

29 February 2024

Europe

2024 Tax Compliance Virtual Symposium



About us

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PwC's Centre of Excellence on e-invoicing & e-reporting

- Mission: help companies, solution providers and public bodies across the world navigate the rapidly changing global landscape on e-invoicing and e-reporting
- PwC is the global lead advisor on e-invoicing & e-reporting
 - Global Network: + 152 countries
 - E-invoicing & e-reporting related assignments: + 120 countries
 - ITX experts: + 2.000 & technology experts: + 12.000



1

The road ahead:
a global update on
the latest regulatory
changes and timings



The e-invoicing & e-reporting landscape is changing fast in the EU and beyond

60+

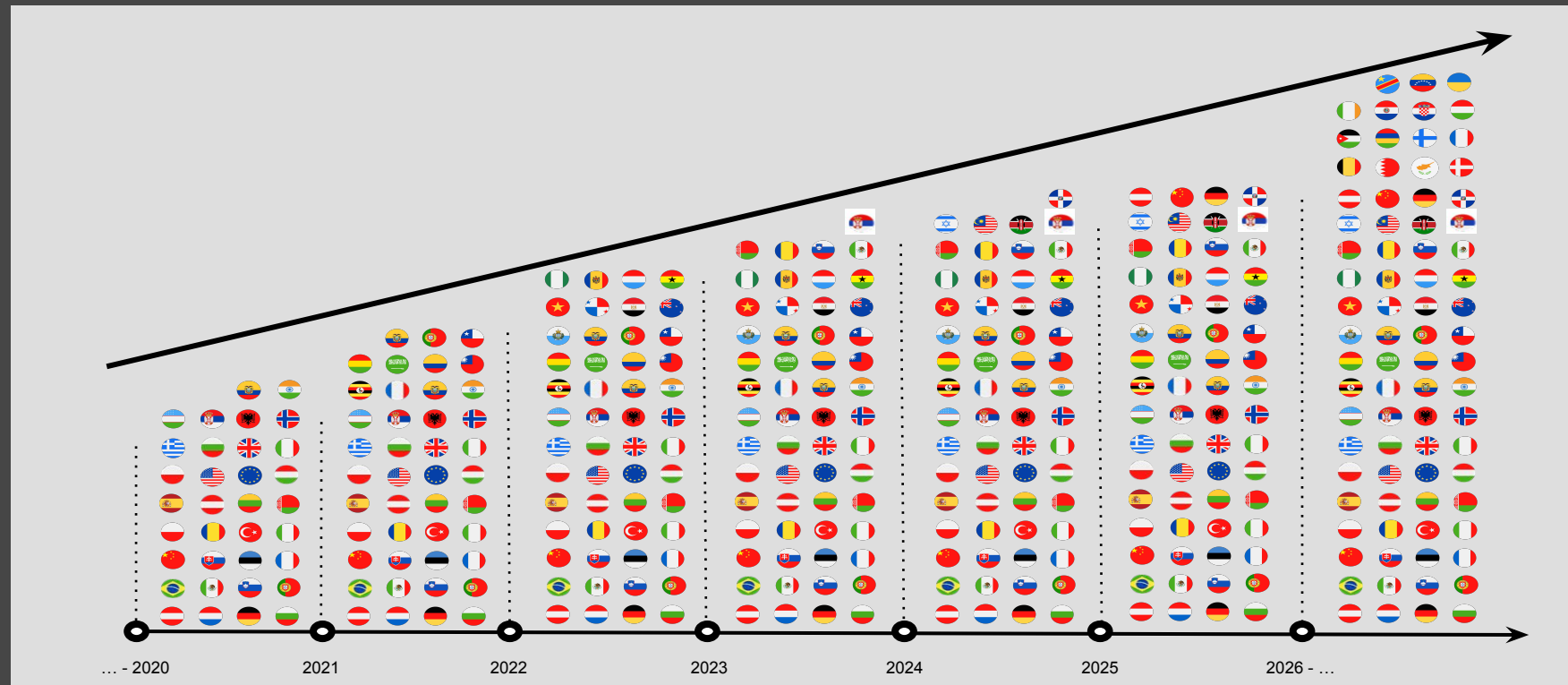
new obligation on the horizon

80+

countries impacted by obligations

70%

of businesses have no clear view on the obligations imposed/roadmap



E- requirements

#Mandatory e-invoicing obligations

Obligation to electronically exchange invoices/transactional data using a predefined format, sometimes via a government run platform.

