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To the clients:

Subject: Launch of the “Rottamazione Quinquies” (Tax Amnesty Scheme No. 5)

The 2026 Budget Law introduces a new “tax truce” allowing the settlement of outstanding tax liabilities without penalties, with the option of instalment payments over a period of up to nine years**.**

In summary, under the “Rottamazione Quinquies”, it will be possible to settle **debts entrusted to the Collection Agency during the period from 1 January 2020 to 31 December 2023**, thus covering a time span of 24 years. Taxpayers who have been declared “in default” due to failure, insufficiency, or delay in the payment of one or more instalments under the previous “Rottamazione Quater” may also access the “Rottamazione Quinquies”. However, amounts due because of tax assessments are excluded, even if such amounts had been included in previous amnesty programmes. Payment notices that have already been included in the “Rottamazione Quater,” including those readmitted thereafter, for which payments are up to date as of 30 September 2025, shall not be eligible for inclusion in the “Rottamazione Quinquies.” Finally, **the “Rottamazione Quinquies” does not provide for the five-day grace period for payments**. The only tolerance allowed shall therefore be that related to calendar adjustments, in cases where the due date falls on a Saturday, Sunday, or public holiday.

1. **Periods Eligible for Settlement**

It will be possible to settle tax liabilities arising from **individual items** trusted to the tax collection agents between 1 January 2000 and 31 December 2023, deriving from: failure to pay taxes declared in the annual tax returns and activities referred to in Articles 36-bis (automated assessment of amounts due on the basis of tax returns filed) and 36-ter (amounts due following the formal review of tax returns) of Presidential Decree No. 600/1973 and Articles 54-bis (automated assessment of

VAT due based on returns filed) and 54-ter (automated controls on persons identified in Italy) of Presidential Decree No. 633/1972, or from failure to pay social security contributions due to INPS (National Social Security Institute), excluding those arising from formal tax assessments. Accordingly, particular attention should be paid to the date on which the debt was entrusted to the Collection Agent, which represents the deadline for eligibility under the present facilitated settlement procedure. The date of notification of the tax collection notice to the taxpayer is therefore irrelevant for the purposes of determining eligibility. Under this facilitated settlement, no interest or penalties shall be due, including late payment interest, additional penalties, and collection fees accrued. For administrative fines for road traffic violations imposed by State authorities, only interest amounts shall be subject to cancellation.

2. Payment Methods and Deadlines

The payment of the amounts due may be made either in a single instalment, **by 31 July 2026**, or **in up to 54 bi-monthly instalments**—that is, over a maximum period of **9 years**—of equal amount, according to the following schedule:

a) the first, second, and third instalments shall fall due, respectively, on 31 July 2026, 30 September 2026, and 30 November 2026;

b) the fourth through the fifty-first instalments shall fall due, respectively, on 31 January, 31 March, 31 May, 31 July, 30 September, and 30 November of each year, from 2027 through 2034;

c) the fifty-second, fifty-third, and fifty-fourth instalments shall fall due, respectively, on 31 January 2035, 31 March 2035, and 31 May 2035.

In the case of payment by instalments, interest at an annual rate of 4% shall accrue starting from 1 August 2026.

Payments due under the *Rottamazione Quinquies* may be made through one of the following methods:

a) by direct debit from the debtor’s current account, according to the procedures indicated in the communication sent by the Collection Agent;

b) by means of pre-filled payment forms, made available by the Collection Agent on its official website;
c) at the counters of the Collection Agent.

3. Deadlines for Applying to the *Rottamazione Quinquies*

The Revenue Collection Agency shall make available, within the restricted area of its official website, all relevant data required to identify the amounts eligible for inclusion in the *Rottamazione Quinquies*. Taxpayers may apply for the scheme no later than **30 April 2026**, by submitting a specific electronic d eclaration in which they must also indicate whether they intend to make payment in a single instalment or in instalments, up to a maximum of 54 bi-monthly instalments

4. Pending Tax Litigation

In the application for adherence, taxpayers shall declare the existence of any pending tax proceedings relating to the debts subject to the facilitated settlement and shall undertake to waive such proceedings. Upon submission of a copy of the adherence declaration and pending payment of the first or only instalment of the amounts due, the court **shall suspend** the relevant proceedings.

Since the facilitated settlement is deemed perfected only upon payment of the first or single instalment, the extinction of pending proceedings shall be declared ex officio by the court, upon submission—by the taxpayer, by the Revenue Collection Agency if a party to the proceedings, or in its absence by the creditor entity—of the adherence declaration, the communication that the Collection Agent must send to the taxpayers who submitted the declaration, by 30 June 2026; and documentation evidencing payment of the first or single instalment.

