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Reggio Emilia, Dec. 5, 2025

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## MEMORANDUM N. 55/2025

### Deadline/ Fulfilment

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#### Subject: 2025 VAT advance payment

Article 6 of Law No. 405 of December 29, 1990, introduced the obligation to pay a VAT advance payment for the last period of the year (month or quarter).

The payment must be made by **Monday, December 29, 2025.**

A. The 2025 VAT advance payment can be determined, as usual, by applying alternatively:

1. the historical method;
2. the method of transactions carried out;
3. the forecast method.

The taxpayer has the right to choose the method that is most favorable to them.

#### 1) Historical Method

The advance payment is equal to 88% of the tax due based on the settlement for December 2024 for “monthly” taxpayers or the fourth quarter of 2024 for ‘special’ (or “by nature”) quarterly taxpayers or the annual return for 2024 for “optional” quarterly taxpayers.

Quarterly taxpayers do not have to take into account the 1% surcharge.

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In order to identify/verify the data that can be used to determine the 2025 VAT advance payment, it should be noted that in the 2025 VAT form, section VH had to be completed only in “exceptional” cases, as the result of the periodic VAT settlement could be inferred from section VP of the communication sent (quarterly) to the Revenue Agency (known as Li.Pe.).

Taxpayer	Reference base	VAT form 2025 (*)
Monthly	Debit balance for December 2024 settlement (line VP14 + VP13)	VH15 + VH17
Monthly“deferred”	Debit balance for December 2024 settlement based on November 2024 transactions (line VP14 + VP13)	VH15 + VH17
Special quarterly (truck driver, fuel distributor)	Debit balance for fourth quarter 2024 settlement (line VP14 + VP13)	VH16 + VH17
Quarterly (annual debit balance)	Debit balance of the 2024 return (balance + advance payment)	VL38 – VL36 + VP13 (VH17)
Quarterly (annual credit balance)	Debit balance without considering the higher 2024 advance payment <b>corresponding to the amount actually due for 2024</b> (difference between advance payment paid and annual VAT credit)	VP13 (VH17) – VL33

(\*) When filling in section VH.

## 2) Method of transactions carried out

According to this method, the amount to be paid, **equal to 100% (not 88%)**, is calculated based on a special advance tax assessment obtained by algebraically adding the following elements:

- (with a + sign) AT payable relating to transactions recorded in the sales register for the period between:
  - December 1 and December 20, 2025, for “monthly” taxpayers (as regards transactions carried out in November 2025 and invoiced and recorded by December 15, 2025, since they are included in the November settlement, they should not be considered for the purposes of calculating the advance payment);
  - October 1 and December 20, 2025, for “quarterly” taxpayers”;
- (with a + sign) the VAT payable on transactions carried out, even if not yet invoiced or recorded, for the period between:
  - December 1 and December 20, 2025, for “monthly” taxpayers;
  - October 1 and December 20, 2025, for “quarterly” taxpayers;
- (with a - sign) VAT credit relating to purchases and imports exclusively recorded in the purchase register during the period between:
  - December 1 and December 20, 2025, for “monthly” taxpayers;

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- October 1 and December 20, 2025, for “quarterly” taxpayers;
- (with a - sign) VAT credit relating to intra-Community transactions, for which the corresponding VAT debit has already been taken into account (as a result of double entry);
- (with a - sign) any VAT credit carried forward from the settlement relating to the previous period (November 2025 or third quarter of 2025).

Please note that, pursuant to Article 6 of Presidential Decree 633/72, the sale of movable property is considered to have taken place at the time of delivery or shipment. However, if, prior to that time, an invoice is issued in whole or in part, the transaction is considered to have taken place - limited to the invoiced amount - on the date of the invoice.

The provision of services is considered to have taken place on the date of issue of the invoice, which can never be later than the date of receipt of payment.

It is advisable to record the settlement calculated in this way in the register of invoices issued/payments received, even if there is a credit balance, in order to verify the data in the event of a subsequent audit.

### 3) Forecast method

If the taxpayer believes that the VAT for December 2025 (for “monthly” taxpayers) or the fourth quarter of 2025 (for ‘special’ quarterly taxpayers) or for the current year's return (quarterly taxpayers “by option”) is less than that due for the corresponding periods of 2024 (see point 1 above), the advance payment can be determined by applying 88% to this estimated tax.

In this regard, please note that:

- a) Article 23, first paragraph, of the VAT Decree, as amended by Article 3, first paragraph, of Decree Law No. 557 of December 30, 1993, converted into Law No. 133 of February 26, 1994, provides that “immediate” invoices, although they may be recorded within 15 days of their issue and, therefore, for those issued in the second half of the month, even in the following month, they contribute to the settlement of the month of issue (and not of registration);
- b) Article 21, fourth paragraph, second subparagraph, and Article 23, first paragraph, as amended by Article 3, first paragraph, letters a) and b) of Decree Law 29/09/97 no. 328, converted into Law No. 410 of November 29, 1997, provide that “deferred” invoices may be issued and recorded by the 15th day of the month following that of delivery or shipment, but that they must be taken into account in the settlement for the month of delivery.

These provisions must be taken into account when calculating the estimated VAT.

