way, not only is the deduction of the cost made to coincide with the occurrence of the IRPEF taxable assumption in the hands of the beneficiary, but the right to deduct the expense is also permanently compressed whenever the plan is not perfected as a result of market conditions that make it unprofitable for the beneficiaries.</p> <p>Effective date</p> <p>The new rules for the deductibility of stock option plans by IAS/IFRS entities apply to plans whose expenses are recognized for the first time in the financial statements for</p>

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Topic	Description
	<p>the fiscal year current as of Dec. 31, 2025 or later.</p> <p>The Explanatory Memorandum to the Budget Bill 2025 specifies that these are plans started as of the current fiscal year as of 12/31/2025.</p> <p>Deductibility of the charge for OIC-adopters</p> <p>According to the Explanatory Report to the Budget Bill 2025, for reasons of systematic consistency, Art. 95 co. 6-bis of the TUIR also applies for entities that adopt national accounting standards in their financial statements and represent the transactions under consideration with the rules contained in IFRS 2, in view of the provisions of the OIC 11 document.</p> <p>In fact, in application of the OIC 11 document (§ 4), where an international accounting standard complies with the postulates set forth in the same OIC 11 document and there are no other OICs applicable by analogy, that IAS or IFRS can be taken as a reference by the financial statement preparer in establishing an appropriate accounting policy on a case-by-case basis.</p> <p>In essence, it seems possible to apply the new provisions even for OIC-adopters who, as permitted by OIC 11, use IFRS 2 to account for the transactions in question.</p>
<p>Facilitated assignment of assets to shareholders and transformation into a simple partnership</p>	<p>The deadlines for carrying out the following transactions have been reopened:</p> <ul style="list-style-type: none"> • assignment and facilitated transfer to partners of real estate (with the exception of those instrumental by destination) and registered movable property (e.g., cars) that are not instrumental; • transformation into a simple company of companies, either partnerships or corporations, whose exclusive or main purpose is the management of the aforementioned assets. <p>The tax benefits apply to transactions put in place by 9/30/2025.</p> <p>Substitute taxes</p> <p>The tax benefits take the form of:</p> <ul style="list-style-type: none"> • in the substitute taxation of 8% (10.5% for companies found to be shell companies for at least 2 years in the three-year period 2022-2024) on the capital gains realized on assets assigned to shareholders, or destined for purposes outside the company's business following the transformation; • in the substitute taxation of 13% on tax-suspension reserves cancelled as a result of the facilitated transactions. <p>For the determination of the taxable base of the 8% substitute tax, it is possible to take their cadastral value instead of the normal value of real estate.</p> <p>The companies concerned are required to pay the substitute tax due:</p> <ul style="list-style-type: none"> • 60 percent by 9/30/2025; • for the remaining 40% by 30.11.2025. <p>Indirect taxes</p> <p>In the context of facilitated transactions, proportional registration im-tax rates are reduced by half and mortgage and cadastral taxes are payable at a fixed rate.</p>
<p>Facilitated ouster Of the property of the sole proprietor</p>	<p>The facilitating discipline of the ouster of the sole proprietor's capital property, which allows the property to be transitioned from the entrepreneurial sphere to the personal sphere with reduced taxation, has been reopened.</p> <p>Subjective scope</p> <p>Entrepreneurs who are in business are eligible for the benefits:</p> <ul style="list-style-type: none"> • either as of 10/31/2024;

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Topic	Description
	<ul style="list-style-type: none"> • or as of 1.1.2025 (the date to which the effects of the ouster are referred). <p>Objective Scope</p> <p>The subsidized ouster covers real estate that is instrumental by nature and real estate that is instrumental by purpose. Facilitated real estate:</p> <ul style="list-style-type: none"> • must be owned as of Oct. 31, 2024 and on that date present the requirement of instrumentality; • must also be owned as of 1.1.2025. <p>Substitute tax</p> <p>The favorable regime under comment provides for:</p> <ul style="list-style-type: none"> • the subjecting of the capital gain resulting from the ouster to a substitute tax of 8 percent; • the possibility of determining the capital gain by assuming, instead of the normal value of the property, its cadastral value. <p>Fulfillments</p> <p>For the purposes of the benefits under consideration:</p> <ul style="list-style-type: none"> • the transaction must take place between 1.1.2025 and 31.5.2025, including through conclusive behavior (e.g., notation in accounting records); • 60% of the substitute tax must be paid by 30.11.2025 and the remaining 40% by 30.6.2026.

Topic	Description
<p>Changes to the transitional of deductibility of write-downs and losses on loans of banks and insurance companies</p>	<p>The transitional regime for deductibility, for IRES and IRAP purposes, of loan losses of banks, finance companies and insurance companies, which has already been subject to some changes in recent years, is again modified.</p> <p>Nothing changes, however, for mercantile, industrial and service companies other than banks and insurance companies.</p> <p>In detail, the deferral is established, on a straight-line basis:</p> <ul style="list-style-type: none"> • to the tax period in progress as of Dec. 31, 2026 and the following three (in practice, from 2026 to 2029 for those with a “solar” fiscal year), the deduction of the 11 percent share provided for the tax period in progress as of Dec. 31, 2025; • to the tax period in progress as of 12/31/2027 and the following two (in practice, from 2027 to 2029 for individuals with “solar” fiscal year), of the deduction of the 4.7% share provided for the tax period in progress as of 12/31/2026. <p>Counting down tax losses and ACE surpluses</p> <p>Tax losses and ACE surpluses are deducted from the higher taxable income of the tax period in progress as of Dec. 31, 2025, determined as a result of the aforementioned deferral of allowances, to an extent not exceeding 54 percent of the same higher taxable income.</p> <p>The limitations also apply for the purpose of determining the income of parties participating in the domestic and worldwide consolidation under Articles 117 ff. of the TUIR.</p>
<p>Changes to the deductibility of expected credit losses at the of first application of</p>	<p>The deductibility percentages of income components arising from the adoption of the expected loss model on loans to customers, recorded in the financial statements upon the first-time adoption of IFRS 9, were changed.</p> <p>Specifically, the deduction of the 10% portion provided for the tax period in progress as of Dec. 31, 2025, and the following tax period (2025 and 2026, for “solar” entities) was</p>

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Topic	Description
IFRS 9	<p>deferred on a straight-line basis, respectively:</p> <ul style="list-style-type: none"> to the tax period in progress as of 12/31/2026 and the following three (2026 to 2029, for “solar” persons); to the tax period in progress as of 12/31/2027 and the following two (from 2027 to 2029, for “solar” subjects).
<p>Changes to the deductibility of goodwill and other intangible assets that have resulted in the recognition of DTAs</p>	<p>The deductibility regime of prior amortization allowances (i.e., not yet deducted until the tax period in progress as of 12/31/2017) related to the value of goodwill and other intangible assets that have given rise to the recognition of deferred tax assets (DTAs) to which the rules on transformation into tax credits apply is again modified. Specifically, the deduction of the portions provided for the tax periods ending 12/31/2025 and 12/31/2026 is deferred.</p> <p>As a result of the amendments, deductibility (for IRES and IRAP purposes) is provided in the following measures:</p> <ul style="list-style-type: none"> 0% for the current tax period as of 12/31/2025; 3.25% for the tax period in progress as of 12/31/2026; 20.58% for the tax period ending 12/31/2027; 13.58% for the tax period ending 12/31/2028; 13.59% for the tax period ending 12/31/2029. <p>The depreciation allowances provided prior to 1.1.2019 remain unaffected if they are smaller in amount than those restated under this provision; in such case, the difference (between the previous and the restated depreciation allowances) is deductible in the current tax period as of 12.31.2029.</p> <p>Scope of application</p> <p>The discipline on the transformation of DTAs into tax credits was originally introduced by DL 29.12.2010 No. 225 (conv. L. 26.2.2011 No. 10) to encourage the capitalization of banks and financial intermediaries and has been subsequently amended/supplemented several times.</p> <p>Res. Revenue Agency No. 94, Sept. 22.9.2011 clarified that the provision can also be applied by IRES entities other than credit and financial institutions.</p> <p>DL 27.6.2015 No. 83 (conv. L. 6.8.2015 No. 132) excluded the possibility of transforming deferred tax assets related to the value of goodwill and other intangible assets into tax credits, with reference to DTAs recorded for the first time starting from the 2015 financial statements (for “solar” entities).</p> <p>The discipline of transformation into tax credits continued, therefore, to apply only with reference to the stock of DTAs accumulated until 2014. This stock was gradually depleted as a result of the ordinary absorption process provided for by the specific tax provisions that originated it and any transformations into tax credits.</p>
<p>Obligation to recalculation of IRES advances and IRAP</p>	<p>Provision is made for the restatement of advance payments for the tax periods in progress as of Dec. 31, 2025 and the following four years (these are the years from 2025 to 2029, for “solar” subjects), in order to take into account the above-mentioned changes in the deduction</p> <ul style="list-style-type: none"> Of the portions of the write-downs and loan losses of banks and insurance companies; of the amortization portions relating to the value of goodwill and other intangible assets that gave rise to the recognition of deferred tax assets (DTAs); of the income components arising exclusively from the adoption of the model for the recognition of the provision for expected credit losses provided for by IFRS 9; of business losses and ACE surpluses.

