

Italy: publication of GloBE Information Return form and filing instructions

Tax & Legal Alert

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Entities located in Italy, as well as stateless entities established under Italian law, must submit a *Comunicazione Rilevante* (GloBE Information Return) 15 months after the end of the fiscal year (18 months for the first year of application of the Pillar Two rules to the group), regardless of whether a top-up tax is due, or simplification regimes apply.

A **Ministerial Decree of 16 October 2025** (the “**Decree**”), published on 17 October 2025, introduced the standard form to be used for the *Comunicazione Rilevante*, to ensure the proper exchange of information with jurisdictions that have entered into a qualifying competent authority agreement¹. This agreement among EU Member States is implemented through DAC9², enabling the centralised filing of the *Comunicazione Rilevante*. Outside the EU, the exchange of information with third countries will instead be governed by the Multilateral Competent Authority Agreement on the Exchange of GloBE Information (MCAA), [updated](#) in October 2025.

On **30 October 2025**, the **Ministry of Economy and Finance (MEF)** published detailed **guidelines** on how to complete the *Comunicazione Rilevante*, in line with the OECD framework.

The Decree specifies that entities are exempt from filing if they identify a designated local entity, a designated entity, or the ultimate parent entity that files the *Comunicazione Rilevante* on their behalf. The entity that actually submits the *Comunicazione Rilevante* is the reporting entity.

The designated entities and the ultimate parent entity cannot be located in a QDMTT jurisdiction (a jurisdiction that has implemented only a domestic minimum top-up tax).

Where multiple jurisdictions, for the same fiscal year, have taxing rights over a multinational group with respect to a jurisdiction, the reporting entity located in Italy must prepare the *Comunicazione Rilevante* in accordance with the OECD rules. Where discrepancies are identified between the OECD rules and those adopted by jurisdictions having taxing rights, the reporting entity shall report the above discrepancies, and the Italian Tax Authorities may ask the group for additional information.

1) The template for the form can be found in Annex 1 of the Decree.

2) Council Directive (EU) 2025/872 of 14 April 2025 amending Directive 2011/16/EU on administrative cooperation in the field of taxation.

However, where a single jurisdiction has taxing rights with respect to a jurisdiction the *Comunicazione Rilevante* should be completed based on the domestic legislation of the jurisdiction with those taxing rights.

The *Comunicazione Rilevante* consists of a general section and jurisdictional sections.

- i. The general section includes overall information on the multinational or domestic group, its structure, and the identity of the reporting entity.
- ii. The jurisdictional sections provide information for each jurisdiction in which the group operates, including details on the application of safe harbour or exclusion regimes. Where such regimes do not apply, the sections indicate the amount of top-up tax due, the calculations made to determine it, and its allocation.

The *dissemination approach* is ruled out. This is in line with the DAC and OCED provisions, according to which:

- the ultimate parent entity is provided with the *Comunicazione Rilevante* as a whole;
- the jurisdictions with taxing rights are provided with the sections that relate to the ETR and top-up tax computation, allocation and attribution for those jurisdictions in respect of which they have taxing rights;
- all implementing jurisdictions where constituent entities of the MNE Group are located are provided with general information and the corporate structure, which covers all the data points necessary to verify whether they have any taxing rights (alternatively, the reporting entity may choose to provide all the information to each implementation or QDMTT jurisdiction in which the group entities and jointly controlled entities are located).

Key points

Filing: the Revenue Agency will establish the procedures for electronically filing the *Comunicazione Rilevante*.

Exchange of information: the Revenue Agency automatically exchanges the information in the *Comunicazione Rilevante* with each EU Member State and with any jurisdiction that has a qualifying competent authority agreement in force. The information must be exchanged no later than three months (six months for the first fiscal year in which a qualifying competent authority agreement is in force) after the submission of the *Comunicazione Rilevante*.

Deadline: 15 months after year-end (18 months for the transitional year but not before 30 June 2026, regardless of the group's year-end).

Corrections/cancellations: possible within the above deadline, to replace or cancel prior notification forms.

Penalties: EUR100,000 for not submitting the form at all or submitting it more than three months late; EUR10,000-EUR50,000 for submitting an incorrect form or submitting it late (up to three months after the deadline). In aggregate, the penalties will not exceed EUR1 million for all multinational or national group companies located in Italy. For the first three fiscal years, the penalties will be halved.

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