## Year in review: transfer pricing in Italy

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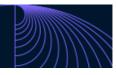
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Year in review

Recent updates to the law have introduced significant changes to deadlines for filing tax returns, which has impacted the time allowed for the preparation of transfer pricing documentation. Legislative Decree No. 108/2024 has increased the time permitted for filing income tax returns from nine months to 10 months following financial year end. Transfer pricing documentation must be submitted within the same time frame.<sup>8</sup>

Furthermore, Italian tax system was also subject to a deep review in respect to domestic regimes as well as cross border transactions and reorganisations, having no impact on transfer pricing best practices.

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