The termination of the proceedings entails the nullity of any judgments on the merits and of any orders or decisions issued during the proceedings that have not yet become final.

5. Calculation of the Amount Due

To determining the total amount payable, only the sums already paid as principal, included in the items entrusted for collection, and the amounts paid as reimbursement of expenses relating to

enforcement procedures and to the notification of the payment notice, shall be considered. If, because of previous partial payments, the taxpayer has already fully paid the amounts due,
he or she must nonetheless express the intention to adhere to the *Rottamazione Quinquies* to benefit from the effects of the facilitated settlement. This may apply, for instance, to taxpayers who forfeited their entitlement under the *Rottamazione Quater* due to late or missed payment of an instalment, but who have already fully settled the amount due, whether in a single payment or through instalments.

6. Benefits of the *Rottamazione Quinquies*

Following adherence to the *Rottamazione Quinquies*, the following legal and procedural effects shall apply: Limitation and forfeiture periods are suspended; Payment obligations arising from any previous instalment plans still in force at the date of submission are suspended until the due date of the first or single instalment payable under the facilitated settlement; No new administrative liens or mortgages may be registered, without prejudice to those already registered as of the date of submission; No new enforcement proceedings may be initiated; Previously initiated enforcement proceedings may not be continued, unless the first auction has already taken place with a positive outcome. The taxpayer shall not be deemed non-compliant for the purposes of voluntary offsetting of tax credits and the provisions governing payments by public administrations under Presidential Decree No. 602/1973; Finally, the Single Certificate of Social Security Compliance (*DURC*) may be issued upon submission by the debtor of the declaration expressing the intention to avail of the facilitated settlement procedure.

However, it cannot be ruled out that, following a review by the Revenue Collection Agency of taxpayers who failed to adhere to the *Rottamazione Quinquies* despite having debts recorded in the tax roll, the Collection Agent may proceed—including through aggressive collection measures—to recover such amounts. These actions may include attachment of bank accounts, garnishment of third-party receivables, such as professional fees or client receivables identified through electronic invoices, registration of mortgages over the debtor's real estate assets, and ultimately, petitioning the Court for the opening of judicial liquidation proceedings (formerly bankruptcy).

7. Minimum Instalment Amount

The amount of each instalment shall not be less than **euro 100**. By 30 June 2026, the Revenue Collection Agency , exclusively through the **restricted area of its institutional website**, shall inform taxpayers of: the amount of each instalment, and the corresponding due date for each payment.

8. Possibility of Reinstating or Requesting Additional Instalment Plans

Regarding the debts included in the *Rottamazione Quinquies* application, any previously suspended instalment plans shall be automatically revoked, and **no new instalment arrangements** may be granted in respect of the **same amounts**.

9. Circumstances in Which the *Rottamazione Quinquies* Produces No Effect

The *Rottamazione Quinquies* shall **produce no legal effect** in the event of **non-payment or insufficient payment** of:

a) the **single instalment** selected by the debtor to make payment;
b) **two instalments**, even if **non-consecutive**, if the debtor has opted for payment by instalments;
c) the final instalment if the debtor has opted for payment by instalments.

In such cases, the limitation and forfeiture periods for the recovery of the amounts subject to the settlement shall resume, and recovery proceedings shall continue under the responsibility of the Collection Agent. Any payments made shall be retained as partial payments towards the total amount due, without extinguishing the remaining debt.

10. Cases Involving Previous Amnesty Programmes (*Rottamazioni*) for the Same Debts

The following debts may be extinguished under the *Rottamazione Quinquies*:

a) debts relating to items entrusted to the Collection Agents between 2000 and 2017, which were the subject of declarations submitted under the first amnesty scheme, the Rottamazione-bis, the Rottamazione-ter, the reopening of the Rottamazione-ter, or the reopening of the deadlines for previous amnesty programmes;

b) debts relating to items entrusted to the Collection Agents between 1 January 2000 and 30 June 2022 for which, as of 30 September 2025, the previous definition has become ineffective, including those covered under the *Rottamazione Quater* and in cases of readmission to the *Rottamazione Quater*.

The following cannot be extinguished under the provisions of the *Rottamazione Quinquies*: debts resulting from items entrusted to the Collection Agents between 1 January 2000 and 30 June 2022, for which, as of 30 September 2025, all instalments due by that date have been fully paid, including those included in the *Rottamazione Quater* and any cases of readmission to that programme.

27 October 2025 Lawyer Dr. Angelo Pisciotte

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