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Topic	Description
	<p>Prohibition on the use of higher advance payments 2025 and 2026 in compensation</p> <p>On the amount corresponding to the part of the higher tax advances due as a result of the effect of the recalculation obligations under consideration, for the tax periods in progress as of 12/31/2025 and 12/31/2026 (2025 and 2026, for “solar” subjects), it is not possible to apply, when paying:</p> <ul style="list-style-type: none"> • neither “horizontal” offsetting in the F24 form (pursuant to Article 17 of Legislative Decree No. 241/97); • nor the “vertical” or “internal” one, i.e., intervening within the same tax (e.g., credit IRES balance offset with debit IRES advance payment relating to the following tax period).
<p>Obligation of Traceability of travel expenses for enterprises</p>	<p>It has been provided that if the relevant payments are made by traceable methods, reimbursement of expenses for travel or missions under Article 51 co. 5 of the TUIR for</p> <ul style="list-style-type: none"> • food; • lodging; • travel and transportation made by cab or rental with driver. <p>Methods of payment</p> <p>The traceable means by which to make payment are as follows:</p> <ul style="list-style-type: none"> • bank or postal deposit; • other payment systems provided for in Article 23 of DLgs. 9.7.97 no. 241 (such as debit, credit and prepaid cards, bank and bank drafts). <p>Deductibility of the expense in the hands of the enterprise</p> <p>A similar obligation to pay by traceable means is also provided for the purposes of deductibility from business income and from the IRAP taxable base of board and lodging expenses, as well as analytical reimbursements of travel and transportation expenses, made by cab or rental with driver, incurred for employee travel or paid to self-employed workers.</p> <p>Effective</p> <p>The new provisions apply from the tax period following the one in progress on Dec. 31, 2024 (2025 for “solar” subjects).</p>
<p>Obligation of tracking of expenses for travel expenses for professionals</p>	<p>Also for those engaged in the arts and professions, it is stipulated that expenses related to hotel and food and beverage services, as well as those for travel and transportation, carried out by cab or rental with driver, charged analytically to the client, as well as analytical reimbursements related to the same expenses incurred for employee travel or paid to self-employed workers, are deductible from business income and from the IRAP taxable base under the conditions and within the limits currently provided for if they are carried out through the aforementioned traceable instruments (e.g. debit, credit and prepaid cards, etc</p> <p>Effective</p> <p>Again, the provision applies from the tax period following the one in progress as of Dec. 31, 2024 (this is 2025, for individuals with fiscal year coinciding with the calendar year).</p>
<p>Traceability requirement for entertainment and gift expenses for businesses</p>	<p>Entertainment and gift expenses become deductible (for business income and IRAP tax base purposes) only if incurred by bank or postal deposit or by debit, credit and prepaid cards, bank and bank drafts.</p> <p>Therefore, all expenses that qualify as such under Ministerial Decree 19.11.2008 will be deductible:</p> <ul style="list-style-type: none"> • On the one hand, if payment will be made by the above instruments;

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Topic	Description
	<ul style="list-style-type: none"> on the other hand, whether they fall within the already currently set quantitative limits. <p>Advertising and sponsorship expenses</p> <p>Given that Budget Law 2025 only refers to Art. 108 co. 2 of the TUIR, the amendment should not affect, given their different nature, either advertising or sponsorship expenses, which should therefore continue to be deductible even if paid in cash.</p> <p>Effective</p> <p>The provision applies from the tax period following the one in progress on Dec. 31, 2024 (this is 2025, for entities with a fiscal year coinciding with the calendar year).</p>
<p>Credit tax credit for 4.0 investments</p>	<p>A number of changes are made to the rules governing the tax credit for investments in capital goods 4.0 referred to in Art. 1 co. 1051 - 1063 of Law 178/2020.</p> <p>In particular:</p> <ul style="list-style-type: none"> the benefit for intangible assets 4.0 is repealed for 2025; an expenditure ceiling is introduced for the tax credit related to investments in tangible assets 4.0 made in 2025, with the need to submit special communications. For the purposes of using the facility, the chronological order in which applications are submitted therefore becomes relevant.
<p>Credit tax credit transition 5.0</p>	<p>A number of changes are envisaged to the rules governing the tax credit for transition 5.0 investments in Article 38 of Decree Law 19/2024, including:</p> <ul style="list-style-type: none"> an increase in the size of the benefit, extending up to 10 million euros the 35 percent rate provided for the first bracket of investments (in place of the previous 15 percent rate recognized for the portion of investments from 2.5 to 10 million euros); a further increase in the calculation base for photovoltaic systems; the possibility of cumulation with the Single ZES Mezzogiorno tax credit and other facilities financed with resources from European sources. <p>The changes apply retroactively to investments made from 1.1.2024.</p>
<p>Credit tax credit for the listing of SMEs</p>	<p>The tax credit for consulting expenses related to SME listing is recognized until 2027.</p>
<p>Credit tax credit for the ZES Unique South of Italy</p>	<p>The tax credit for investments in the Single SEZ Mezzogiorno, provided in Article 16 of DL 124/2023, is also recognized for 2025.</p> <p>The relief in Article 16-bis of DL 124/2023 for the agricultural sector is also recognized for 2025.</p>
<p>Reversal of the credit tax credit for research and development - Recognition of a capital grant</p>	<p>By Oct. 31, 2024, it was possible, under certain conditions, to apply for the repayment of research and development tax credit unduly used in compensation.</p> <p>For those who opted for repayment, a capital contribution will be recognized parameterized to the amount paid out.</p> <p>A subsequent ministerial decree will regulate the size of the contribution, its installment and disbursement methods.</p> <p>Disbursement, however, will take place within the following spending limits: 60 million euros for the year 2025, 50 million euros for the year 2026, 80 million euros for the year 2027, and 60 million euros for the year 2028.</p>
<p>Credit tax credit for</p>	<p>The tax credit for the maintenance, protection or restoration of properties of historical and artistic interest is extended for 2025, 2026 and 2027 as well.</p>

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Topic	Description
the restoration of properties of historical interest	
Film tax credits	A number of changes are made to the rules governing film tax credits under L. 220/2016, with particular reference to the one intended for film and audiovisual production companies.
Sport bonus	Provision is made to extend for 2025, for business income holders only, the tax credit for liberal donations for maintenance and renovation of public sports facilities and for the construction of new public sports facilities.
VAT on training services rendered to agencies for employment	<p>It is established that training services rendered:</p> <ul style="list-style-type: none"> in favor of parties authorized to administer labor pursuant to Art. 4 of Legislative Decree 276/2003 (employment agencies); by training institutions and companies financed through the bilateral fund established under Article 12 co. 4 of the same Legislative Decree 276/2003. <p>Prior conduct</p> <p>The conducts adopted by taxpayers in relation to the aforementioned services, where carried out before 1.1.2025, shall be unaffected, provided that no final acts have been issued for the same.</p> <p>In any case, it is stipulated that no refund of tax shall be made.</p> <p>Pending disputes</p> <p>Facilitated settlement of pending litigation as of 1.1.2025 concerning the VAT treatment of the above-mentioned services is permitted. The definition is allowed upon request of a party:</p> <ul style="list-style-type: none"> by payment of the higher VAT assessed, without the application of penalties and interest; or by presentation of proof that the supplier has paid the tax. <p>From the amounts due are deducted those already paid while the case is pending.</p> <p>Following the filing of the petition, the court suspends the judgment for 90 days, a period within which the taxpayer, for the purpose of extinguishing the judgment, has the burden of filing proof of the payment made or of the actual discharge of the tax by the provider.</p>

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Topic	Description
VAT rate management of waste	<p>In order to achieve the goals of ecological and energy transition, mitigation and adaptation to climate change, the 10% VAT rate, provided for waste management and storage, is excluded for landfilling of waste as well as incineration without efficient energy recovery.</p> <p>For services related to landfilling and incineration of waste without efficient energy recovery, therefore, the ordinary VAT rate (equal to 22 percent) returns.</p>
Rate VAT activity mountaineering	<p>A 5 percent VAT rate is introduced for the provision of mountaineering sports activity courses:</p> <ul style="list-style-type: none"> imparted, including in an organized form; where such courses are not exempt from VAT. <p>The measure complements the existing 5 percent VAT rate for the provision of courses related to winter sports activity.</p> <p>Until the effective date of the reform of the VAT regime for associations (currently scheduled to take effect as of Jan. 1, 2026), the 5 percent rate applies only for services</p>



