Italy Implements New Compliance Framework for the Global Minimum Tax (Pillar Two)

Descrizione

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Italy has taken a decisive step in implementing the Global Minimum Tax (GMT) by introducing a structured set of compliance obligations for companies that belong to large multinational groups. The decree issued on 7 November 2025 defines how Italian entities must prepare, file, and pay the various components of the minimum tax under the OECD Pillar Two framework.

A key point clarified by the decree is who is actually subject to these obligations. The rules apply to Italian resident entities that are part of multinational or national groups with consolidated annual revenues of at least â?¬750 million, calculated according to the criteria used for the groupâ??s consolidated financial statements. This includes parent companies, controlled subsidiaries, permanent establishments in Italy of foreign groups, and Italian sub-holding companies. In practice, any Italian entity belonging to a group that meets the â?¬750m revenue threshold will fall within the scope, regardless of its own individual size. Smaller Italian subsidiaries of a large multinational group are therefore fully covered by the GMT obligations even if their local turnover is modest.

For these qualifying entities, Italy now requires the submission of a dedicated â??minimum tax return.â?• The model is a unified declaration consisting of a general section with identification and group information, plus annexes specific to each form of minimum tax introduced by domestic legislation. Importantly, the obligation to file applies even when no additional tax is due. This ensures full transparency for the Italian tax authorities and alignment with the global GloBE reporting structure.

The decree also outlines the technical rules for preparing the return. All amounts must be expressed in euros, with mandatory conversion for companies reporting in foreign currency. Payments will be executed via the F24 form using new tax codes issued by the Agenzia delle Entrate.

Deadlines have been set to balance the need for compliance and the complexity of implementation. As a general rule, the return must be filed within fifteen months of the end of the fiscal year. During the first year of application, this period is extended to eighteen months to help groups adapt their internal processes and coordinate with foreign headquarters.

Penalties align with Italyâ??s standard tax-administration framework, but the law provides a temporary â??soft-landingâ?•: for the first three years of the regime, penalties do not apply unless there is intentional misconduct or serious negligence. However, responsibility remains significant, as Italian entities may be jointly and severally liable alongside other relevant group companies.

For multinational groups operating in Italy, this marks the beginning of a new compliance environment. Companies must immediately verify whether the group exceeds the â?¬750m threshold, identify the Italian entity responsible for filing, and adjust internal systems to collect the data required by the GloBE model. Coordination with parent companies becomes essential to ensure consistency between global minimum-tax calculations and the Italian return. Robust documentation practices will also be crucial, given the expected scrutiny from tax authorities during the first years of application.

In essence, the decree does not simply introduce a new tax formâ??it establishes a full reporting architecture for global minimum tax compliance in Italy. Groups falling within the threshold should begin preparing early, ensuring that data flows, governance structures, and cross-border communication lines are fully aligned with the new rules.

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