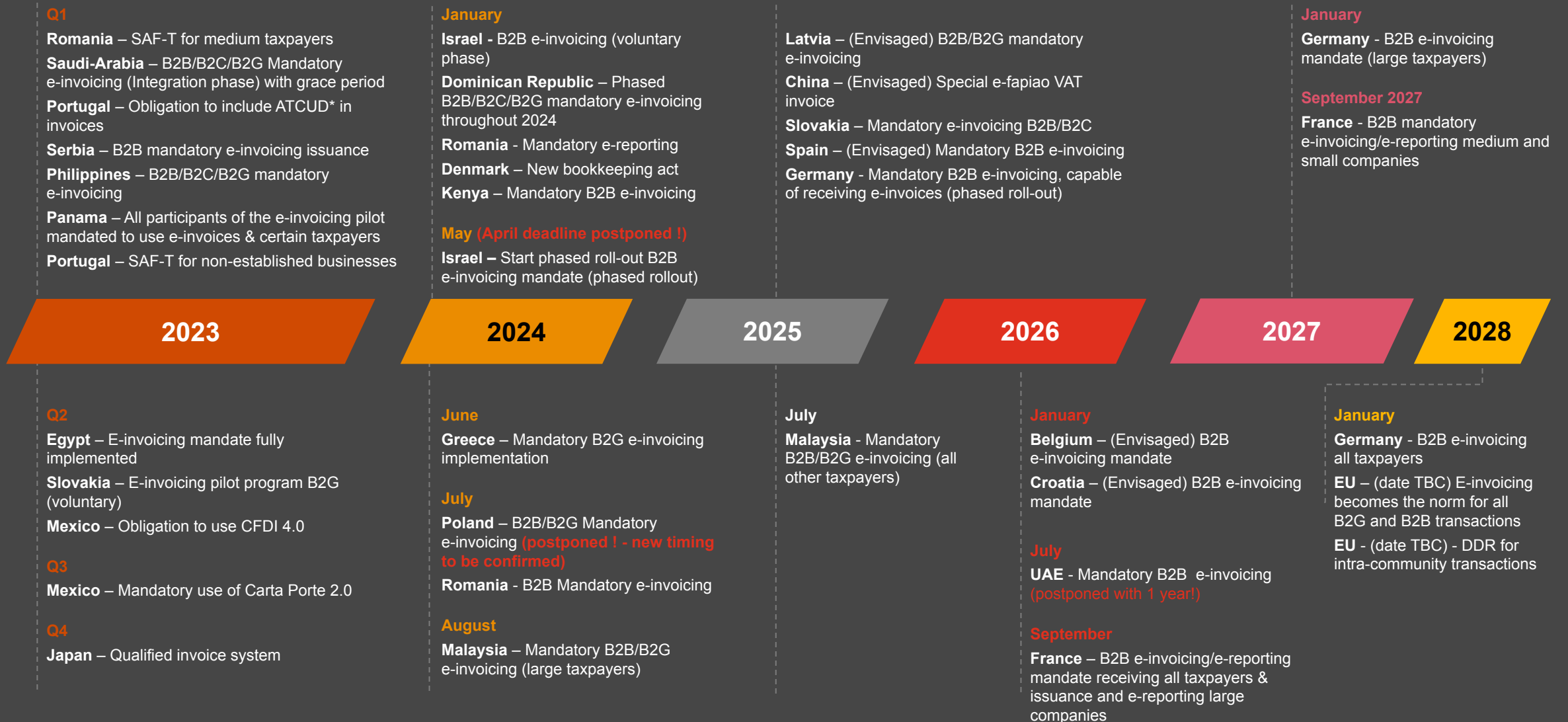
#Real-time reporting obligations

Requirement to communicate incoming and/or outgoing transactional data to the tax authority in (near) real-time, usually within a few working days, in a pre-defined format.

