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*NEW ITALIAN RESIDENTS CAN BENEFIT OF TWO ALTERNATIVE TAX INCENTIVES:*

1

**TAX REGIME FOR HIGH NET WORTH INDIVIDUALS («RES NON-DOM»):**

Aimed at attracting HNWI as a reply to other European Countries also in response to Brexit



***THE TAX RELIEF IS ON THE FOREIGN (non-italian sourced) INCOME***

2

**TAX INCENTIVE FOR WORKERS («IMPATRIATES»):**

Aimed at attracting individuals with high working positions, also in response to the massive expatriation of skilled personnel from Italy



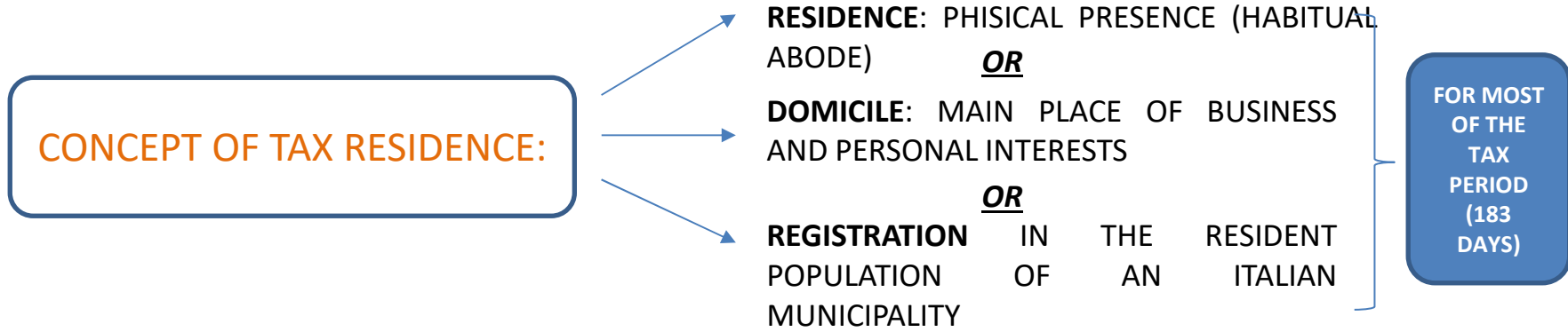
***THE TAX RELIEF IS ON THE ITALIAN INCOME***

TAX REGIME FOR HIGH NET WORTH INDIVIDUALS («RES NON-DOM»):



INDIVIDUALS (AND THEIR FAMILY MEMBERS) WHO:

- ➔ TRANSFER THEIR TAX RESIDENCE TO ITALY
- ➔ HAVE NOT BEEN RESIDENT IN ITALY FOR A PERIOD OF AT LEAST 9 OUT THE LAST 10 TAX YEARS



TAX REGIME FOR HIGH NET WORTH INDIVIDUALS («RES NON-DOM»):

