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NEWSLETTER APRIL 2026

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HIGHLIGHT

News summary

SUSTAINABILITY REPORTING REQUIREMENTS	• On the 24th of February 2026, the European Council approved the simplification of sustainability reporting (CSRD) and due diligence (CSDDD) requirements as part of the Omnibus I package. Specifically, the document raises the thresholds for mandatory reporting to companies with over 1,000 employees and an annual net turnover exceeding €450 million. For companies from third countries, the requirements will apply only if the parent company generates a turnover exceeding €450 million within the European Union.
THRESHOLD FOR THE FLAT-RATE SCHEME AND ERRONEOUSLY RECEIVED PAYMENTS	• In its response to tax ruling request no. 68/2026, the Italian Tax Office clarified – correcting the position set out in response no. 26/2026 – that payments received in error by taxpayers under the flat-rate scheme and subsequently refunded are not taken into account when assessing the €85,000 threshold.
TRANSFER OF PENALTIES FROM THE DISSOLVED COMPANY TO ITS SHAREHOLDERS	• The Court of Cassation, in its judgment no. 5986/2026, held that the liquidation of a company does not result in the transfer of tax penalties to the shareholders. Indeed, paragraph 2-bis, introduced into Article 2 of Legislative Decree 472/1997, pursuant to which financial penalties relating to the tax affairs of companies or entities, whether or not they have legal personality, are borne exclusively by the company, is not a new provision but a 'clarifying' provision that has clarified and formalised a principle already inherent in the system and, therefore, applies retroactively.

Deadlines for submitting 2026 tax returns and filing payments

All taxpayers are required to submit the Redditi form exclusively online, either directly or through an authorised intermediary. The deadlines for 2026, relating to the 2025 tax year, are summarised below.

FINAL DEADLINE FOR SUBMITTING THE 2026 INCOME TAX RETURN – FOR THE YEAR 2025[1]

Parties of interest		Tax returns		Pagamenti (saldo e 1ª rata acconto)	
		Submission via post offices	**Direct electronic transmission or via intermediaries**	**No surcharge of 0,40%**	**With a surcharge of 0,40%**
Natural persons		**From April 15th to June 30th**	**From April 15th to October 31st**	**June 30th 2026**	**July 30th 2026[3]**
Partnerships and associations under art. 6 D.P.R. 600/1973 (general partnerships, limited partnerships, limited liability partnerships and equivalent entities).					
IRES subjects	Subject to the requirement to prepare financial statements, which must be approved within 120 days of the end of the financial year	Not allowed	**From the 15th of April** and by the last day of the **10th month following** the end of the tax year.	By the last day **of the 6th month following** the end of the tax year (**June 30th 2026**).	Within **30 days**
	Not subject to the requirement to prepare financial statements.				
	Which approve the financial statements **more than 120 days** after the end of the financial year, if they have made use of the extension provided for in Article 2364 of the Civil Code.		**From the 15th April** and by the last day of the **10th month following** the end of the tax year.	By the last day **of the month following the date of approval of the financial statements** or the deadline for their approval (**July 31st 2026**)[1-2]	Within **30 days**

Notes

1. **The deadline for the approval of the financial statements, for entities whose financial year coincides with the calendar year, is 29 June (28 June in a leap year).**
2. **If the financial statements are not approved within the statutory time limit (180 days), the payment must nevertheless be made by the last day of the month following the expiry of that time limit (July 31st).**
3. The 30-day deadline for paying the balance, together with the interest surcharge, begins on the date set for the first payment. Consequently, any extensions to the deadline for the first payment – which may be necessary because it falls on a public holiday – result in the date from which the deadline for payment of the balance plus interest begins being brought forward, thereby extending that deadline (Italian Tax Office Ruling No. 128/E of 6 June 2007).
4. Declarations submitted within 90 days of the deadline are considered valid, subject to the penalties provided for in Articles 2 and 8 of Presidential Decree No. 322 of 22 July 1998. Those submitted more than 90 days late, however, are deemed to have been omitted, but constitute grounds for the collection of any tax due.