#On-request e-audit obligations

Obligation to be able to extract and present accounting/transactional data in a predefined format on request of the tax authority (eg. SAF-T).

EU and non-EU watchlist* - Future obligations



* This overview is purely indicative, non-exhaustive and subject to change. PwC – February 2024

2

VAT in the Digital Age (ViDA): an update on the latest state of affairs



The main drivers for the proposed changes in the ViDA proposal

Shortcomings of current situation



Fragmented regulatory framework



(Suboptimal) Fight against VAT fraud

Harmonize e-invoicing and e-reporting obligations to ensure an effective and fair VAT system, by fighting against VAT fraud, and especially intra-Community fraud.



! Limited to Pillar I: digital reporting requirements

Current status of the ViDA proposal

		Current framework	ViDA proposal (dec '22)	Proposed amendments
E-invoicing	Mandatory e-invoicing	Equal treatment paper & e-invoices, derogation needed for mandate	E-invoicing default option and mandatory for intra-EU transactions	Optional for domestic and intra-EU transactions?
	Format	Structured (e.g. XML, UBL) and unstructured (e.g. pdf)	Structured and use of EN 16391 standard should be allowed	Structured, use of EN 16391 standard questioned (wider variety of formats)
	Pre-clearance/distribution models	Allowed, if derogation obtained	Not allowed	Allow some validations / link with certified platforms
	Summary invoices	Allowed	Not allowed	Allowed
	Additional invoice content	N/A	IBAN and payment date	IBAN and payment date likely not included
E-reporting	What	Recapitulative statements	Digital reporting requirements	Digital reporting requirements
	Reporting frequency	Periodic (monthly, quarterly or yearly)	Near real-time (within 2 working days)	Longer timeline, up to 2 weeks
	Granularity	Aggregated data	Transactional data	Transactional data
	Timing	N/A	January 2028 (for DRR)	Delayed to 2030, potentially 2032

Next steps for the ViDA proposal

- **Discussions ongoing** within Committee of permanent representatives (Coreper II - Working Party on Tax Questions)
- The Belgian presidency is chairing the negotiations and reaching an agreement on ViDA is priority. It is rumoured that a **compromise text** was put forward by the Belgian presidency but its content is unknown
- An ECOFIN meeting is scheduled on **14 May 2024** where it is expected that ViDA will be one of the topics to be discussed by the EU ministers of Finance
- Keep in mind that **unanimous approval** by the Member States is required



3

Belgium:
a closer look at
the upcoming
B2B mandate



Background of Belgian B2B e-invoicing mandate

60+

E-invoicing & e-reporting obligations on the horizon

- Very strong global trend towards mandatory e-invoicing and e-reporting
- VAT in the Digital Age (ViDA) proposal at an EU level

2.5 billion

Estimated Belgian VAT gap in EURO in 2021

- Reduce VAT gap by increasing compliance and reducing errors
- Structured electronic invoicing as foundation for real-time reporting

