

To whom it may concern



Reggio Emilia, Jan. 28, 2025

## MEMORANDUM N. 6/2025

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### Deadline/Fulfillment

#### Subject: Annual retention deadline for accounting books and records

**By next Jan. 31, the process of keeping accounting records related to 2023 must be completed.**

#### 1) Premise

Article 7 paragraph 4-quater of Decree Law No. 357 of 10.6.1994 (as amended by Article 12-octies first paragraph of Decree Law No. 34 of 30.4.2019 converted by Law No. 58) **abolished the obligation of annual preservation of accounting records kept with electronic systems** (as is now the case in practically all cases), **introducing**, as an exception to the provisions of Article 7 paragraph 4-ter of Decree-Law No. 357/94, **the obligation of printing only when specifically requested during an audit.**

Thus, accounting records are considered regular, even in the absence of their annual storage in computer or paper form, provided that the data are updated on the electronic media and that, during control, the same are printed immediately, at the request of the competent bodies and in their presence.

The records in question are:

- the journal book;
- the ledgers;
- the inventory book;
- the register of depreciable assets;
- the VAT registers;
- the auxiliary stock records.

#### 2) Answer to interpellation 9.4.2021 No. 236

According to an initial interpretation, the Internal Revenue Service took a contrary view, arguing in interpellation 236/2021 that it was necessary to distinguish between “**keeping**” and “**storage.**”

The records are considered regularly “**kept**” even if they are not printed until the third (sixth for 2019) month following the deadline for filing the tax return for the year to which the records refer, provided that the records are immediately printable upon request by the control bodies during access, inspection or verification.

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Conversely, the same records are considered regularly “**preserved**” if, alternatively:

(a) they are stored electronically by means of substitute storage (the process is completed by digital signature and time stamping);

(b) they are printed on paper;

by the third (sixth for 2019) month following the deadline for filing the tax return for the year to which the records relate.

### 3) Answer to interpellation 17.5.2021 n. 346

In its response to interpellation 346/2021, the Internal Revenue Service noted the novelty introduced by Article 7, paragraph 4-quater of Decree Law 357/1994, as amended by Article 12-octies first paragraph of Decree Law 30.4.2019 no. 34, “allowing to waive the obligation of printing or replacement storage” of the aforementioned registers and, **therefore, that the same no longer have to be compulsorily stored electronically or printed within the third month following the deadline for the submission of the tax return for the year to which the registers refer**, but it is sufficient that the same, during control, be printed with immediacy, at the request of the competent bodies and in their presence.

### 4) Stamp duty

With regard to the discharge of stamp duty for the journal and inventory book, a distinction must be made between whether these records are kept in paper format or with computer systems.

#### a) Storage in paper format

The stamp duty is due for every 100 pages or fraction of 100 pages in the amount of Euro 16.00 (or Euro 32 where the annual endorsement fee is not due as, for example, for sole proprietorships and partnerships), before the register is placed in use, that is, before the printing of the register begins. Payment may be made by applying the appropriate revenue stamps or by payment with mod. F23 using tax code 458T.

#### b) Computer-aided storage

The tax is due in the amount of 16 euros (or 32 euros where the annual endorsement fee is not due, such as, for example, for sole proprietorships and partnerships), for every 2,500 entries or fraction thereof by payment with F24 using tax code 2501 and reporting, as the reference year the year to which the accounting entries refer.

The payment is to be made within 120 days of the close of the fiscal year to which the accounting records refer.

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**5) Suggestion of annual storage by computer or by printing**

Despite the fact that, based on what is written above, it is not mandatory, we still recommend that the books and records be kept annually without waiting for possible audits when there might be problems with the immediate printing.

The Firm remains available for any clarifications.

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