Topic	Description
<p>Reverse charge for procurement in the logistics sector</p>	<p>that are not exempt from VAT as they are rendered by sports associations and other entities referred to in Art. 4 co. 4 of Presidential Decree 633/72.</p> <p>For the provision of services, carried out under contracts and subcontracts, characterized by the prevalent use of labor at the principal's premises, rendered to companies engaged in the transportation and handling of goods, there is provision for:</p> <ul style="list-style-type: none"> the application of the reverse charge mechanism, following the issuance of an appropriate measure of derogation from the VAT Directive by the Council of the European Union; on a transitional basis, pending the issuance of such derogating measure, an optional scheme as a result of which the payment of VAT is the responsibility of the principal. <p>Payment of VAT by the principal</p> <p>For the aforementioned services, pending the issuance of the derogation measure authorizing the application of the reverse charge mechanism, a transitional regime is introduced such that:</p> <ul style="list-style-type: none"> the supplier and the principal of the service may opt for the payment of VAT by the principal, as an exception to the ordinary rules for the payment of tax; the principal communicates the exercise of the aforementioned option, which is valid for three years, to the Internal Revenue Service by means of a special form (which will be approved by a measure to be issued soon); the payment of VAT, by the principal, is made by means of the F24 form and without the possibility of "horizontal" offsetting pursuant to Art. 17 of Legislative Decree 241/97, by the 16th day of the month following the date of issue of the invoice by the supplier. The scheme is excluded for supplies of services: <ul style="list-style-type: none"> already subject to VAT under the reverse charge mechanism as per Art. 17 co. 6 letters a) to a-quater) of Presidential Decree 633/72; rendered to public administrations and other entities and companies required to pay the tax under the split payment mechanism; made by employment agencies referred to in Article 4 of Legislative Decree 276/2003. <p>The effectiveness of the scheme is subject to the issuance of an implementing measure by the Internal Revenue Service.</p> <p>In the event that the VAT is found to be not due, the principal is entitled to a refund of the tax, provided that he proves that the tax has actually been paid.</p> <p>The principal is subject to the penalty regime provided for errors in the application of the reverse charge under Article 6 co. 9-bis.1, first sentence, of Legislative Decree 471/97 (i.e., an administrative penalty of between 250 and 10,000 euros). The supplier remains jointly and severally liable to pay the penalty.</p> <p>Reverse charge mechanism</p> <p>Subject to the issuance of a derogation measure by the Council of the European Union, the extension of the reverse charge mechanism is envisaged for the provision of services</p> <ul style="list-style-type: none"> carried out through contracts, subcontracts, entrusting to consortium entities or negotiated relationships however denominated characterized by the prevalent use of labor at the principal's places of business with the use of instrumental goods owned by the latter or traceable to it in any form;

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Topic	Description
<p>Link between tools for sending fees and instruments of payment electronic</p>	<ul style="list-style-type: none"> rendered to enterprises engaged in the business of transport and handling of goods and provision of logistics services. <p>With effect from 1.1.2026, Art. 2 co. 3 of Legislative Decree 127/2015 is amended by providing that the instruments that enable the telematic storage and transmission of fees pursuant to Art. 2 co. 1 of the same Legislative Decree 127/2015 (e.g., telematic recorders) must also ensure the full integration of the process of recording fees with the electronic payment process.</p> <p>To this end, provision is made, on the one hand, for daily electronic payment data to be recorded and transmitted together with the fee data; on the other hand, a technical connection constraint is introduced between the tools related to the sending of fees and those (hardware or software) that enable the acceptance of electronic payments.</p> <p>The measure is aimed at combating tax evasion, as it aims to facilitate controls by enabling the detection of any inconsistencies between “electronic receipts” issued and receipts collected.</p> <p>Penalty provisions</p> <p>As a result, the penalty provisions relating to the violation of the obligations regarding the storage and transmission of fees are adjusted, establishing that:</p> <ul style="list-style-type: none"> the penalty amounting to 100 euros, provided for in Art. 11 co. 2-quinquies of Legislative Decree 471/97 for omitted or erroneous transmission of considerations that does not affect the liquidations, also applies in the hypothesis of violation of the obligations of storage and transmission of electronic payments referred to in Art. 2 co. 3 of Legislative Decree 127/2015; the penalty from €1,000 to €4,000, provided for in Art. 11 co. 5 of Legislative Decree 471/97, also applies in cases of failure to connect the instrument for accepting electronic payments and the instrument for sending the fees. <p>With regard to ancillary penalties, it is established that:</p> <ul style="list-style-type: none"> the penalties provided for in Art. 12 co. 2 of Legislative Decree 471/97, in the case of repeated violations of the obligations to certify the fees, also apply in cases of omitted, late or incomplete transmission of daily electronic payment data; the penalties provided for in the following co. 3 of the aforementioned art. 12, for failure to install the fiscal measuring devices, are also applied in cases of failure to connect the instrument for accepting electronic payments with the instruments for storing and transmitting the fees. <p>Effective date</p> <p>The new obligations and related penalty provisions apply from 1.1.2026.</p>
<p>Access to electronic billing data</p>	<p>Access by the Customs and Monopolies Agency</p> <p>The authority to access electronic invoice data, already granted to the Guardia di Finanza and the Revenue Agency, is also granted to the Customs and Monopolies Agency.</p>
	<p>The data contained in the XML files, stored until December 31 of the eighth year following the year in which the reference declaration was submitted or until the settlement of any judgments, can also be used by the Customs and Monopolies Agency, limited to the sale of products subject to excise duty or other indirect taxes referred to in the Consolidated Law on Excise Duties (products subject to the supervision and control referred to in Article 18 of Legislative Decree 504/95).</p>

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Topic	Description
	<p>Acquisition and verification of data by INPS</p> <p>A measure is introduced aimed at simplifying and streamlining the process of recognition and disbursement of economic benefits by INPS.</p> <p>In the event that the outcome of the disbursement is made to depend on the applicant's presentation of an invoice, the Institute may, as of 1.1.2025, acquire and verify "in interoperability" the information available in the Internal Revenue Service's database concerning electronic invoicing, regardless of the issuing party.</p>
<p>Extensions of the 2016 and 2017 central Italian earthquake exemptions</p>	<p>Certain facilities referring to the earthquake events of 2016 and 2017 that affected the municipalities in the regions of Abruzzo, Lazio, Marche and Umbria listed in Annexes 1, 2 and 2-bis of DL 189/2016 are extended.</p> <p>Extension of exemption for income from buildings and from IMU</p> <p>Exemptions from IRPEF and IRES, as well as from IMU, are extended for buildings that at the same time are:</p> <ul style="list-style-type: none"> • Located in the municipalities affected by the aforementioned seismic events; • destroyed or subject to union eviction orders, however adopted by 31.12.2018, as totally or partially uninhabitable. <p>In the presence of these requirements:</p> <ul style="list-style-type: none"> • the income from the buildings does not contribute to the formation of the taxable base for the purposes of IRPEF and IRES, until the final reconstruction and agibility of the buildings themselves, and in any case until the tax year 2024; • buildings are exempt from IMU until their final reconstruction or agibility, and in any case no later than 31.12.2025. <p>Extension of stamp and registration tax exemption</p> <p>The exemption from stamp and registration tax for applications, contracts and documents submitted to the Public Administration in execution of the provisions of the commissioner's orders is extended to Dec. 31, 2025.</p> <p>The exemption shall apply:</p> <ul style="list-style-type: none"> • to individuals residing or domiciled in the municipalities affected by the earthquake events of 2016 and 2017; • to legal entities with registered or operational headquarters in the same municipalities <p>Extension of exemption from the single fee</p> <p>The exemption from the one-time fee, for the occupation of public spaces and areas and for the display of advertising media, is extended until 2025 for the benefit of businesses with registered offices or operations in the municipalities affected by the aforementioned earthquakes.</p>
<p>IMU - Exemption for the earthquake of Marche and Umbria in 2022 and 2023</p>	<p>An exemption from IMU is provided for buildings for residential use at the same time:</p> <ul style="list-style-type: none"> • located in the territories of the Marche and Umbria Regions affected by the seismic events that occurred on 9.11.2022 and 9.3.2023, respectively, for which a state of emergency of national importance was declared; • destroyed or subject to union evacuation orders, as totally or partially uninhabitable. <p>If the above requirements are met, buildings for residential use are entitled to exemption from IMU:</p> <ul style="list-style-type: none"> • for the year 2025; or until the final reconstruction or habitability of the buildings, if these occur before 31.12.2025.