WHAT IT  
COVERS

**ALL INCOME FROM NON-ITALIAN  
SOURCE**

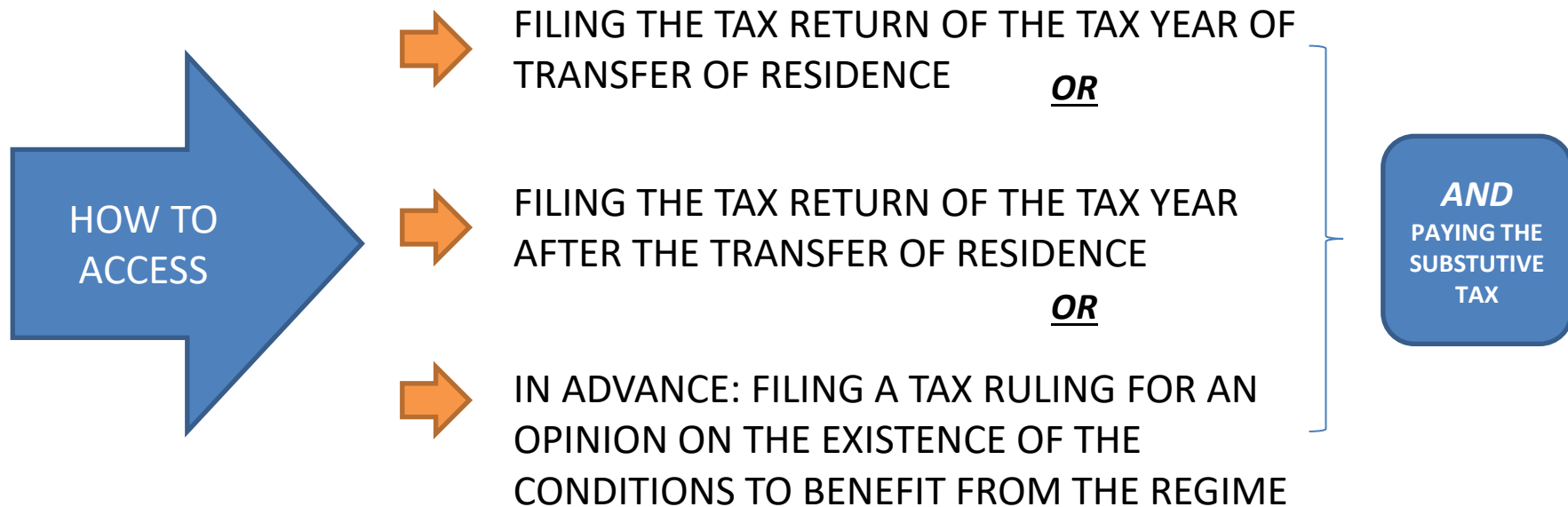
WHAT IT  
DOES NOT  
COVER

INCOME GENERATED IN ITALY (TAXED ACCORDING TO  
ORDINARY RULES)

CAPITAL GAINS FROM SALE OF QUALIFIED  
PARTICIPATIONS MADE DURING THE FIRST 5 YEARS  
(ANTI-AVOIDANCE RULE)

INCOME GENERATED IN SPECIFIC COUNTRIES BY  
CHOICE («CHERRY PICKING»)

TAX REGIME FOR HIGH NET WORTH INDIVIDUALS («RES NON-DOM»):



THE TAX RULING IS NOT NECESSARY TO ACCESS THE REGIME BUT GIVES ADDITIONAL CERTAINTY ON THE EXISTENCE OF THE CONDITIONS TO ACCESS

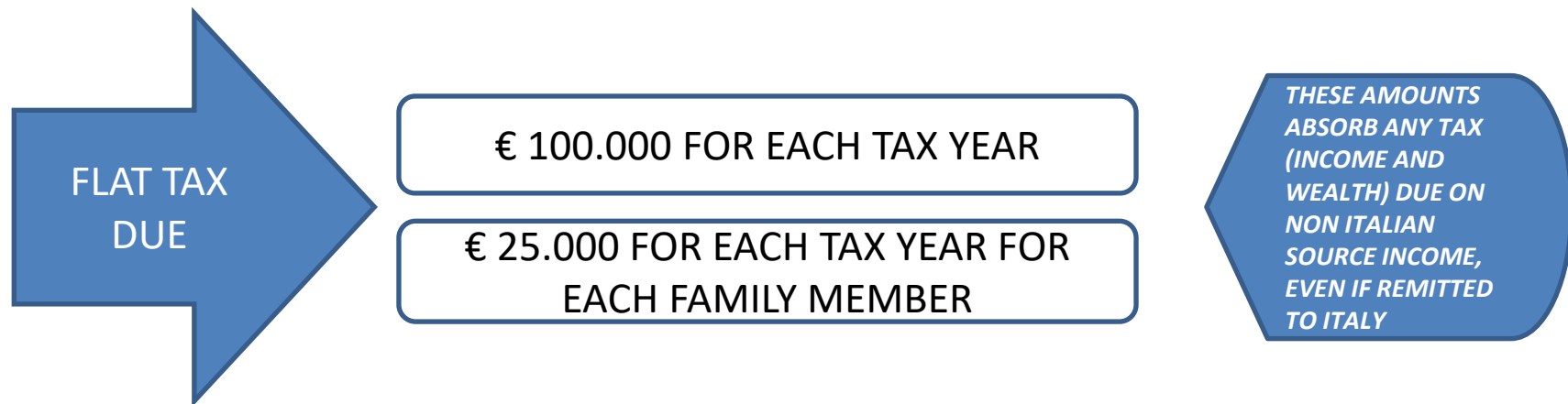
TAX REGIME FOR HIGH NET WORTH INDIVIDUALS («RES NON-DOM»):