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**B. The following are not required to pay the advance payment:**

- those who started their business in 2025;
- “monthly” taxpayers who ceased trading by November 30, 2025;
- “quarterly” taxpayers who ceased trading by September 30, 2025;
- taxpayers who closed their December settlement (“monthly”) or last quarter settlement (“special quarterly”) or their 2024 return (“optional quarterly”) with a credit balance;
- taxpayers who, in application of the method illustrated in point B) no. 2 above (method of transactions carried out), close the relevant settlement with a credit balance;
- taxpayers who expect to close the December settlement (“monthly”) or the last quarter (“special quarterly”) or the 2025 declaration (“optional quarterly”) with a credit balance;
- taxpayers who have carried out only transactions that are exempt or not taxable for VAT purposes;
- taxpayers who adhere to the preferential regime for young entrepreneurs referred to in Article 27, paragraphs 1 and 2, of Decree Law No. 98 of July 6, 2011;
- taxpayers who benefit from the flat-rate regime pursuant to Article 1, paragraphs 54-89, of Law No. 190/2014;
- taxpayers under the agricultural exemption scheme pursuant to Article 34(6) of Presidential Decree No. 633/72;
- taxpayers engaged in entertainment activities pursuant to Article 74(6) of Presidential Decree No. 633/727;
- Taxpayers who have left the minimum/flat-rate regime since January 1, 2025, with application of the ordinary regime;
- Amateur sports clubs and associations and associations in general that apply the flat-rate regime referred to in Law 398/91.

**C. The VAT advance payment must be paid only if the amount is equal to or greater than €103.29.** *it cannot be paid in installments but can be offset against excess taxes and contributions credited under the REDDITI 2025 form (within the legal limits for the calendar year).*

For payment, all parties must use form F24, indicating the following tax codes:

- **6013** for “monthly” taxpayers;
- **6035** for “quarterly” taxpayers.

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The reference year is 2025.

Amounts must be rounded **to the nearest euro cent.**

Quarterly taxpayers do not have to add 1% interest to their advance payment.

**D. A penalty of 25%** is applicable for failure to pay or insufficient payment of the VAT advance. The violation can be regularized through **voluntary disclosure**, with payment of the reduced penalty as follows:

**Dal 0,0833% al 1,1667%:** within 14 days of the due date, bearing in mind that 0.0833% is applied for each day of delay;

**1,25%:** between the 15th and 30th day after the deadline;

**1,3889%:** within 90 days of the deadline;

**3,125%:** by the deadline for filing the return for the year of the violation (for the 2025 VAT advance payment, therefore, by April 30, 2026).

Upon regularization, in addition to the tax due and the reduced penalty (tax code "8904"), interest at the rate of 0.01% per annum (tax code "1991") must also be paid.

E. If, as a result of the change in turnover, the payment frequency has changed between 2023 and 2024 (from monthly to quarterly or vice versa) and the method described in point B) no. 1 above (historical method) is to be applied, the reference terms for determining the advance payment are as follows:

- in the case of a change from quarterly to monthly taxpayer, reference should be made to one third of the tax due based on the settlement for the fourth quarter of 2024 (special quarterly payments) or the 2025 VAT return (optional quarterly payments);
- in the case of a transition from monthly to quarterly taxpayer, reference should be made to the total amount of payments made for the months of October - November - December 2024, net of any deductible surplus emerging from the settlement for the month of December of that period (VP14 October/November/December settlement + VP13 December settlement).

F. For those who carried out **extraordinary transactions** during 2025, Article 4 of Decree Law No. 11/03/1997, No. 50, converted by Law No. 122 of May 9, 1997, establishes that in mergers and demergers, the payment obligations, including those relating to tax advances, of entities that are extinguished as a result of such transactions, are fulfilled by the same entities until the effective date of the merger or demerger; after that date, the aforementioned obligations are considered to be transferred for all purposes to the incorporating company, beneficiary or otherwise resulting from the merger or demerger. In the event of a merger, therefore, the resulting company or the incorporating company assumes, on the date on which the transaction takes effect, the rights and obligations existing in relation to the merged or incorporated companies, which are extinguished as a result of the merger itself.

G. Under the **group VAT regime**, the parent company pays the advance payment for all companies in the group, taking into account its own data and that of its subsidiaries. Subsidiaries are required to provide the parent company with all the data necessary to calculate the advance payment. The parent company will compare the estimated total with the group's historical data.

If the group's composition changed during the year:

- companies that left the group will determine the advance payment independently, and the parent company will not take the data of these companies

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into account in its own settlement;

- companies that joined the group will provide the parent company with forecast and historical data, in order to integrate the overall historical data for the group.

H. In the event of voluntary liquidation, the advance payment is due. However, given the decrease in active invoicing linked to the prohibition on carrying out new transactions, it may be appropriate to calculate using the forecast method.

I. In the event of bankruptcy, composition with creditors, receivership, and compulsory liquidation, the advance payment is due, without prejudice to the possibility of paying a lower advance payment based on forecasts for the reference period of the current year.

It should be noted that, pursuant to Article 74-bis, paragraph 2, of Presidential Decree No. 633/1972, in the event of bankruptcy or compulsory liquidation, the obligations must be fulfilled by the trustee or liquidator.

J. The amount paid as an advance payment must then be deducted from:

- the settlement for December 2025 for “monthly” taxpayers;
- the annual VAT return for “optional” quarterly taxpayers (required to pay VAT for the fourth quarter, together with any annual adjustment, by March 16, 2026);
- the settlement for the fourth quarter for ‘special’ quarterly taxpayers (required to pay VAT for the fourth quarter by March 16, 2026)

The Firm remains available for any clarifications.

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