Share capital reduction due to losses

Art. 6 D.L. 23/2020 has suspended, for the periods from 2020 to 2022, the obligations arising from losses incurred by companies exceeding 1/3rd of their share capital, thereby temporarily rendering non-mandatory the provisions set out in Articles. 2446, cc. 2 e 3, 2447, 2482-bis, cc. 4-6 e 2482-ter c.c and suspended the cause for dissolution of the company due to a reduction or loss of share capital below the statutory minimum referred to in Articles. 2482, c. 1, n. 4 e 2545-duodecies c.c. ***The deadline*** *by which the loss must be reduced to less than 1/3rd* ***is postponed to the 5th subsequent financial year****; the Shareholders' Meeting approving the financial statements for that financial year must reduce the share capital in proportion to the losses recorded. In relation to the losses incurred during 2020, therefore, the necessary measures must be taken by the deadline set for the 2025 annual financial statements meeting, to be held in 2026. Although the option to avail oneself of this benefit requires a careful assessment of the actual prospects, over the next five years, of absorbing the losses in order to ensure the company's continued operation, practical difficulties may arise. Indeed, in the absence of reserves in the financial statements generated over the following five years that are sufficient to cover the losses, a recapitalisation will be necessary; failing this, alternatives such as a capital reduction (provided it does not fall below the statutory limit) or the conversion or liquidation of the company will inevitably have to be considered.*

TEMPORARY PROVISIONS

Suspension of obligations

- **Losses incurred in the financial years from 2020 to 2022 were not taken into account**:
  - Art. 2446, paragraphs 2 and 3, of the Italian Civil Code, which sets out the procedure to be followed if the share capital of a public limited company (S.p.A.) falls by more than 1/3rd as a result of losses.;
  - Article of the Civil Code concerning the requirements to be met in the event of a reduction in share capital below the statutory limit for public limited companies (S.p.A.);
  - Articles 2482-bis, paragraphs 4, 5 and 6, and 2482-ter of the Civil Code, which regulates the same requirements to be met by limited liability companies (S.r.l.).

Loss recovery

The deadline by which a loss incurred in the periods from 2020 to 2022 that **exceeds 1/3rd of the share capital** – but does not reduce it below the statutory limit – must be reduced to less than 1/3 (as provided for in Articles 2446, (2), and 2482-bis (4) of the Civil Code) is postponed **to the 5th subsequent financial year**.	The shareholders' meeting that approves the financial statements for that financial year must reduce the share capital in proportion to the losses recorded
In the cases provided for in Articles 2447 or 2482-ter of the Civil Code – namely, where losses incurred in the periods from 2020 to 2022 **exceed 1/3rd of the share capital, thereby reducing it below the statutory minimum** – the reduction in share capital and the simultaneous increase thereof to an amount not less than the statutory minimum are deferred **until the end of the 5th subsequent financial year**.	The shareholders' meeting that approves the financial statements for that financial year must adopt the resolutions referred to in Articles 2447 or 2482-ter of the Civil Code.

Five-year period of sterilisation of losses

- Losses carried forward must be offset within the **deadlines for the approval of the financial statements**:
  - **2025, for losses from "2020"**;
  - 2026, for losses from "2021";
  - 2027, for losses from "2022".

Cause of dissolution

Until the date of the shareholders' meeting relating to the closure of the 5th financial year following the relevant financial year, the grounds for the dissolution of the company due to a reduction or loss of share capital referred to in Articles 2484(1)(4) and 2545-duodecies of the Civil Code shall not apply.

Notes to the financial statements

Losses incurred in the financial years from 2020 to 2022 must have been clearly disclosed in the notes to the financial statements, with their origin and movements specified in separate schedules.

Canteen and meal allowances from 2026

The provision of meals to employees can be organised in various ways, including by contracting a specialist company; in some cases, if no such service is available, the employer may grant a substitute allowance. The company and inter-company canteen service is not subject to tax for the employee, whilst substitute benefits, such as meal vouchers, are excluded from the taxable income up to a ***total daily amount of €4*** *(from 1 January 2020, instead of €5.29). This amount increases to* ***€10*** *(from 1 January 2026, instead of €8) where the vouchers are issued in* ***electronic form****.*
Meal vouchers are used during the working day – including Sundays and public holidays – exclusively by employees, whether full-time or part-time, even if their working hours do not include a meal break, as well as by individuals who have entered into a collaborative arrangement, which may not be of an employment nature. Furthermore, the meal voucher does not constitute a benefit in kind since, pursuant to Article 51(2) of the Italian Tax Code (Tuir), the exemption limit of up to €4 must be assessed against the face value; therefore, the face value exceeding €4 is not covered by the exemption provided for in Article 51(3) of the Tuir, exclusively for benefits in kind.
Meal vouchers can be 'accumulated' up to a maximum of 10 per day and used not only to pay for lunch during working hours or at the supermarket, but also at farm stays, farmers' markets and staff shops.