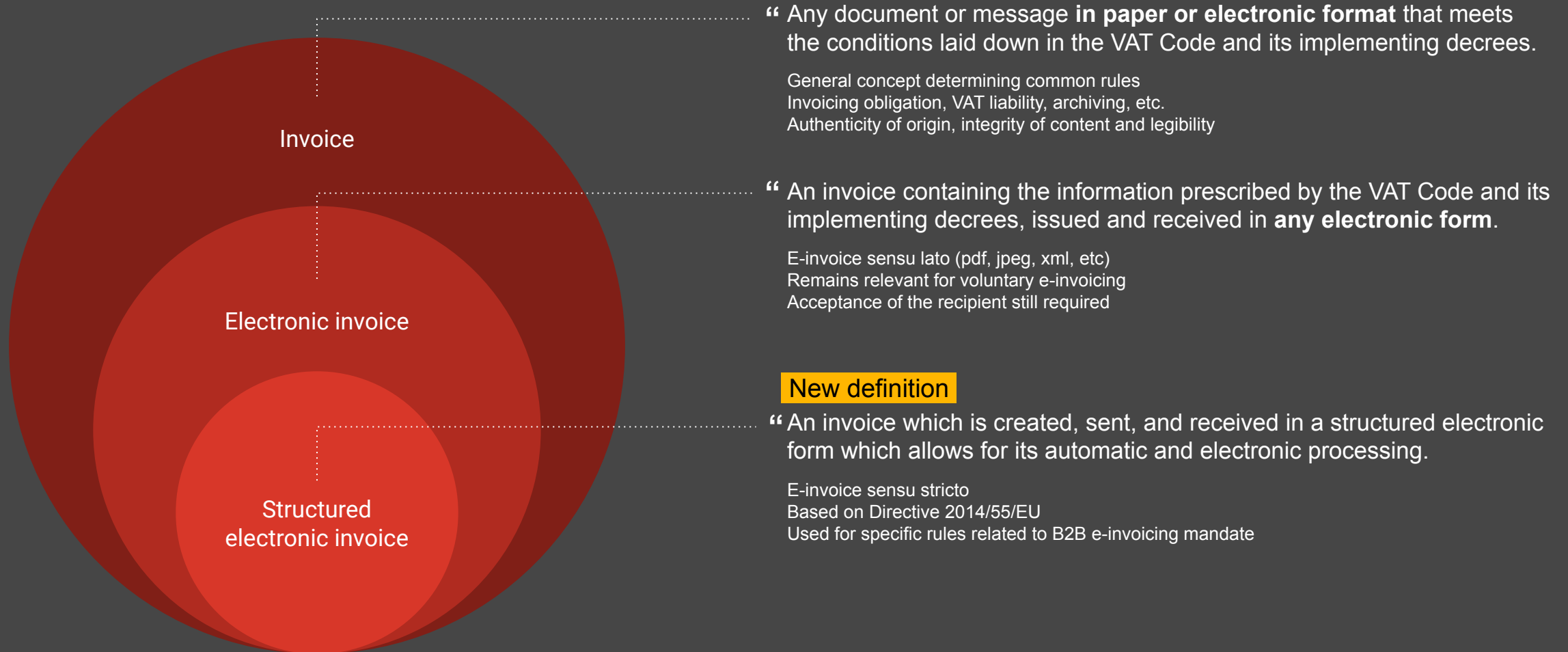
85%

Of invoices are still issued on paper or as a pdf

- Desire to increase digitalisation
- Automation via structured electronic invoicing can lead to greater efficiency and cost savings