EXTENSION  
TO FAMILY  
MEMBERS

CHOICE TO EXTEND TO FAMILY MEMBERS MUST BE MADE BY THE PRINCIPAL TAXPAYER IN THE TAX RETURN RELATING TO THE TAX PERIOD IN WHICH THE FAMILY MEMBER TOOK RESIDENCE IN ITALY OR IN THE TAX RETURN FOR THE FOLLOWING YEAR

SAME CONDITIONS TO ACCESS THE REGIME AS THE PRINCIPAL TAXPAYER (RESIDENCE OUT OF ITALY IN THE 9 OUT OF THE LAST 10 YEARS)

TAX REGIME FOR HIGH NET WORTH INDIVIDUALS («RES NON-DOM»):



**THE TAX DUE IS FLAT NO MATTER THE  
AMOUNT OF THE INCOME OF ANY  
NATURE HAVING NON ITALIAN SOURCE**

TAX REGIME FOR HIGH NET WORTH INDIVIDUALS («RES NON-DOM»):

DURATION  
OF THE  
REGIME

REGIME EXPIRES AFTER 15 YEARS

POSSIBILITY OF OPTING OUT ANY  
TIME BEFORE ITS EXPIRATION

FAMILY MEMBERS OPT OUT WHEN  
PRINCIPAL TAXPAYER IS OUT



TAX REGIME FOR HIGH NET WORTH INDIVIDUALS («RES NON-DOM»):

ADDITIONAL  
BENEFITS

FULL EXEMPTION FROM REPORTING REQUIREMENTS ON  
FOREIGN ASSETS AND INVESTMENTS IN TAX RETURNS

FULL EXEMPTION FROM WEALTH TAXES ON FOREIGN ASSETS  
AND INVESTMENTS

FULL EXEMPTION FROM INHERITANCE AND GIFT TAXES FOR  
ASSETS AND RIGHTS HELD OUT OF ITALY

*IN CASE OF TRANSFER BY INHERITANCE OF DONATION DURING THE PERIOD OF THE RES NON DOM REGIME, INHERITANCE AND GIFT TAXES WILL HAVE TO BE PAID IN ITALY ONLY FOR ASSETS AND RIGHTS HELD IN ITALY. THE EXEMPTION ALSO APPLIES TO THE FAMILY MEMBERS WHO JOINED THE SCHEME.*

TAX INCENTIVE FOR WORKERS («IMPATRIATES»):



INDIVIDUALS WHO:

- ➔ TRANSFER THEIR TAX RESIDENCE TO ITALY
- ➔ HAVE NOT BEEN RESIDENT IN ITALY **FOR THE LAST TWO YEARS**
- ➔ COMMIT TO REMAIN RESIDENT IN ITALY FOR AT LEAST TWO YEARS

CONCEPT OF TAX RESIDENCE:

- RESIDENCE: PHISICAL PRESENCE (HABITUAL ABODE) **OR**
- DOMICILE: MAIN PLACE OF BUSINESS AND PERSONAL INTERESTS **OR**
- REGISTRATION IN THE RESIDENT POPULATION OF AN ITALIAN MUNICIPALITY

FOR MOST OF THE TAX PERIOD (183 DAYS)

TAX INCENTIVE FOR WORKERS («IMPATRIATES»):