Taxes - Contributions	Categories	Direct management of the canteen	Inter-company canteens	Affiliated establishments[10]	Meal vouchers (substitutes for the canteen)
VAT	Rate	4%[1]	4%[1]	4%	4%[2]
	Tax deductibility[3]	Yes[4]	Yes	Yes[9]	Yes[9]
Income tax	Tax deductibility[5] for the company	Yes[6]	Yes[6]	Yes	Yes
	Tax liability for the employee	No	No	No[8]	**Over € 4,00**[7]
Social security contributions		No	No	No[8]	**Over € 4,00**[7]

Notes

1. Both on any fees charged to the employee by the employer and on any fees owed by the employer to the canteen service contractors.
2. On the amount paid by the employer to the issuing company, whilst the rate of 10% applies to the amount paid by the issuing company to the affiliated establishment, which is deductible for the issuing company.
3. For the employer.
4. Both in respect of the employer's purchases of goods and services and in respect of the fees payable by the employer for the provision of canteen services by third parties on the employer's premises.
5. For the employer, with regard to the costs incurred.
6. Provided that the service is intended for all employees.
7. For each working day; value reduced from 1 January 2020. The amount is **€10 for electronic vouchers** (value increased from **1 January 2026**).
8. See Ministerial Circular No. 316 of 23 December 1997.
9. **From 1 September 2008,** following the amendments to Article 19-bis 1 of Presidential Decree 633/1972 introduced by Decree-Law 112/2008.
10. This can also be achieved by issuing electronic badges or cards that allow the holder to access a daily benefit without the possibility of obtaining cash or benefits other than those specified in the contract. Otherwise, such badges are comparable to meal vouchers.

2026 I.V.S. contributions for artisans and traders

*The contribution rates for funding the schemes for craftspeople and traders for the year 2026 are set at 24%. A contribution for maternity benefits is also payable, set at €0.62 per month. For those enrolled solely in the scheme for traders, an additional **0.48%** must be added to the aforementioned rate, as an additional contribution, for the purposes of compensation for the permanent cessation of trading activities. **The provisions regarding the 50% reduction in social security contributions payable by individuals over the age of 65 who are already retired will continue to apply in 2026.** Article 1, paragraph 186 of Law 207/2024 provided for a 50% reduction in social security contributions payable by workers who, during 2025, enrolled for the first time in one of the special autonomous schemes for artisans and traders receiving business income, including under the flat-rate scheme. The data and amounts required for the payment of contributions due from artisans and traders are published in the Social Security Portal, in the 'F24 Form Data' section, which can be accessed by the taxpayer or their representative. This option also allows you to view and print the form required for making the payment in PDF format.*

ORDINARY DEADLINES 2026	**Fixed rates on the minimum income.**	May 18th 2026 August 20th 2026 November 16th 2026 February 16th 2027
	Percentage rates on the portion exceeding the minimum and up to the maximum **(2026 advance payments).**	June 30th 2026[1] November 30th 2026
	Balance for 2025.	June 30th 2026[1]
FINAL PAYMENT	• The IVS contribution paid by artisans and traders[2]: - is calculated on the **total business income** declared for IRPEF purposes (and not solely on the income derived from the activity entitling them to membership of the relevant scheme); - **is based** on business income generated in the same year to which the contribution relates (for contributions for the year 2026, on 2026 income, to be declared in 2027).	

Notes

1. Deadline extendable by 30 days **with a 0.40% surcharge**, applicable to all cases of offsetting via the F24 form, and not only to those where the taxpayer has an outstanding balance due. The aforementioned 0.40% surcharge must be paid separately from contributions, using the payment reference 'API' (artisans) or 'CPI' (traders) and the INPS code used for the payment of the relevant contribution.
2. The two-year composition agreement does not exempt the taxpayer from their social security contribution obligations, and the agreed taxable base is taken into account for the purposes of determining mandatory social security contributions. This is without prejudice to the taxpayer's right to pay contributions on their actual income if this exceeds the agreed amount, as supplemented in accordance with Articles 15 and 16 of Legislative Decree 13/2024.

Chart No.1 Artisans

Income ranges			Annual
Up to	**€**	**18,808.00** [1]	24%
Over	**€**	**18,808.00**	24%
Up to	**€**	**56,224.00**	
Over	**€**	**56,224.00**	25%
Up to	**€**	**93,707.00** [2]	
Minimum contribution[3]		**Annual**	€ 4,521.36
Maximum contribution		**Annual**	€ 22,864.51

Notes

- Income and the corresponding minimum and maximum contributions must be calculated for **each individual** working in the company; for periods **shorter than a calendar year**, they are calculated on a monthly basis.

1. Minimum income on which the contribution is calculated.
2. For **workers with no contribution history as of December 31st, 1995**, who enrolled in January 1996 or later, the **annual ceiling is €122,295.00**, which cannot be divided into monthly instalments (maximum annual contribution: €30,011.51).
3. The **minimum contribution**, based on the values indicated in the table, includes the contribution for maternity benefits (Art. 49, para. 1 of Law 488/1999), in the amount of €0.62 per month for each person enrolled in the plan, equal to **€7.44** per year.