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Topic	Description
<p align="center">First home relief</p> <p align="center">-</p> <p align="center">Changes</p>	<p>The time limit within which it is possible to dispose of the “former” first home, without losing the relief applied when purchasing real estate under Note II-bis to Article 1 of the Tarifa, Part I, annexed to Presidential Decree 131/89, is raised to 2 years.</p> <p>First home relief</p> <p>First home relief allows the following favorable treatment (depending on whether or not the deed is taxable for VAT) to be taken advantage of when purchasing the home (as long as it is classified in cadastral categories other than A/1, A/8 or A/9):</p> <ul style="list-style-type: none"> • registration tax of 2% (with a minimum of 1,000 euros) and mortgage and cadastral taxes in the fixed amount of 50 euros each (pursuant to Art. 10 co. 3 of Legislative Decree 23/2011); • 4% VAT (pursuant to No. 21 of Table A, Part II, annexed to Presidential Decree 633/72) and mortgage and cadastral taxes in the fixed amount of 200 euros each. <p>Conditions for first home relief</p> <p>Among the conditions necessary to apply this favorable regime, identified by Note II-bis to Article 1 of the Tariff, Part I, annexed to Presidential Decree 131/86, one requires that the purchasing taxpayer in the deed of purchase “declare that he/she is not the holder, not even by shares, including in legal community throughout the national territory of the rights of ownership, usufruct, use, habitation and nude ownership on another home purchased by the same person or spouse” with the first home benefits. However, as of 1.1.2016, a moratorium was introduced for the fulfillment of this condition, according to which the benefit may also apply to the taxpayer who at the time of the deed is still the owner of the home already purchased with the benefit, provided that he/she alienates it within one year from the date of the deed (co. 4-bis of Note II-bis).</p> <p>Term extended to 2 years</p> <p>Budget Law 2025 doubled the resale deadline (which was 1 year) to 2 years. Therefore, as of 1.1.2025, those who buy their first home while still owning, at the time of the deed, a property (wherever located in the country) already purchased with the benefit, will have 2 years to dispose of it (and no longer just one year), without losing the benefit on the new purchase.</p> <p>Expiration</p> <p>Failure to dispose of the property within the two-year period will result in forfeiture of the benefit, with the consequent application of the full tax and penalties.</p>
<p align="center">Indication of the CIN in the declarations tax returns and in the Certificazione Unica</p>	<p>It is stipulated that the tax form approval measures adopted by the Internal Revenue Service will have to define how the CIN is to be indicated in tax returns and the Certificazione Unica.</p> <p>National Identification Code (NIC)</p> <p>The CIN is the code with which, pursuant to Article 13-ter of DL 145/2023, must equip:</p> <ul style="list-style-type: none"> • real estate units for residential use intended for leases for tourist purposes; • real estate units for residential use intended for short-term leases under Art. 4 of DL 50/2017; • hotel and non-hotel tourist accommodation facilities. <p>Indication of the CIN in returns and the Single Certification</p> <p>Revenue Agency orders approving tax forms will have to define how to indicate the CIN:</p>

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Topic	Description
	<ul style="list-style-type: none"> In the tax returns; in the Single Certification. <p>In addition, it is clarified that the CIN will have to be indicated in the communications of intermediaries under Art. 4 co. 4 of DL 50/2017, on the subject of short leases.</p>
<p>Stamp duty on life insurance policies</p>	<p>Regarding the stamp tax on communications related to insurance contracts, referred to in Art. 13 co. 2-ter of the Tariff annexed to Presidential Decree 642/72, Budget Law 2025 modifies the tax payment methods with reference to communications related to life insurance contracts, so as to align them with the ordinary payment methods applied to other sectors.</p> <p>Payment at redemption</p> <p>The Ministerial Decree of May 24, 2012 (which had dictated the implementing provisions for the stamp tax on financial products) specified that, for communications related to insurance policies and operations under life insurance classes III and V, the stamp tax for each year was charged when the policy was redeemed or redeemed.</p> <p>Annual payment</p> <p>Budget Law 2025 stipulates that, for communications relating to life insurance contracts, the stamp duty (of 2 per thousand) referred to in Art. 13 co. 2-ter of the Tariff annexed to Presidential Decree 642/72, "is due annually and the corresponding amount is paid each year, starting from 2025, by insurance companies in the ordinary manner provided for" by Art. 4 of Ministerial Decree 24.5.2012.</p> <p>In practice, the new rule prescribes that the payment of stamp duty on customer communications related to life insurance contracts must also be made annually, in the ordinary manner and not at the time of policy redemption or redemption.</p> <p>Transitional regulation</p> <p>It is, therefore, provided that for life insurance contracts in force as of 1.1.2025, the amount corresponding to the total amount of the stamp duty referred to in Art. 13 para. 2-ter, calculated for each year until 2024, shall be paid in an amount equal to:</p> <ul style="list-style-type: none"> 50% by 30.6.2025; to 20% by 30.6.2026; to 20% by 30.6.2027; for the remaining 10% share by 30.6.2028.
<p>Exemption tax mortgage tavolar system</p>	<p>Budget Law 2025 introduces exemptions from the mortgage tax related to specific situations concerning areas where the tavolare system of real estate publicity in RD 28.3.29 No. 499 operates, a system that, instead of transcription, provides for the notation in the land book (which has constitutive effect, unlike the publicity effect of transcription in the ordinary system).</p> <p>Cancellation of usufruct, use and dwelling rights</p> <p>Consistent with the provisions of Article 8 of Legislative Decree 139/2024, exemption from the mortgage tax is provided, in territories subject to the tavolar publicity system, for deeds preordained to the cancellation of rights of usufruct, use or dwelling already registered in favor of persons deceased on or after 1.1.2025 and with respect to applications for cancellation for cause of death received after 1.1.2025.</p> <p>Special constraints for the Autonomous Province of Bolzano</p> <p>By inserting new co. 3 in Art. 32 of Presidential Decree 601/73, it is provided that exemption from mortgage taxes applies to acts of annotation and cancellation in the land register of liens:</p>

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Topic	Description
	<ul style="list-style-type: none"> provided for in the subsidized housing regulations of the Autonomous Province of Bolzano; for real estate that has been agreed or reserved for residents in accordance with the provincial law on town planning.
<p>Single fee - Changes in discipline</p>	<p>A number of changes are made to the regulation of the property fee for advertising concession, authorization or display (so-called “single fee”) in Art. 1 co. 816 ff. of Law 160/2019.</p> <p>Modification of fees</p> <p>It is clarified that the local authority's power to modify the tariffs related to the single fee is to be implemented according to criteria of reasonableness and gradualness, on account of:</p> <ul style="list-style-type: none"> of the environmental and urban impact of the occupations and advertising displays covered by the fee; of the impact of the aforementioned occupations and advertising displays on elements of street furniture or on the means of local public transport services or sustainable mobility services. <p>Content of the regulation</p> <p>In relation to the content of the regulation governing the one-time fee, it is clarified that:</p> <ul style="list-style-type: none"> the obligation to indicate the area of the installations allocated by the municipality for the service of public postings exists only if said service continues to be carried out by the municipality; a reduction of up to half of the single fee may be arranged for installations located on private land or otherwise in private areas. <p>Determination of the fee for advertising messages</p> <p>Acknowledging some indications of practice, the discipline of determining the single fee due for the broadcasting of advertising messages is supplemented in order to specify that:</p> <ul style="list-style-type: none"> in order to identify the area of the advertising medium on the basis of which the single fee due is to be calculated, the area relating to elements without an advertising character is not to be counted; when a plurality of tourist or territorial signs or directional arrows are installed on a single advertising installation, including those referring to different subjects and companies, the area subject to the single fee is that of the entire installation covered by the concession or authorization (if the holders of the concession or authorization measure for the installation of the installation are different, the fee is to be settled separately, in proportion to the area of the sign or sign group placed in the availability of each of them).
<p>Blocking of payments of public Government - Amounts due as wages and salary</p>	<p>Public administrations, before making payments in excess of 5,000 euros, must check whether there are any outstanding role loads by making a report to the Agenzia delle Entrate-Riscossione.</p> <p>If the verification is positive, the payment is suspended and the amount that should have been paid is directly attached.</p> <p>With respect to amounts due as wages, salary or other compensation inherent in the employment relationship including those due by way of severance, verification with the Internal Revenue Service operates for payments exceeding 2,500 euros and not 5,000 euros.</p> <p>However, it remains the case that garnishment can only be ordered if the dues are at</p>

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Topic	Description
	<p>least 5,000 euros in amount.</p> <p>The limits on wage and salary garnishment under the Code of Civil Procedure remain in place.</p> <p>Effective</p> <p>The changes operate for payments of wages, salaries and other benefits to be made on or after Jan. 1, 2026.</p>

