



# Italy: new deadline for transfer pricing documentation

**Tax & Legal Alert**  
17 January 2024

## Office

### Milan

Via Vittor Pisani 31, 20124  
T: +39 02 676441

### Ancona

Via I° Maggio 150/a, 60131  
T: +39 071 2916378

### Bologna

Via Innocenzo Malvasia 6, 40131  
T: +39 051 4392711

### Florence

Viale Niccolò Machiavelli 29, 50125  
T: +39 055 261961

### Genoa

P.zza della Vittoria 15/12, 16121  
T: +39 010 5702225

### Naples

Via F. Caracciolo 17, 80122  
T: +39 081 662617

### Padua

Piazza Salvemini 2, 35131  
T: +39 049 8239611

### Perugia

Via Campo di Marte 19, 06124  
T: +39 075 5734518

### Pescara

P.zza Duca D'Aosta 31, 65121  
T: +39 085 4210479

### Rome

Via Curtatone 3, 00185  
T: +39 06 809631

### Turin

C.so Vittorio Emanuele II 48, 10123  
T: +39 011 883166

### Verona

Via Leone Pancaldo 68, 37138  
T: +39 045 8114111

On 12 January 2024, Legislative Decree no. 1/2024 - regarding the rationalization and simplification of certain tax rules - was officially published in the *Gazzetta Ufficiale*.

Among other things, there is a new tax calendar. From 2 May 2024, taxpayers will have to file their income tax return within nine months of the financial year-end and no longer within 11 months. Calendar-year taxpayers will therefore have to file their tax return for 2023 electronically by 30 September 2024.

This has direct and significant implications for transfer pricing (TP) compliance. TP documentation required for penalty protection purposes must be ready before the income tax return is filed. Moreover, TP documentation must be:

- digitally signed by the legal representative of the Italian entity (using digital signatures legally recognized by the tax authorities in Italy);
- digitally timestamped before the income tax return is filed.

The new filing deadline means that, from January 2024, taxpayers will have to reorganize and update their annual schedules as a matter of urgency, since they will have two months less to comply with Italian tax requirements and prepare their TP documentation.

## Contacts

### KPMG in Italy, Tax & Legal Transfer Pricing

**Gianni De Robertis**

Partner

[gianniderobertis@kpmg.it](mailto:gianniderobertis@kpmg.it)

**Filippo Bertoletti**

Partner

[fbertoletti@kpmg.it](mailto:fbertoletti@kpmg.it)

**Lucia Barone**

Partner

[lbarone@kpmg.it](mailto:lbarone@kpmg.it)

[kpmg.com/it](https://kpmg.com/it)

[kpmg.com/it/socialmedia](https://kpmg.com/it/socialmedia)



Tax & Legal Alert / KPMG in Italy / 17 January 2024

© 2024 Studio Associato - Consulenza legale e tributaria, an Italian professional partnership and a member firm of the KPMG global organization of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.

The KPMG name and logo are trademarks used under license by the independent member firms of the KPMG global organization.

Studio Associato - Consulenza legale e tributaria is a leading Italian law firm and a member firm of KPMG International for tax and legal services.

The information contained herein is of a general nature and is not intended to address the circumstances of any particular individual or entity. Although we endeavour to provide accurate and timely information, there can be no guarantee that such information is accurate as of the date it is received or that it will continue to be accurate in the future. No one should act on such information without appropriate professional advice after a thorough examination of the particular situation.