Comploj Vieider Lorenzon
Lechner Zanellato

PDC Partner
Wirtschaftsprüfer und Steuerberater
Dottori Commercialisti

Equity partner
Dott. Lodovico Comploj
Dott. Josef Vieider
Dott. Emilio Lorenzon
Dott. Alessandro Zanellato
Dott. Martin Lechner
Dott. Stefan Lanznaster

Partner
Dott. Nicola Sartori
Dott. Thomas Pichler
Dott. Samuel Vittur

Wirtschaftsprüfer und Steuerberater / Dottori
Dott.sa Elena Gattolin
Dott.sa Sabrina Tabiadon
Dott.sa Monika Mattivi
Dott. Christian Gentilini
Dott.sa Serena Giacomoz
Dott.sa Giulia Fortin
Dott. Luca Crepaz
Dott. Maximilian Crazzolar
Dott. Roberto Convento

Bilanzbuchhalter / Esper
Antonio Gocev

To all
clients

Circular
No. 28/2025

Bolzano, 14 June 2025

<u>Subject: Extension of the deadline for tax payments for businesses and self-employed professionals subject to the reliability indices or the flat-rate scheme from 30 June 2025 to 21 July 2025</u>

The news certainly did not come as a surprise, but the timing did, because in recent years the extension of the deadline for tax payments has mostly come only at the very last moment, in many cases even only after the due date. And now for the good news:

At its meeting last Thursday, the Council of Ministers resolved to postpone all payments for income taxes, for IRAP, for value added tax and related levies which are owed as at 30 June 2025 by businesses and self-employed professionals subject to the reliability indices (keyword ISA) or to the flat-rate scheme, to Monday, 21 July 2025, without any surcharge being due in this respect. Although the decree has not been published in the Official Gazette as at today's date, the Council of Ministers already announced its adoption on 12 June by way of a press release following the meeting, so that one may safely rely on it. Accordingly, the legal position is as follows:

GGI A GLOBAL ALLIANCE OF INDEPENDENT PROFESSIONAL FIRMS

39100 Bolzano / Bozen
via F.Crispi / F.Crispi-Straße 9
tel +39 0471 288333 - info@pdc-partner.it

20121 Milano / Mailand
Foro Buonaparte 70

39036 Stern / La Villa di Badia
Str. Ninz 63
tel +39 0471 847360

Businesses and self-employed professionals subject to the reliability indices or the flat-rate scheme:

The following taxpayers may pay the taxes arising from the 2024 tax return only on 21 July 2025:

- self-employed professionals, including professional partnerships, as well as businesses (sole proprietorships, partnerships and corporations) carrying on an activity for which the reliability indices (ISA) have been issued and for which these are also applicable on the basis of the revenues achieved. For this purpose, revenues in 2024 must not have exceeded 5.164.569 Euro (formerly ten billion Lire). It is irrelevant if, in the specific case, the indices do not apply owing to certain grounds for exclusion (e.g. first or last year of activity);
- the postponement expressly also concerns businesses and self-employed professionals who apply a flat-rate scheme, even though these businesses are excluded from the reliability indices;
- the postponement also applies to the partners and shareholders of the aforementioned businesses, self-employed professionals and companies, to whom the corresponding income is attributed under the principle of transparent taxation. This concerns, for example, the partners of partnerships (OHG, KG) and of transparent corporations, the partners in professional partnerships and the members of family businesses.

By contrast, no benefit from the postponement is available to all businesses and self-employed professionals which in 2024 exceeded the revenue threshold of 5.164.569 Euro or which carry on a main activity for which no ISA indicators at all are provided for. Excluded are therefore above all holding companies and agricultural businesses which are taxed on the basis of cadastral income.

In line with earlier extensions of deadlines, it may be assumed that for the taxpayers concerned the postponement covers not only IRES or IRPEF together with the IRPEF surtax (balance and advance payment), but also the chamber of commerce fees and the contributions to the insurance scheme for craftsmen and traders as well as the balancing payment of value added tax for 2024, insofar as, in the course of the annual VAT return, the option was exercised for payment by the deadline for the tax return. Furthermore, for the taxpayers concerned the extension of the deadline also covers the substitute tax on rents (so-called „cedolare secca“) and IVIE as well as IVAFE, as well as the settlement taxes of 26% under separate taxation and the substitute tax for the revaluation carried out in recent years, and also the new substitute taxes for the so-called advance arrangement (“concordato”).

And one further point is clarified: insofar as payment is not made by 21 July 2025, it may be made up with a small surcharge of 0,4% by 20 August 2025. As a reminder: in the previous year, the first extension was indeed granted until 31 July 2024, but in return the extension for a further 30 days against payment with a surcharge of 0,4% was not applicable.

Individuals:
Individuals who have no income from business or self-employed professional activity, on the other hand, owe the balance and the advance payments for IRPEF income tax as well as for the related regional and municipal surtaxes as at 30 June 2025; furthermore, also the various substitute taxes (e.g. IVIE and IVAFE). With a small surcharge of 0,4%, payment may be made by 30 July 2025.

Corporations:
Corporations which approved their annual financial statements before 1 June 2024 and which, on the basis of their revenues, do not fall within the reliability indices, owe the taxes arising from the tax return on 30 July 2025 and, with a surcharge of 0,4%, on Monday, 30 July 2025.
If, on the other hand, the extended deadline of 180 days has been availed of and the financial statements are approved only in June 2025, the tax must be paid by 30 July 2025 and, with a surcharge of 0,4%, by 29 August 2025.

Incidentally, the decree also contains a series of further amendments to tax law, about which, however, we shall inform you in a separate circular, because the pleasure at the extension of the deadline granted here should not be spoiled straight away!

Yours sincerely
Josef Vieider