Topic	Description
<p>Exclusion from withholding for winnings at the Winter Olympic Games</p>	<p>Awards given to athletes by the Italian National Olympic Committee (CONI) and the Italian Paralympic Committee (CIP) for medals obtained in competitions held in connection with the Milan-Cortina 2026 Olympic and Paralympic Winter Games are not subject to withholding tax under Article 30 of Presidential Decree 600/73 and are excluded from taxation for IRPEF purposes.</p>
<p>Bodies of control and contributions public significant</p>	<p>In carrying out their duties and in accordance with the responsibilities assigned to them by the regulations in force, the supervisory bodies, including monocratic ones, of companies, entities, bodies and foundations that receive, even indirectly and in any form, a significant contribution from the State are required to</p> <ul style="list-style-type: none"> • carry out special verification activities aimed at ascertaining that the use of the aforementioned contributions has taken place in compliance with the purposes for which they were granted; • send annually to the Ministry of Economy and Finance (MEF) a report containing the findings of the verifications carried out. <p>Significant size of government contribution</p> <p>The significant size of the government contribution will be determined by a DPCM, prepared on the proposal of the Minister of Economy and Finance, to be adopted by the end of March 2025.</p> <p>Required presence of the controlling body</p> <p>The provision under consideration introduces a circumstance (the receipt of significant public contributions) that makes the presence of the control body mandatory.</p> <p>In fact, the aforementioned obligations of the control body - to carry out special verification activities aimed at ascertaining the proper use of contributions and to report annually to the MEF regarding the findings of these verifications - are imposed not only on control bodies “already established,” but also on those “to be established for the purpose of compliance with the purposes set forth in this paragraph.”</p> <p>This is relevant, in the first place, in LLCs that - at present - are not required to appoint a control body, that is, pursuant to Article 2477, para. 2, Civil Code, which:</p> <ul style="list-style-type: none"> • do not have to prepare consolidated financial statements; • do not control a company required to have a statutory audit; • have not exceeded for two consecutive fiscal years at least one of the following limits: 4 million euros in total assets in the balance sheet, 4 million euros in revenues from sales and services or 20 employees employed on average during the fiscal year. <p>These LLCs, in fact, will have to proceed with the appointment of the control body (including a monocratic one) should they be among the companies that receive a significant amount of contribution.</p> <p>Moreover, the provision, by requiring the presence of the control body (including a monocratic one), seems to impose its appointment even in the event that the srl -</p>

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Topic	Description
	<p>already obliged to appoint a control body “or” a statutory auditor - has opted for the latter (a solution that appears to be the one most widely adopted).</p> <p>Effective date of the new provision</p> <p>As for the first operation of the rule, the reference to entities that “receive” (and not “have received”) significant public contributions suggests its application only with regard to contributions that will be received from 1.1.2025.</p> <p>It is not clear, however, within what timeframe, starting from the receipt of significant public contributions, the appointment of the control body must be made.</p> <p>Expenditure cap</p> <p>As of Jan. 1, 2025, the prohibition on making expenditures for the purchase of goods and services in an amount exceeding the average value incurred for the same purposes in fiscal years 2021, 2022 and 2023, as reflected in the relevant budgets, also applies to companies that have received significant contributions. This is a provision that raises obvious doubts of constitutional legitimacy (for violation of Articles 3 and 41 of the Constitution), being unreasonably restrictive of the freedom of private economic initiative.</p>
<p>Sabatini Law - Refinancing</p>	<p>An increase in the appropriation of:</p> <ul style="list-style-type: none"> • 400 million euros for the year 2025; • 100 million euros for the year 2026; • 400 million euros for each of the years 2027 to 2029.
<p>First home warranty fund</p>	<p>Some measures related to the First Home Guarantee Fund have been extended and its operation has been changed.</p> <p>Reduction in the number of beneficiaries of the Fund's “ordinary” guarantee</p> <p>It is stipulated that the Guarantee Fund, in its ordinary operation at 50 percent of the capital, shall operate exclusively in favor of:</p> <ul style="list-style-type: none"> • young couples; • single-parent families with minor children; • tenants of housing owned by the Autonomous Institutes for Public Housing; • young people under 36. <p>These categories of individuals, prior to the amendment, were identified as priority beneficiaries of the measure.</p> <p>Extension of the “special” discipline of access to the Fund</p> <p>Extended to Dec. 31, 2027 is the “special” regime of operation of the Fund referred to in Art. 64 co. 3 of DL 73/2021, which allows access to the guarantee of up to 80% (instead of 50%) to young couples, single-parent families with minor children, tenants of housing owned by the Autonomous Institutes for Public Housing however denominated and young people under 36.</p> <p>Access to the 80% Fund is subject to the twofold condition that:</p> <ul style="list-style-type: none"> • each of the applicants has an ISEE not exceeding 40,000 euros annually; • the application concerns financing with a financeability limit of more than 80 %. <p>Extension of extensions for large families</p> <p>Extensions provided by Law 213/2023 for large families are extended to Dec. 31, 2027. Among others, it should be noted that until 12/31/2027:</p> <ul style="list-style-type: none"> • households with three children under 21 years of age with ISEE not exceeding 40,000 euros per year, those with four children under 21 years of age with ISEE not exceeding 45,000 euros per year, and those with five or more children

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Topic	Description
	<p>under 21 years of age with ISEE not exceeding 50,000 euros per year continue to be included among the recipients of the Fund;</p> <ul style="list-style-type: none"> for these categories, when they submit requests for mortgages worth more than 80% of the purchase price of the property, including ancillary charges, the guarantee is issued to the extent of 80%, 85% and 90%, respectively, of the principal amount, time to time outstanding on the loans granted.
<p>Dote Fund for the family for sports activities and recreation</p>	<p>In order to support parenting and sports and recreational activities carried out during out-of-school periods, a grant is established for entities that provide sports and recreational services for minors meeting certain requirements.</p> <p>Entities benefiting from the contribution</p> <p>Beneficiaries of the contribution are:</p> <ul style="list-style-type: none"> amateur sports associations and clubs registered with the National Register of Amateur Sports Activities (RASD); Third sector entities registered with the National Single Third Sector Register (RUNTS). <p>Benefit recipient requirements</p> <p>The grant is payable as reimbursement for sports and recreational services provided:</p> <ul style="list-style-type: none"> for each dependent child between the ages of 6 and 14; provided that the child is part of households with an income of 15,000 euros or less, certified with a valid ISEE.. <p>Implementation provisions</p> <p>The measure and terms of the grant will be defined by a forthcoming DPCM or a decree of the Delegated Policy Authority on Sports.</p>

3 MAIN NEW FEATURES ON LABOR AND WELFARE

The following is a summary of the main labor and welfare news contained in Budget Law 2025.

Topic	Description
<p>Reduction Contribution for new members of the INPS artisans' and traders' divisions</p>	<p>Workers who enroll for the first time during 2025 in INPS's artisans' and traders' divisions may benefit from a 50 percent contribution reduction, subject to notification to INPS.</p> <p>The measure is an alternative to other existing benefits that provide rate reductions..</p> <p>Subjective scope</p> <p>The relief is available to the following individuals:</p> <ul style="list-style-type: none"> sole proprietors or partners of companies; family collaborators of the subjects mentioned above. <p>Individuals under the flat-rate scheme are also eligible for the relief.</p> <p>Objective scope</p> <p>The contribution reduction should operate on both minimum and percentage contributions calculated on the basis of total declared business income.</p> <p>Term</p> <p>The relief is available for 36 months, continuously, from the date of business start-up or first entry into the company in 2025.</p> <p>Contribution credit</p> <p>For the crediting of the contribution, the provisions dictated with reference to the INPS</p>

