

31 March 2026

ON_10/2026

Dividend payments – reinstatement of the 1.2% reduced tax rate

To the attention of:	All Participants
Priority:	High
Topic:	Reinstatement of the 1.2% reduced tax rate

Dear Client,

On 27 March 2026, Decree-Law 38/2026 (Urgent provisions on tax and economic matters) was published in the *Official Gazette*, with the purpose of cancelling certain amendments introduced by the Budget Law and communicated by ES-MIL on 4 February 2026, with ON_03.

In particular, the Decree reinstates the conditions in force as of 31 December 2025 for obtaining the reduced 1.2% tax rate, pursuant to Article 27, paragraph 3-ter of Presidential Decree 600/1973, for Italian-source dividends received by corporations resident in the European Union.

Following Decree 38/2026, it will no longer be necessary to certify the additional requirements set out in the Budget Law, namely holding a shareholding equal to or greater than 5% and/or a fiscal value of the shareholding equal to or greater than EUR 500,000, in order to benefit from the reduced tax rate.

For further information, please contact:

eam@euronext.cm

This publication is for information purposes only and is not a recommendation to engage in investment activities. This publication is provided "as is" without representation or warranty of any kind. Whilst all reasonable care has been taken to ensure the accuracy of the content, Euronext does not guarantee its accuracy or completeness. Euronext will not be held liable for any loss or damages of any nature ensuing from using, trusting or acting on information provided. No information set out or referred to in this publication shall form the basis of any contract. The creation of rights and obligations in respect of financial products that are traded on the exchanges operated by Euronext's subsidiaries shall depend solely on the applicable rules of the market operator. All proprietary rights and interest in or connected with this publication shall vest in Euronext. No part of it may be redistributed or reproduced in any form without the prior written permission of Euronext.

Euronext refers to Euronext N.V. and its affiliates. Information regarding trademarks and intellectual property rights of Euronext is located at <https://www.euronext.com/terms-use>.

© 2022, Euronext N.V. - All rights reserved.