



# Changes in the 2025 corporate income tax return. Publication of the CIT and NRIT return forms for 2025

Tax Alert



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# Changes in the 2025 corporate income tax return.

## Publication of the CIT and NRIT return forms for 2025

The 2025 Order adapts forms 200 and 220 to reflect the latest regulatory developments.

[Ministry of Finance Order HAC/529/2026 of 7 May 2026](#), approving the corporate income tax (CIT) and non-resident income tax (NRIT) return forms for permanent establishments and pass-through entities with a presence in Spain for tax periods commenced between 1 January and 31 December 2025 has been published in the Official State Gazette (BOE).

- **Form 200: CIT return and NRIT return (Appendix I)**
- **Form 220: CIT return – Tax consolidation regime for tax groups (Appendix II)**

The Order also sets out instructions regarding the declaration and payment procedure and the conditions for online filing. Broadly speaking, it will enter into force on 1 July 2026.

As usual, the tax returns have been published along with the forms to be used to report additional information requested by the STA on:

- Adjustments to the income statement and tax credits involving amounts equal to or exceeding Euros 50,000 (**Appendix III**).
- Discounts in social security contributions for research personnel (**Appendix IV**).
- The Canary Islands investment reserve (**Appendix V**).
- The Balearic Islands investment reserve (a new form, included in **Appendix VI**).

CIT returns (forms 200 and 220) must be filed within 25 calendar days of the end of the six-month period following the conclusion of the tax period.

These forms reflect the regulatory changes affecting corporate income tax for 2025, which are set out below.

### ➤ Main legislative changes affecting tax periods commenced in 2025.

Among the changes affecting the 2025 CIT return, we would highlight the following:

#### Capitalisation reserve

[Law 7/2024 of 20 December 2024](#) introduced significant changes to the rules governing the capitalisation reserve provided for in article 25 of the Corporate Income Tax Law.

With effect for tax periods that began on or after 1 January 2025, the rules governing this incentive—whereby the tax base may be reduced by a percentage of the increase in equity, subject to certain conditions—have been improved.

- The **percentage of the reduction has been increased** from 15% to 20% – and may even be higher, up to a maximum of 30%, subject to an increase in employment.
- The **maximum limit** on the reduction of preliminary tax payable by the amounts allocated to the capitalisation reserve has been **increased** from 10% to 20% (and 25% in the case of micro-enterprises).

% as of 1 January 2025	Increase in the average workforce compared with the average workforce for the previous tax period	Additional requirement
20%	N/A	N/A
23%	Average increase in the workforce of between 2% and 5%	Maintenance of the increase in the workforce for the three years following the end of the period
26.5%	Average increase in the workforce of between 5% and 10%	
30%	Increase in the workforce exceeding 10%	

Previously, in 2024, another amendment was introduced to improve the incentive: Effective for tax periods commenced as of 1 January 2024, Royal Decree-Law 4/2024 increased the reduction rate from 10% to 15% while reducing the period for which the increase in the entity's equity is to be maintained from 5 to 3 years.

#### Reduced tax rates

For tax periods commenced on or after 1 January 2025, the Law introduces new reduced CIT rates for:

- Taxpayers whose revenues for the prior tax period fell below Euros 1 million.

For these purposes, regard should be had to the rules set out in article 101.2 and 101.3 of the CIT Law. Revenues will be calculated on an annual basis if the business activity commenced during the tax period or if the immediately preceding tax period lasted less than one year; in such cases, the revenues of all entities forming part of a group per article 42 of the Commercial Code shall be taken into account.

It also sets out how to determine the portion of an entity's tax base that is taxed at the reduced rate where the tax period is less than one year.

- Taxpayers classed as small companies, per the terms of article 101 of the CIT Law.