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Topic	Description
	<p>Separate Management Scheme apply; therefore, the payment of a total amount equal to the contribution calculated (with the rates provided for the Artisans' and Dealers' Management Schemes) on the minimum income, gives the right to the crediting of all the monthly contributions relating to each calendar year to which the payment refers. If, on the other hand, a lower amount is paid, the months credited are proportionally reduced.</p>
<p>Decontribution South</p>	<p>It is provided for:</p> <ul style="list-style-type: none"> the early end of the South decontribution referred to in Art. 1 co. 161 ff. of the L. 30.12.2020 no. 178, which can be applied until 31.12.2024 with reference to subordinate employment contracts stipulated by 30.6.2024; the introduction of a new contribution relief for companies that employ workers in the South of Italy. <p>New contribution relief for companies that employ workers in the South</p> <p>A new contribution relief is introduced for private employers who employ permanent workers in the regions of Abruzzo, Molise, Campania, Basilicata, Sicily, Apulia, Calabria and Sardinia.</p> <p>Employers in the agricultural sector, as well as domestic and apprenticeship contracts are excluded (specific entities, such as economic public entities, are also excluded).</p> <p>In addition, the regulations distinguish between:</p> <ul style="list-style-type: none"> micro, small and medium-sized enterprises, i.e., private employers who have no more than 250 employees on their payroll; private employers that do not fall under the notion of microenterprises or small and medium-sized enterprises. <p>Set-up and measure</p> <p>The facility consists of a partial exemption from the payment of employer social security contributions (excluding INAIL premiums) in the amount of:</p> <ul style="list-style-type: none"> 25% (maximum 145 euros on a monthly basis for twelve months) for the year 2025, in relation to each worker hired on a permanent basis as of 12/31/2024; 20% (maximum €125 on a monthly basis for twelve monthly payments) for the year 2026, in relation to each worker hired on a permanent basis as of 12/31/2025; 20% (maximum €125 on a monthly basis for twelve monthly payments) for the year 2027, in relation to each worker hired on a permanent basis as of 12/31/2026; 20% (maximum €100 on a monthly basis for twelve monthly payments) for the year 2028, in relation to each worker hired on a permanent basis as of 12/31/2027; 15% (maximum €75 on a monthly basis for twelve monthly payments) for the year 2029, in relation to each worker hired on a permanent basis as of 12/31/2028. <p>Conditions</p> <p>Without prejudice to the general principles for the use of incentives under Art. 31 of Legislative Decree No. 150 of 14.9.2015, the contribution exemption is entitled:</p> <ul style="list-style-type: none"> if the conditions set out in Art. 1 co. 1175 of L. 27.12.2006 no. 296 are met (e.g., regularity of contributions); if the employer is in compliance with the hiring obligations set forth in Art. 3 of L. 12.3.99 no. 68 (i.e., mandatory hiring of disabled).

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Topic	Description
	<p>In addition, for micro, small and medium-sized enterprises, the exemption is granted within the limits of EU Commission Regulation No. 2831 dated Dec. 13, 2023, on the application of Articles 107 and 108 of the Treaty on the Functioning of the European Union to de minimis aid. In contrast, for private employers that do not fall under the notion of microenterprise or small and medium enterprise:</p> <ul style="list-style-type: none"> the recognition of the exemption is subject to the condition that the employer demonstrates, as of December 31 of each year, an increase in employment, compared to the previous year, of permanent labor relations; the effectiveness of the exemption is subject, pursuant to Article 108(3) of the Treaty on the Functioning of the European Union, to the authorization of the European Commission and is suspended until the date of adoption of the decision. <p>Cumulability</p> <p>The contribution exemption cannot be combined with the following facilities:</p> <ul style="list-style-type: none"> incentive for the hiring of young people under 35 in strategic sectors for the development of new technologies and the digital and ecological transition, referred to in Art. 21 of DL 60/2024; youth bonus referred to in Art. 22 of DL 60/2024; women bonus referred to in Art. 23 of DL 60/2024; bonus Special Economic Zone for the South of Italy - Single Economic Zone pursuant to Art. 24 of DL 60/2024.
<p>Decontribution of female workers with children</p>	<p>As of the year 2025, a partial contribution exemption is introduced on the portion of social security contributions for disability, old age and survivors (IVS) to be borne by the employed and/or self-employed woman, to be implemented by decree of the Minister of Labor and Social Policy (the decree will also define the extent of the exemption).</p>

Topic	Description
	<p>Subjective scope</p> <p>The partial contribution exemption covers female workers:</p> <ul style="list-style-type: none"> employees (excluding domestic work relationships); self-employed who receive at least one of self-employment income, business income in ordinary accounting, business income in simplified accounting, or participation income and who have not opted for the flat-rate scheme. <p>Conditions</p> <p>Female workers must be mothers of two or more children, with the contribution exemption accruing until the month of the youngest child's 10th birthday. As of 2027, for female workers who are mothers of three or more children, the contribution exemption is due until the month of the youngest child's 18th birthday.</p> <p>For the years 2025 and 2026, the partial decontribution does not accrue to female workers who are beneficiaries of the total decontribution provided for in Art. 1, para. 180 of Law 213/2023, who will instead be able to continue to benefit from the total exemption.</p> <p>Salary and taxable income</p> <p>Contributory exemption is granted provided that the salary or taxable income for social security purposes does not exceed the amount of 40,000 euros on an annual basis.</p> <p>For self-employed female workers enrolled in the General Compulsory Insurance</p>

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Topic	Description
	<p>managed by INPS as well as in the Separate Management under L. 335/95, the partial contribution exemption is parameterized to the value of the minimum income level provided for in Art. 1 co. 3 of L. 233/90.</p>
<p>Parental Leave</p>	<p>It is provided that the 3 months of non-transferable parental leave, referred to in Art. 34 co. 1 first sentence of Legislative Decree No. 151, 26.3.2001, from 1.1.2025 will be raised, alternatively between parents:</p> <ul style="list-style-type: none"> to 80% of pay for 2 months' pay, for workers who finished maternity or paternity leave after Dec. 31, 2023 and by Dec. 31, 2024, to be taken by the sixth year of the child's life; at 80% of pay for 3 months' pay for workers who will end their maternity or paternity leave after 31.12.2024, to be taken by the sixth year of the child's life.
<p>Bonus for new births</p>	<p>A bonus is provided in the amount of 1,000 euros one-time for children born or adopted from 1.1.2025.</p> <p>The bonus is disbursed, upon application, by INPS. Disbursement is expected in the month following the month of birth or adoption.</p> <p>Subjective requirements</p> <p>Applicant parents must be residents of Italy and:</p> <ul style="list-style-type: none"> Italian citizens or citizens of the European Union, or their family members who hold the right of residence or the right of permanent residence, or non-EU citizens holding an EU long-term residence permit or holders of a single work permit authorized to work for a period exceeding 6 months or holders of a residence permit for research purposes authorized to stay in Italy for a period exceeding 6 months. <p>Objective requirements</p> <p>The applicant parent's household must have an ISEE not exceeding 40,000 euros annually.</p> <p>Disbursements under the single and universal allowance introduced by Legislative Decree 230/2021 should not be counted for the purpose of its determination.</p>
<p>Daycare Bonus</p>	<p>There is an intervention on the regulation of the contribution for the payment of fees for the attendance of authorized public and private daycare centers and forms of home care in favor of children under 3 years of age suffering from serious chronic diseases (so-called "daycare bonus").</p> <p>It was, in fact, eliminated the requirement of the presence of at least one child under the age of 10 to take advantage of the increase in the bonus of 2,100 euros provided by Art. 1 co. 177 lett. b) of Law No. 213 of Dec. 30, 2023, for a total of 3,600 euros.</p> <p>From 1.1.2025, therefore, for children born from 1.1.2024 in households with an ISEE up to 40,000 euros, regardless of the presence of another child under the age of 10 in the household, the amount of the "daycare bonus" is increased by 2,100 euros.</p> <p>The amount of the bonus remains firm at 1,500 euros per year for families with ISEE over 40,000 euros.</p> <p>The single and universal allowance referred to in DLgs. 230/2021 is not to be counted in determining the ISEE useful for the purposes of disbursement of the bonus in question.</p>
<p>Treatment supplementary special for the tourism,</p>	<p>A special supplementary treatment equal to 15 percent of the gross wages paid in relation to night work and overtime is granted to workers in food and beverage establishments (referred to in Article 5 of Law 287/91) and workers in the tourism sector (including spas), effettuate nei giorni festivi.</p>