A new concept is added to the regulatory framework

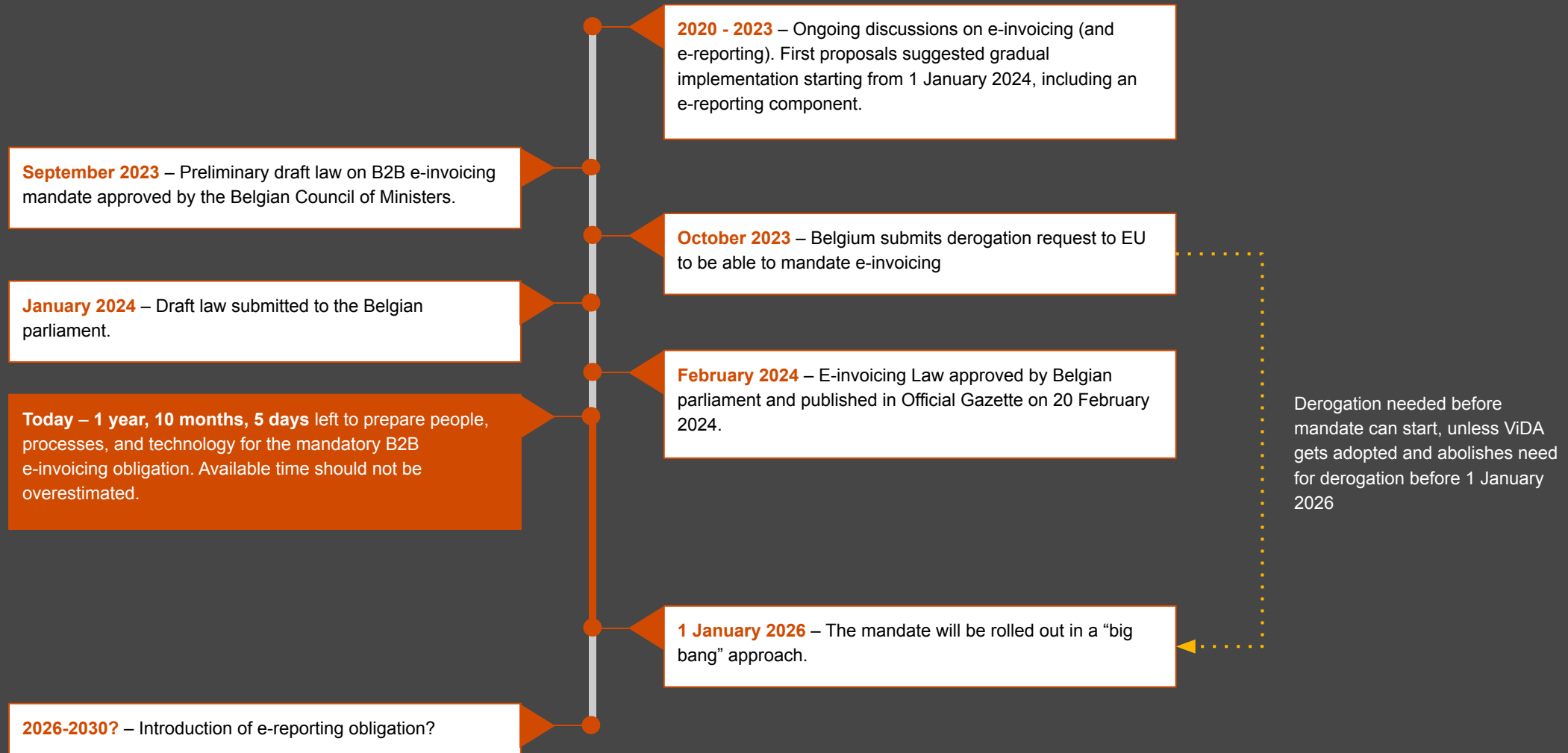
But the current rules will also remain



The upcoming Belgian B2B e-invoicing obligation in a nutshell

- ▶ As from **1 January 2026** the issuance and receipt of **structured electronic invoices** will be mandatory for certain B2B transactions ('big bang' roll-out)
- ▶ **Peppol** will become the default standard for exchanging structured electronic invoices, but some (limited) flexibility will be offered provided there is agreement between the parties
- ▶ The issuance of paper invoices, or invoices in other unstructured formats (e.g. pdf) will no longer be possible, for transactions in scope of the mandate
- ▶ Obligation applicable to invoices, but also to credit notes which need to be issued in the same format
- ▶ It is expected that the mandatory e-invoicing obligation will eventually be complemented by an e-reporting obligation (real-time data sharing with the tax authorities), but this is not in scope at this stage
- ▶ Specific Belgian **direct tax incentives** will be available in relation to the implementation of e-invoicing (conditions apply)

The journey so far and road ahead



The main impact on businesses

Operational



- ▶ Interruption of established business flows (operational readiness)
- ▶ Managing multiple solutions for transactions in/out scope and across jurisdictions

Compliance



- ▶ Increased scrutiny and accountability due to better audit possibilities
- ▶ Non-compliance penalties may be imposed & input VAT deduction could be at risk

Organization



- ▶ Many teams affected (tax function, finance, IT, etc.)
- ▶ Mindset change required as e-reporting is likely the next step



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Thank you!



