



CAMPIONE D'ITALIA

**TAX SITUATION AND OTHER
INTERESTING QUESTIONS**

2025

WHAT IS CAMPIONE D'ITALIA

Campione d'Italia is an Italian enclave located on the shores of Lake Lugano, completely surrounded by the Swiss territory of the Canton of Ticino. Although an integral part of Italy, Campione has historically had special economic and administrative relations with Switzerland. Today it is known for its breathtaking landscape, its unique history and its proximity to Lugano.



GENERAL ASPECTS

What specific tax advantages does Campione d'Italia offer compared to the rest of Italy?

- A tax advantage regime for resident individuals and professional and commercial activities operating in the territory.
- Tax advantage regulation for residents and operators of Campione d'Italia.
- Reduction of approximately 70% of the taxable amount determined on the basis of Italian legislation (Tuir - Consolidated Law on Income Taxes) and consequent payment of direct taxes in the amount of 50%.
- In essence, the maximum rate for individuals is around 16%, while for corporations it is around 10%.

GENERAL ASPECTS

How has the tax situation changed after the integration into the Italian tax system?

- There was no integration.

Are there any legislative changes underway that could affect investors and residents?

- There are no substantial changes at the moment.

PERSONAL TAXES

What are the effective income tax rates after the reliefs?

- In essence, the maximum rate for individuals is around 16%.

Is it worth moving to Campione for cross-border commuters working in Lugano?

- For new cross-border workers (employment relationship established after 17/7/2023) certainly yes, because they benefit from the Campione advantage regime. In fact, the Italian tax burden for the “new” cross-border worker from Campione will not be higher than that already applied in Switzerland.

PERSONAL TAXES

Is it worth it for Lugano residents to move to Campione?

- It depends on the individual's subjective and financial situations.

Are the tax breaks reserved only for residents of Campione d'Italia?

- Residents of Campione and natural persons registered with the AIRE of Campione who have income produced in Campione.

How are capital gains (shares, dividends, etc.) taxed?

- Generally, capital gains are subject to a 26% flat-rate substitute tax in Italy. For capital gains, the type must be verified.

PERSONAL TAXES

Are there any benefits for retirees or high net worth individuals?

- Campione also offers benefits to residents abroad who transfer their residence to Italy, allowing them a flat-rate regime in Italy, of the globalist type in Switzerland, with undoubted advantages in terms of costs compared to the current Swiss globalist regime (see page 14 for further details)

The total amount of the flat rate tax is 200,000 euros from the beginning of 2025. Each additional family member pays 25,000 euros.

CORPORATE TAXES

What is the effective corporate tax rate (IRES) considering

- The capital company for the income produced in Campione is subject to an overall tax rate of approximately 10%.

Are there differences in taxation between business sectors or company sizes?

- Excluding some specific sectors that are not applicable in Campione, commercial activities in Campione can benefit from tax reductions up to a tax benefit in the three-year period not exceeding €300,000, which corresponds to a tax exemption of taxable profit of approximately €1,760,000 overall in the three-year period.

CORPORATE TAXES

Are research and development expenses tax deductible?

- Yes, just like in Italy.

Are there any incentives for international companies that open a branch in Campione?

- Not specifically.

How are capital gains from the sale of businesses taxed?

- It depends on the person carrying out the operation.

REAL ESTATE TAXATION

What taxes apply to the purchase, ownership and sale of real estate?

- This is a fairly complex case, which derives from the type of person who carries out the operation and/or transfer.

Are there any restrictions for foreigners buying property in Campione d'Italia?

- Possible restrictions depend on the existing rules regarding “reciprocity” between Italy and the foreign country.

What is the situation for EU citizens?

- Free access and possibility of buying/selling.

REAL ESTATE TAXATION

For non-EU citizens, including Swiss citizens?

- The principle of reciprocity must be verified;
- For Switzerland, preliminary checks must be carried out and appropriate procedures must be adopted.

Are there any restrictions on the size of the property?

- In some cases (for example in Switzerland) there may be reciprocity issues.

Are there differences between private and commercial properties?

- Fiscally, yes.

REAL ESTATE TAXATION

Does Campione d'Italia apply municipal taxes on properties?

- Taxes on municipal services (Tari) and on real estate (IMU).

What is the VAT regime for real estate development projects?

- The territory of Campione is exempt from VAT, but subject to a local tax (ILCCI) which applies only to the final consumer and under certain conditions.

WEALTH TAXES AND INTERNATIONAL ASPECTS

Is there a wealth tax or similar contributions in Campione d'Italia?

- In Italy there is no property tax except IMU.
- There is a wealth tax on real estate and/or financial assets abroad.

How are international income and assets treated?

- The resident is obliged to report them annually with a specific form, paying a tax, except in some countries.

WEALTH TAXES AND INTERNATIONAL ASPECTS

Flat rate taxation in Campione d'Italia - what rules apply to individuals and their families?

- As previously noted, it is possible for a foreign resident to move to Italy with a simplified flat-rate tax regime (Italian globalist). The annual flat-rate tax can cover all income held abroad, without prejudice to the application of the relevant Double Tax Convention (where applicable). The total amount of the flat-rate tax is equal to 200,000 euros from the beginning of 2025. Each additional family member pays 25,000 euros.

Are there double taxation agreements with Switzerland and other EU countries?

- Yes, with the application of the relevant Convention.

PRACTICAL ASPECTS AND COMPLIANCE

What documents are required to access tax benefits?

- The registration in the registry office as a sample or the operational and concrete establishment in the territory.

What are the criteria to demonstrate tax residency in Campione?

- Registration in the registry office or assistance from a proven operational headquarters.

What are the main tax deadlines to be respected?

- Annual tax returns, balance sheet filings, etc. deadlines that may vary from year to year.

THE HEALTHCARE MODEL OF CAMPIONE D'ITALIA

How does it work?

- Can you use both Swiss and Italian healthcare infrastructure?
Yes, as long as you are an EU citizen.
- In Switzerland (Ticino) you pay up to 93 francs yourself and everything above this amount is covered by the health insurance company. If you are registered with mod S2 as a resident in Campione.

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