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Topic	Description
accommodation and spa sectors	<p>Mode</p> <p>The treatment is granted:</p> <ul style="list-style-type: none"> to workers in the aforementioned sectors with employment income not exceeding 40,000 euros in the 2024 tax period; by the withholding agent (who will recover the accrued credit by offsetting and indicate the amounts paid in the Single Certification); at the request of the employee (who will have to certify in writing the 2024 employment income). <p>Period</p> <p>The treatment can be recognized for pay periods from 1.1.2025 to 30.9.2025.</p> <p>Tax regime</p> <p>The treatment does not contribute to the formation of income.</p>
Treatment social security of compensation to horse racing employees	<p>As of 1.1.2025, those involved in the control and regulation of horse racing and saddle horse events authorized for the purpose of sports betting will be registered for social security purposes in the INPS Separate Management Fund ex L. 335/95.</p> <p>Taxable contribution base</p> <p>The contribution obligation arises when the amount of 5,000 euros of annual compensation is exceeded. This is an exemption excluded from social security contributions.</p> <p>Reduction of 50 percent of the taxable contribution amount.</p> <p>Until Dec. 31, 2027, the contribution to the INPS Separate Pension Fund is due in the limit of 50 percent of the contribution taxable amount. The pension taxable income is reduced by an equivalent amount.</p> <p>Contribution rate</p> <p>The contribution rate is set at 25%, plus additional rates for financing non-pension benefits.</p> <p>Contribution Payment</p> <p>Social security contributions are paid:</p> <ul style="list-style-type: none"> - 2/3 by the Ministry of Agriculture, Food Sovereignty and Forestry; - 1/3 by the member.
Allowance for inclusion	<p>In relation to the economic condition of the household of the applicant of the Inclusion Allowance referred to in DL 48/2023, it is provided:</p> <ul style="list-style-type: none"> an increase from 9,360 to 10,140 euros in the maximum ISEE value that must
	<ul style="list-style-type: none"> be possessed by the applicant's household in order to qualify for the benefit; an increase from 6,000 to 6,500 euros per year (to be multiplied by the corresponding parameter of the equivalence scale) in the household income threshold of the same household. Where the household is composed exclusively of persons 67 years of age or older and other family members all of whom are severely disabled or non-self-sufficient, the household income threshold is raised from 7,560 to 8,190 euros annually, to be multiplied by the corresponding parameter of the equivalence scale. This amount is further increased to 10,140 euros in cases where the household resides in a rented dwelling. <p>Action is also taken with reference to the measure of the Inclusion Allowance by raising the economic benefit, which consists of two items:</p> <ul style="list-style-type: none"> a family income supplement, which increases from 6,000 to 6,500 euros annually. The same amount is increased from 7,560 to 8,190 euros if the

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Topic	Description
	<p>household is composed of persons all aged 67 years or older, or by them and other family members all of whom are severely disabled or non-self-sufficient;</p> <ul style="list-style-type: none"> an income supplement for households residing in a rented dwelling, which is raised from 3,360 to 3,640 euros annually. This amount is increased from 1,800 to 1,950 euros if the household consists of all persons aged 67 years or older (or these and other family members all of whom are severely disabled or non-self-sufficient).
<p>Support for training and work</p>	<p>The requirements for access to Training and Labor Support, referred to in Article 12 of DL 48/2023, are amended, providing for an increase from 6,000 to 10,140 euros:</p> <ul style="list-style-type: none"> Of the maximum value of the ISEE related to the applicant's household; of the household income threshold of the same household. <p>The amount of the benefit is also increased from 350 to 500 euros per month.</p> <p>Finally, it is provided that the duration of the benefit, corresponding to a maximum of 12 monthly payments, can be extended for a maximum duration of a further 12 months, subject to updating of the Personalized Service Pact, where, at the end of the first 12 months of fruition, it results in the participation of the person concerned in a training course.</p>
<p>New requirement for NASpl eligibility</p>	<p>A new contribution requirement for NASpl entitlement is introduced, with reference to unemployment events occurring from 1.1.2025.</p> <p>For workers who, in the 12 months prior to the unemployment event that confers the right to NASpl entitlement, have voluntarily resigned from a permanent employment relationship, it will in fact be possible to access the benefit only if they have accrued at least 13 weeks of contributions with the new employment.</p> <p>In other words, if a worker resigns from a company or consensually terminates employment and in the following 12 months is hired by another employer and dismissed by that employer, he or she will not accrue the right to NASpl where the new relationship has not lasted at least 13 weeks.</p>
<p>Treatment of unemployment in favor of workers repatriated</p>	<p>With reference to terminations of employment occurring on or after 1.1.2025, Law No. 402 of 25.7.75, concerning unemployment benefits for repatriated and frontier workers, will no longer apply.</p>
<p>Changes to the allowance of discontinuity for workers in the entertainment</p>	<p>Effective 1.1.2025, the following changes are made to the discontinuity allowance for workers in the entertainment sector, as set forth in Legislative Decree No. 175 of Nov. 30, 2023:</p> <ul style="list-style-type: none"> the income limit provided for access to the discontinuity allowance is raised from €25,000 to €30,000; the minimum number of days of credited contributions to the Performing Arts Workers' Pension Fund, from 60 to 51, that the worker must have accrued to access the allowance is changed; the provision that stipulated that, for the purposes of the duration of the discontinuity allowance, contribution periods that have already given rise to the payment of another unemployment benefit shall not be counted; and the deadline for submitting the application to INPS is changed from March 30 to April 30;

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Topic	Description
	<ul style="list-style-type: none"> the provision that provided for the participation of workers receiving the discontinuity allowance in continuing education and refresher courses in the disciplines of the performing arts is deleted.
Extension of CIGS for enterprises in crisis	<p>It intervenes on the extraordinary wage supplementation treatment for company crisis, if the company has ceased or ceases production activities, referred to in Art. 44 co. 1 of DL 28.9.2018 n. 109, providing:</p> <ul style="list-style-type: none"> the granting also as an exception to the rules contained in Art. 20 co. 3-bis of DLgs. 148/2015, thus not only as an exception to Articles 4 and 22; the extension for 2025 for a maximum period of 12 months and within the limit of 100 million euros.
Extension of CIGS and mobility in derogation in areas of complex industrial crisis	<p>Provision is made for the allocation for 2025 of additional resources for the continuation of extraordinary wage supplementation treatments for the purpose of the completion of employment recovery plans under Article 44 co. 11-bis of Legislative Decree No. 148 of 14.9.2015, as well as mobility treatments in derogation provided by Article 53-ter of Legislative Decree No. 50 of 24.4.2017, in favor of workers of companies operating in areas of complex industrial crisis.</p>
CIGS for corporate reorganization or crisis	<p>Provision is made for the extension, for the years 2025, 2026 and 2027, of the Extraordinary Wage Guarantee Fund for company reorganization or crisis under Article 22-bis of Legislative Decree 148/2015.</p>
CIGS for enterprises of strategic interest national	<p>An additional period of CIGS is granted, until Dec. 31, 2025, to companies of national strategic interest with a number of employees not less than 1,000 and that have ongoing business reorganization plans that have not yet been completed due to their complexity.</p> <p>CIGS is granted as an exception to Articles 4 and 22 of Legislative Decree 148/2015, in continuity with the protections already authorized. In addition, the procedures and terms of Articles 24 and 25 of DLgs. 148/2015 do not apply to this case.</p>
Integration of the measures support measures for former ILVA employees	<p>The economic integration, for the part not covered, of the CIGS treatment recognized, also for the purpose of vocational training, for the management of the reclamation ex art. 1-bis of DL 29.12.2016 n. 243, in favor of the employees employed at the production plants of the former ILVA Group is extended also for 2025.</p>
Allowance for workers of call centers	<p>It is provided, also for the year 2025, the refinancing, within the expenditure limit of 20 million euros, of the income support measures for call center workers referred to in Art. 44 co. 7 of Legislative Decree 14.9.2015 No. 148.</p>
Allowance for fishing stoppage	<p>A daily allowance of 30 euros is also financed for the year 2025 in favor of each worker employed by companies engaged in sea fishing, including the worker members of small-scale fishing cooperatives under L. 13.3.58 no. 250, in case of suspension from work resulting from temporary cessation measures:</p> <ul style="list-style-type: none"> mandatory; not compulsory.
Exclusion of properties affected by natural disasters from ISEE - Extension	<p>The exclusion of real estate and buildings owned, not serviceable or destroyed as a result of natural disasters, from the assessment of the asset situation indicator for ISEE purposes is extended for 2025 (Art. 5 of Prime Minister's Decree No. 159, Dec. 5, 2013).</p>
Incentives for the	<p>A Fund is established-with an allocation of 500,000 euros annually from the year 2026-</p>