The lowering of the reduced tax rates is to be staggered over several tax periods, as shown in the table below:

Year	Micro-enterprise	Small companies
2025	Tax base between €0 and €50,000: 21% Remaining tax base: 22%	24%
2026	Tax base between €0 and €50,000: 19% Remaining tax base: 21%	23%
2027	Tax base between €0 and €50,000: 17% Remaining tax base: 20%	22%
2028	Tax base between €0 and €50,000: 17% Remaining tax base: 20%	21%
Thereafter	Tax base between €0 and €50,000: 17% Remaining tax base: 20%	20%

- Article 29.2 of the CIT Law, relating to the CIT rate applicable to cooperatives subject to preferential

tax treatment, was also amended with effect from the tax period commenced on or after 1 January 2025.

Such entities will be taxed at the rate obtained by reducing the tax rates set out in article 29.1 of the CIT Law by 3 percentage points, provided that the resulting rate does not exceed 20%.

Income from non-cooperative activities will be taxed at the rates set out in article 29.1 of the CIT Law.

Meanwhile, in the case of credit cooperatives and rural savings banks, the tax rates will be those set out in article 29.1 of the CIT Law, except in respect of non-cooperative income, which will continue to be taxed at a rate of 30%.

- Other reduced rates:

Bear in mind that the CIT Law provides for other reduced tax rates, such as the 15% rate that may be applied by newly created entities in the first tax period in which they recognise taxable income and in the following tax period, and the 15% rate for start-ups.

### Amendment of the minimum tax payable under article 30 bis

The minimum net tax payable under article 30 bis is amended having regard to the new tax rates.

### Reserve for Investments in the Canary Islands

The tax form reflects the amendments introduced by Law 7/2024 and Law 6/2025, which expand upon and clarify the ways in which the reserve for investments in the Canary Islands may be utilised.

New investment options are included relating, inter alia, to the refurbishment of subsidised housing for rental to persons registered on the Public Register of Applicants for Subsidised Housing in the Canary Islands.

### Non-deductible expenses

Effective for tax periods commenced on or after 1 January 2025, the tax on the net interest and commission income of certain financial institutions is no longer deductible for CIT purposes.

This has called for specific adjustments to the return.

### Events of exceptional public interest

The adoption of Royal Decree-Law 8/2025 has led to the inclusion of new events of exceptional public

interest, with the corresponding impact on the tax incentives for patronage.

### National Classification of Economic Activities

The tax form reflects the update to the National Classification of Economic Activities (CNAE-2025) and taxpayers are thus required to review the code for their principal activity.

### Extension of exceptional tax measures: unrestricted amortisation and depreciation

The Order highlights the need to factor in the effects of certain measures implemented while various Royal Decree-Laws that were ultimately not ratified were in force.

Specifically, it refers to article 17 of Royal Decree-Law 16/2025 of 23 December 2025 and article 13 of Royal Decree-Law 2/2026 of 3 February 2026, which, as regards corporate income tax, concern:

- the unrestricted amortisation and depreciation of investments in facilities that use energy from renewable sources; and
- the unrestricted depreciation of certain vehicles and charging infrastructures.

Both of the above pieces of legislation temporarily extended the application of these tax incentives to tax periods that began on or after 1 January 2025. Although they were not ultimately ratified, they had legal effect whilst they were in force, and this should be taken into account for the purposes of the investments made having regard to such measures during that period.

The Order also states that regard should be had to Royal Decree-Law 7/2026 of 20 March 2026, which introduces a corporate income tax measure designed to ensure the continuity of these tax incentives associated with the energy transition, effective for tax periods commenced on or after 1 January 2025 that had not ended by the date of its entry into force, on 22 March 2026.

### ➤ Other changes included in form 200 (and, consequently, in form 220)

In addition to the amendments resulting from regulatory changes, the forms approved for the 2025 campaign include a number of technical updates designed to improve the quality and consistency of the information provided. In this connection:

- The section relating to corporate groups on page 1 bis of the form is adapted to include

new categories of entities related to multinational enterprise groups and large-scale domestic groups in line with the obligations in respect of the top-up tax.

Otros caracteres	
<input type="checkbox"/>	00007 Imputación en base imp. rentas positivas art. 100 LIS
<input type="checkbox"/>	00009 Entidad dominante de grupo fiscal
<input type="checkbox"/>	00010 Entidad dependiente de grupo fiscal
<input type="checkbox"/>	00081 Filial grupo multinacional o grupo nacional de gran magnitud
<input type="checkbox"/>	00082 Sociedad matriz última grupo multinacional o grupo nacional de gran magnitud

- Changes are introduced to the **information** required in respect of **economic interest groupings and joint ventures**.