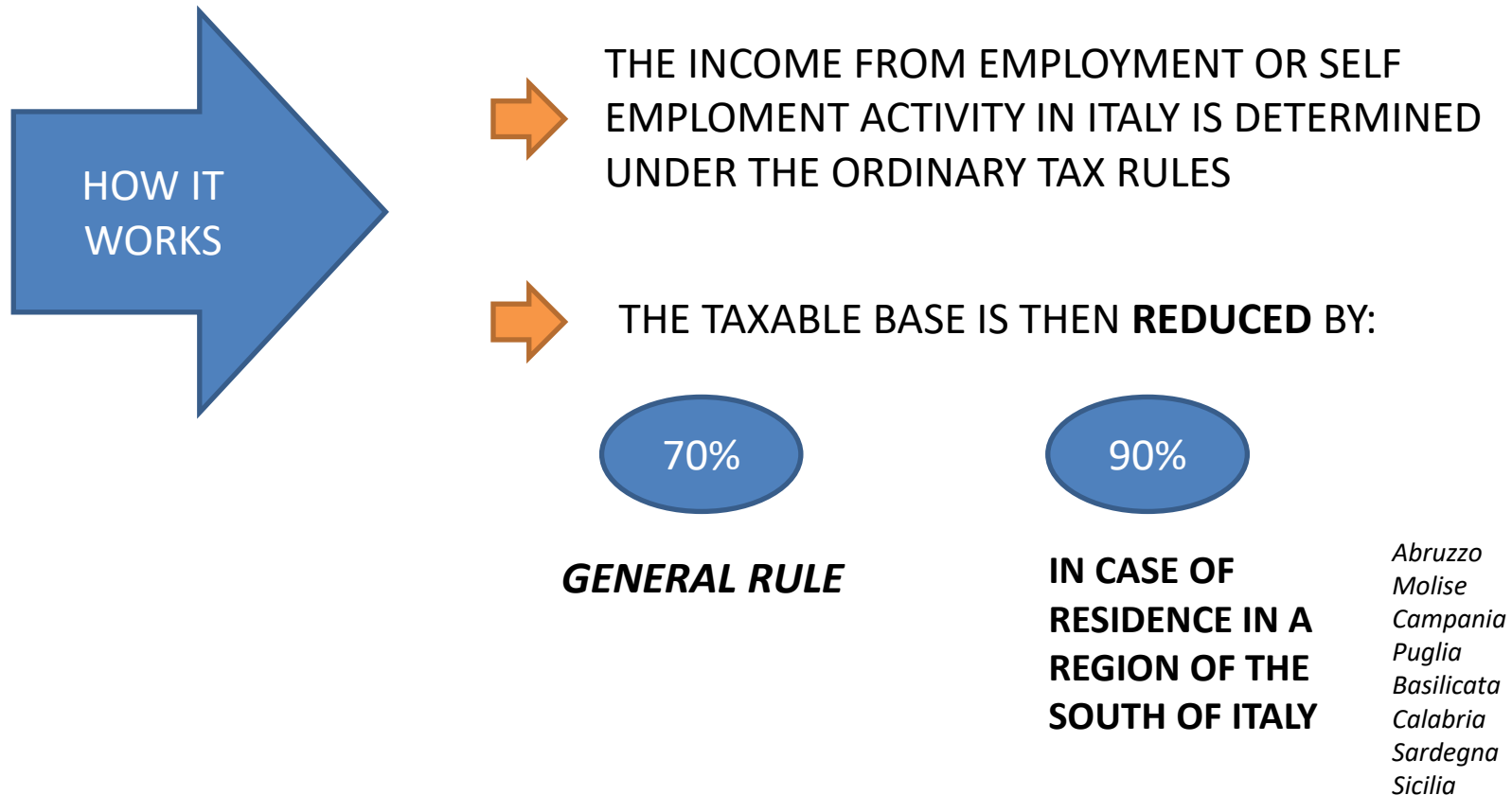
WHAT IT  
COVERS

**ALL INCOME FROM EMPLOYMENT OR SELF-  
EMPLOYMENT WORK IF THE WORK  
ACTIVITY IS PERFORMED MAINLY IN ITALY**

WHAT IT  
DOES NOT  
COVER

**ANY INCOME FROM NON ITALIAN SOURCE  
OR OTHER TYPE OF ITALIAN SOURCE  
INCOME (I.E. DIVIDENDS, CAPITAL GAINS,  
ETC)**

TAX INCENTIVE FOR WORKERS («IMPATRIATES»):



TAX INCENTIVE FOR WORKERS («IMPATRIATES»):