Chart No. 2 Traders

Income ranges			Annual
Up to	**€**	**18.808,00** [1]	24.48%
Over	**€**	**18.808,00**	24.48%
Up to	**€**	**56.224,00**	
Over	**€**	**56.224,00**	25.48%
Up to	**€**	**93.707,00** [2]	
Minimum contribution [3]		**Annual**	€ 4,611.64
Maximum contribution		**Annual**	€ 23,314.31

Notes

- Income and the corresponding minimum and maximum contributions must be calculated for **each individual** working in the company; for **periods shorter than a calendar year**, they are calculated on a monthly basis.

1. Minimum income on which the contribution is calculated.
2. For **workers with no contribution history as at 31 December 1995**, who joined the scheme in January 1996 or later, the **annual ceiling is €122,295.00**, which cannot be divided into monthly instalments (maximum annual contribution €30,598.53).
3. The minimum contribution, based on the figures shown in the table, includes the contribution for maternity benefits (Article 49(1) of Law 488/1999), amounting to €0.62 per month for each person enrolled in the scheme, equivalent to **€7.44** per year.

DEADLINE

Main obligations for April 2026

Deadline	Tribute/ Contribution	Description
Friday April 10th	**Contribution**	**M. Negri, A. Pastore Fund (formerly Previr Fund), M. Besusso** - Payment of contributions to private-sector pension funds for executives of commercial companies, relating to the January–March 2026 quarter.
Wednesday April 15th	**VAT**	**Cumulative Invoice**- For transactions (including the provision of services) carried out in the same calendar month, towards the same person, a single invoice may be issued no later than the 15th day of the month following the execution of the transactions.
		Transactions with foreign countries - For transactions involving the supply of goods and services made and received, as of 1st July 2022, to and from parties not established in the territory of the State, resident VAT operators shall transmit the data to the Tax Office using the Xml format envisaged for electronic invoices and sending the files to the Inter-Exchange System in accordance with the compilation rules envisaged by the technical specifications attached to the provision of 30th April 2018. It follows that the transmission of **active invoices** to persons not established in Italy must take place within the legislative deadlines established for the issuance of invoices (in general, **12 days from the date of execution of the transaction** or a different deadline established by specific provisions such as deferred invoices, etc.), while that referring to **passive invoices** received from foreign suppliers must be made by the **15th day of the month following the month** in which the document proving the transaction was received or the transaction was carried out.
Thursday April 16th	**Direct taxes**	**Withholding tax payment**- Deadline for the payment of withholding taxes made in the previous month concerning income from employment, self-employment, on commissions, on other capital income and in relation to contracts and subcontracts. By this deadline must also be made the payment of withholding taxes made by condominiums as withholding agents if the amount is € 500.00 or more (Art. 1, c. 36 L. 232/2016), as well as the payment of withholding taxes made in relation to short leases (Artt. 4, cc. 1/5-bis e 6 D.L. 50/2017).
	VAT	**Settlement and payment** - Deadline given to monthly taxpayers to make the settlement for the previous month and to pay any debit tax.
		Payment - Deadline for payment, either in a single instalment or as the 1st instalment, of the VAT liability arising from the annual return, where the relevant amount exceeds €10.33 (€10.00 following rounding in the return).
	Inps	**Social security and welfare contributions** - Payment of contributions for the previous month using the F24 form.
		Ex-Enpals - Companies in the entertainment and sports sector must make the payment, using form F24, of the Enpals contributions due for the pay period ending the previous month.
Saturday April 25th[1]	**VAT**	**Intrastat lists** - Deadline for submitting electronically the lists of intra-Community supplies, purchases of goods and services for the previous month.

Main obligations for April 2026 (following)

Deadline	Tribute/ Contribution	Description
Thursday April 30th	**VAT**	**Annual VAT return** - Deadline for submitting the VAT return for the year 2025.
	Single Certification	**Self-employment** - Deadline for submitting certificates relating to self-employment income and commissions for non-occasional services to the Italian Tax Office.

Note[1]	• **If the deadline falls on a public holiday, it's extended to the next non-holiday (art. 2963, c.** 3 c.c.). • The art. 18, c. 1 Legislative Decree 9th July 1997, no. 241 establishes that the payments that fall on Saturday or on a public holiday are timely if completed on the 1st next working day. • Deadlines for the submission and transmission of declarations that expire on a Saturday are automatically extended to the first next working day (art. 2, c. 9 D.P.R. 322/1998). • Fulfilments and payments provided by provisions relating to matters administered by articulations of the Ministry of Economy and Finance, including the Tax Offices, even if provided for exclusively by telematic means, which must be made to the same articulations or at their offices, which deadlines expire on a Saturday or public holiday, are extended to the next first working day [art. 7, c. 2, lett. l) D.L. 13 May 2011, no. 70].