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Topic	Description
implementation of health screening	<p>to incentivize screening and prevention programs for cardiovascular and oncological diseases organized by employers.</p> <p>Employers can use the Fund to incentivize:</p> <ul style="list-style-type: none"> • screening and prevention programs of cardiovascular and oncological diseases; • The related training and information campaigns; • the purchase of semiautomatic and automatic defibrillators. • A special decree will establish the implementing procedures for the Fund..
Determination of the state of disability or inability	<p>It is established that INPS must make the assessment of health requirements in a single visit in case of simultaneous submission of applications for assessments of:</p> <ul style="list-style-type: none"> • civil disability, civil blindness, deafness, deaf-blindness and disability under L. 5.2.92 no. 104 and L. 12.3.99 no. 68; • disability and incapacity under Articles 1, 2, 5 and 6 of L. 12.6.84 no. 222 and Art. 1 co. 8 of DLgs. 30.12.92 no. 503. <p>The application of the provision is limited to the period from 1.1.2025 to 31.12.2025, as well as to the review visits of already recognized benefits scheduled from 1.1.2025 to 31.12.2025, provided that the time interval between the two assessments does not exceed 3 months.</p>
Measures of exit flexibility - Extension	<p>The main forms of flexibility in exit are extended through 2025, such as:</p> <ul style="list-style-type: none"> • the early retirement treatment so-called “Women’s Option”; • the flexible early retirement pension (so-called “Quota 103”); • the social APE. <p>Women's Option</p> <p>The right to the “Women's Option” early retirement treatment referred to in Art. 16 co. 1-bis of DL 4/2019 is extended, allowing access to it to female workers - caregivers, civil disabled at least 74%, laid off or employees of companies in crisis pursuant to Art. 1 co. 852 of L. 296/2006 - who by Dec. 31, 2024 have accrued at least 35 years of contributions and 61 years of statutory age, reduced by one year for each child, up to a maximum of 2 years.</p> <p>“Quota 103” retirement pension</p> <p>The possible access to the flexible early retirement pension regulated by Article 14.1 of DL 4/2019 is extended for 2025, granted to those who possess a minimum age of 62 and a minimum contribution of 41 years (so-called “Quota 103”). These requirements must be completed by Dec. 31, 2025.</p> <p>The social APE</p> <p>The possibility of accessing the social APE provided for in Art. 1 co. 179 - 186 of Law 232/2016, which consists of an allowance provided by INPS to support the income of the worker - caregiver, long-term unemployed, disabled at least 74 percent, engaged in heavy labor - from age 63 years and 5 months until the maturation of the age requirement for an old-age pension, is extended to 2025.</p> <p>This benefit cannot be combined with income from employment or self-employment, with the exception of income from occasional self-employment, up to a limit of 5,000 euros gross per year.</p>
Incentive for the waiver	<p>The incentive granted to those who, despite having accrued - in this case, by Dec. 31, 2025 - the requirements to access it, decide not to benefit from the flexible early retirement under Article 14.1 of DL 4/2019 (so-called “Quota 103”) is re-proposed also</p>

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Topic	Description
<p>“Quota 103” and early retirement</p>	<p>for the year 2025.</p> <p>The incentive in question is also recognized for those who achieve the contribution requirements to be eligible for early retirement.</p> <p>The exercise of this option results in the waiver of the contributory crediting of the employee's share of the IVS contributions, with the consequent termination of any obligation on the part of the employer to contribute the employee's share.</p> <p>The amount corresponding to the employee's share of the contributions, which the employer would have had to pay had the option not been exercised, will then be paid in full to the employee and will not contribute to income for tax purposes.</p>
<p>Use of pension plans complementary for access to retirement under the “pure contributory”</p>	<p>In relation to workers whose first contributory crediting takes effect after 1.1.96 (so-called “pure contributors”), the possibility is allowed to use the value of one or more annuity benefits of supplementary pension forms to contribute to the attainment of the monthly threshold amounts of the social allowance set for access to the old-age or early retirement pension.</p> <p>Provision is also made for the possible modification of the aforementioned threshold amount and monitoring with possible remodulation in the event of higher charges, which concern the hypothesis that the aforementioned option is exercised to access the early retirement pension.</p> <p>Computation of annuity benefits</p> <p>For the sole purpose of attaining the monthly threshold amount of the social allowance established for access to the old-age or early retirement pension, it is permitted as of 2025, in the case of an option for the benefit in the form of an annuity and without prejudice to the minimum amount established by law, to compute, together with the monthly amount of the first basic pension installment, also the theoretical value of one or more annuity benefits of supplementary pension forms requested by the insured.</p> <p>The aforementioned computation may be made only at the request of the insured person.</p> <p>Change in the threshold amount and contribution period for early retirement pension</p> <p>As of 1.1.2030, the minimum value of the accrued pension benefit provided for in Article 24 co. 11 of Decree Law 201/2011 as a condition for the recognition of the early pension benefit is modified, which will have to be equal to 3.2 times - and no longer 3 times - the amount of the social allowance.</p> <p>In addition, for those who use the value of annuity benefits from supplementary pension forms to contribute to the attainment of the monthly threshold amounts of the social allowance for access to early retirement, it is required that:</p> <ul style="list-style-type: none"> • for the purpose of attaining early retirement, the current contribution requirement of 20 years of actual contributions be increased by 5 years from 1.1.2025 and an additional 5 years from 1.1.2030; • the early retirement pension is not combinable, as of the first day on which the pension takes effect and until the requirements for access to the old-age pension are met, with income from employment or self-employment, with the exception of income from occasional self-employment, up to the limit of 5,000 euros gross per year.
<p>Increase of the contribution</p>	<p>Individuals enrolled in the basic mandatory pension forms managed by INPS and lacking pension contribution seniority as of Jan. 1, 2025, are granted the option to pay a surcharge - not exceeding 2 percent - of the pension contribution rate borne by them, in order to increase the individual contribution amount, valid for the purpose of</p>

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Topic	Description
	<p>calculating pension treatment.</p> <p>Contributions paid as a surcharge to the relevant contribution rate are deductible from total income for 50% of the total amount paid.</p>
Access facilitated access to the old age for working mothers	<p>Article 1 co. 40(c) of Law 335/95 is amended, strengthening the mechanism of facilitated access to the old-age pension for female workers with 4 or more children, who will be able to access it with a maximum advance of 16 months instead of 12.</p>
Repeal of the re-liquidation for the self-employed	<p>The possibility, provided for in Article 2-ter of DL 2.3.74 No. 30, is repealed, to re-liquidate at the general regime of employees of INPS the pension treatment already enjoyed in one of the special managements of the same social security institute, relating to self-employed workers (artisans, traders and self-employed workers in agriculture, including professional agricultural entrepreneurs), with consequent recalculation of the treatment.</p>
Retention in service for employees public	<p>With reference to the category of public administration employees and without prejudice to the maintenance of the statutory limits provided by the respective sectors to which they belong, Budget Law 2025:</p> <ul style="list-style-type: none"> • raises from 1.1.2025, where lower, the age requirement for reaching the old-age pension; • repeals the rule that allows Public Administrations to terminate employment contracts, including those of executives, with 6 months' notice, starting from the accrual of the seniority contribution requirement for access to retirement; • provides Administrations with the possibility of requesting the retention of employees whose continued employment is deemed necessary, even beyond the age limit for retirement and no later than the 70th year of age; • extends to all health care professionals in the National Health Service - and not only to medical and health care managers as well as nurses - the rule that allows the submission of an application for authorization for retention in service even beyond the limit of 40 years of actual service, subject to the maximum age limit of 70 years.
Increase special for minimum pensions	<p>Provisions are made for the extension to exhaustion of the transitional increases in minimum pensions - amounting to 2.7% in 2024 - in payment for each of the months up to December 2026, including the 13th month's pay due, with décalage determination of the percentage increase of 2.2% for the year 2025 and 1.3% for the year 2026.</p>
Increase in surcharges social	<p>Limited to the year 2025, the amount of the increase in social surcharges provided for in Article 38 co. 1 of L. 448/2001 for pensioners in hardship conditions who are in the income conditions required to benefit from the said increase.</p>
Failure equalization automatic for the pensions of residents abroad	<p>It intervenes in the area of automatic equalization of pension treatments by providing exceptionally, for the year 2025, that the revaluation will not be recognized to pensioners residing abroad, for treatments with a total amount higher than the minimum INPS treatment.</p>

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4 OTHER MAIN NEW FEATURES

The following is a summary of the other major new features contained in the Budget Law 2025.



Topic	Description
<p>Obligation of PEC for directors of companies</p>	<p>The obligation to indicate their digital domicile at the Companies Registry is extended to directors of incorporated companies.</p> <p>As of Jan. 1, 2025, therefore, all directors of companies, where they do not already have one, will be required to activate a certified electronic mail (CEM) address and indicate it to the Business Registry.</p> <p>With regard to this novelty, however, neither specific deadlines for its fulfillment nor special sanctions for the case in which the obligation remains unfulfilled appear to have been set at present.</p>
<p>Deadlines for the crediting of payments made by means of electronic</p>	<p>With particular regard to payments made by electronic instruments other than credit transfers, an obligation is placed on payment service providers to:</p> <ul style="list-style-type: none"> • credit the daily amounts in favor of the beneficiaries by 12 noon on the business day following the day of receipt of payment orders; • in each case, with value date on the day of receipt of the order itself. <p>Adaptation to the new requirements</p> <p>Payment service providers must comply with the above requirements by 30.6.2025.</p>
<p>Contribution unified for disputes on the subject of ascertainment of Italian citizenship</p>	<p>The unified contribution due for the registration of proceedings in the matter of ascertaining Italian citizenship is set at the amount of 600 euros, instead of the previous amount of 518 euros (Art. 13 co. 1-sexies of Presidential Decree 115/2002).</p> <p>Disputes with multiple parties</p> <p>If the application for ascertainment of Italian citizenship is proposed, in the same trial, by a plurality of parties, each appellant party is obliged to pay the unified contribution in the full amount of 600 euros.</p>

The firm remains available for any clarifications.

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