**Completion of the “Members of economic interest groupings and joint venture” chart** (page 24 bis of form 200), which was previously voluntary, is now mandatory, with more detailed information on economic interest groupings.

- Improvements have been made to the procedure for **rectifying self-assessments** in form 200.

It is worth recalling that the rectifying self-assessment option (approved by Law 13/2023 of 24 May 2023 and implemented by Royal Decree 117/2024) was included in corporate income tax form 200 for the first time by virtue of Ministry of Finance Order HAC/657/2025 of 21 June 2025. Form 200 was thus amended to include the options necessary to enable taxpayers to rectify, complete or amend a self-assessment already filed by filing a new rectifying self-assessment.

However, although Article 59.5 of the Corporate Income Tax Regulations provides for the submission of rectifying self-assessments at both individual level and tax group level where taxpayers are taxed under the tax consolidation regime, this option was not included in form 220 for tax groups.

This remains the case in the forms approved for 2025.

- **New warning messages and validation checks** are introduced to ensure the consistency of the information provided, particularly in scenarios such as financial years lasting less than twelve months or disclosures concerning economic interest groupings and joint ventures.

## 5 Changes in the 2025 corporate income tax return.

- The option to file the **return in a machine-readable format (XML)** has been introduced for taxpayers subject to the provincial tax regulations in force in the Basque Country and Navarra. This will enable greater automation in the exchange of information and improve data traceability, thereby reducing potential processing errors.
- Finally, no significant changes have been made to the additional forms used to provide information on specific adjustments and tax credits, research staff, and reserves for investments in the Canary Islands and the Balearic Islands.

### ➤ Filing method

Taxpayers are required to file their self-assessments **online** using a recognised electronic certificate (article 2.a) of Ministry of Finance [Order HAP/2194/2013](#)).

### ➤ Filing period

As regards the filing period<sup>1</sup>:

- For entities whose tax period coincides with the calendar year, this will generally run from 1 to 27 July 2026. If the taxpayer opts for direct debit, the deadline is 22 July 2026.
- All other entities must file their returns within 25 calendar days of the end of the six-month period immediately following the conclusion of the tax period.

Taxpayers whose filing period began prior to the entry into force of this Order must file their returns within 25 calendar days of its effective date, **unless** they have opted to file their returns using the forms included in Ministry of Finance Order HAC/657/2025 of 21 June

2025, approving forms 200 and 220 for tax periods commencing between 1 January and 31 December 2024. In this case, tax returns must be filed within 25 calendar days of the end of the six-month period immediately following the conclusion of the tax period.

**Form 220** is to be filed within the filing period established for the individual tax return of the tax group's representative or parent.

Finally, article 6.2 of the Order provides for a specific filing period for permanent establishments and pass-through entities incorporated abroad that have a presence in Spain where their tax period is terminated in any of the scenarios regulated by article 20.2 of the Revised NRIT Law.

### ➤ Other matters

Finally, with regard to the obligations arising in respect of the **Top-up Tax**, **the deadline for direct debit payments due under form 242 has been extended to 22 July 2026** (originally 21 July).

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<sup>1</sup> Where the last day of the filing period falls on a non-business day, such period shall be deemed to be extended to the next business day. In accordance with article 30 of Law 39/2015 of 1 October 2015 on the Common Administrative Procedure of the Public Administrations, Saturdays, Sundays and public holidays are non-business days.

[Directorate-General for Labour Resolution 17 of October 2025](#) (published in the Official State Gazette on 28/10/2025) lists the paid and non-recoverable national and regional public holidays

for 2026.

In addition, the [Resolution of 18 November 2025 of the State Secretariat for the Civil Service](#) (Official State Gazette of 18 November 2025) establishes, for the purposes of calculating the relevant periods, the non-business days applicable to the General State Administration and its public bodies in 2026. These are determined by reference to the official 2026 working calendar issued by the Directorate-General for Labour.

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