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2024 Tax Compliance Virtual Symposium
29th February 2024



Peppol

The future is open

Peppol update

André Hoddevik
Secretary General, OpenPeppol
Special Advisor, Norwegian Agency for
Public and Financial Management

www.peppol.org

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About Peppol

OpenPeppol is who we are

We are a not-for-profit, democratic, member-led international association

OpenPeppol was established in 2012 as a follow-up to the EU-funded eInvoicing large-scale pilot that began in 2008

Our members come from the public and private sectors, with membership continuously increasing as new members join from all around the world

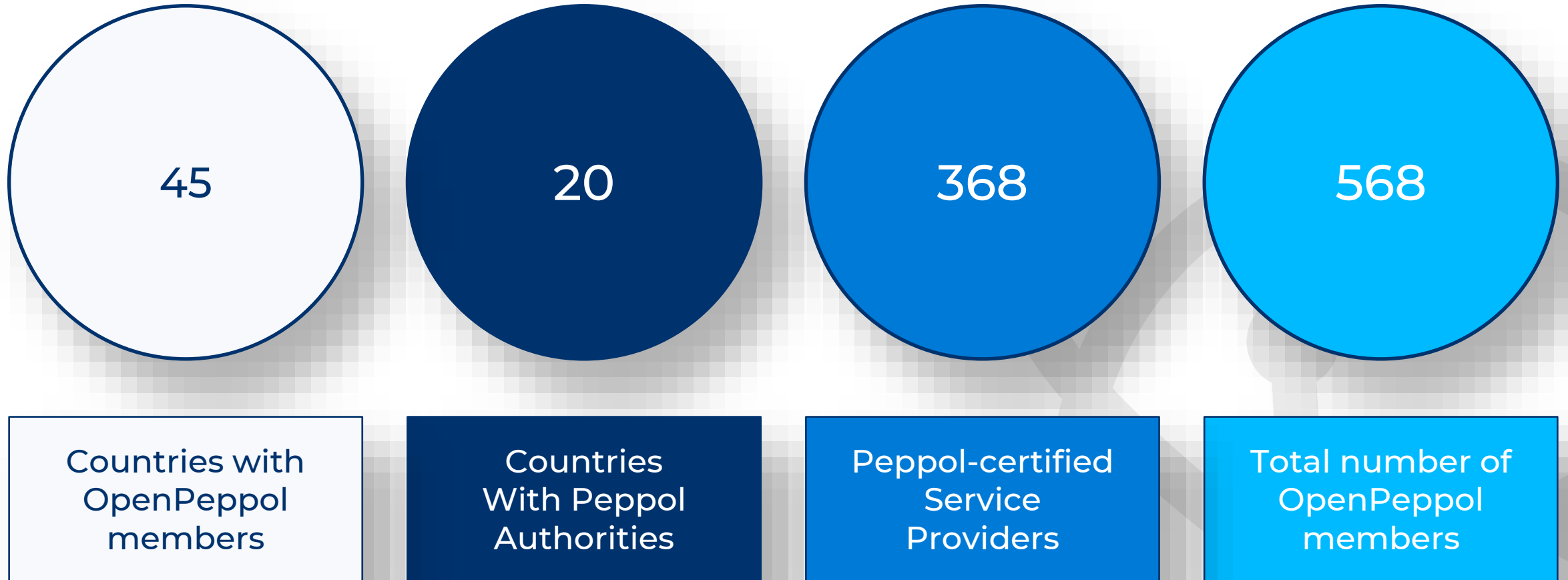
Peppol is what we do

We improve business efficiency between organisations by standardising the way information is structured and exchanged

Peppol is the name of the Network and Message Specifications that we provide, and includes legal agreements, governance and compliance

Peppol services are delivered by Peppol-certified Service Providers
Peppol does not directly provide services to buyers and sellers

Peppol global statistics



What is needed for interoperability?

Governance

Network

Specifications

The Peppol Interoperability Framework, meets these needs through

**Legal agreements,
policies, and procedures
between stakeholders**

Defines the rules under
which Peppol activity is
undertaken

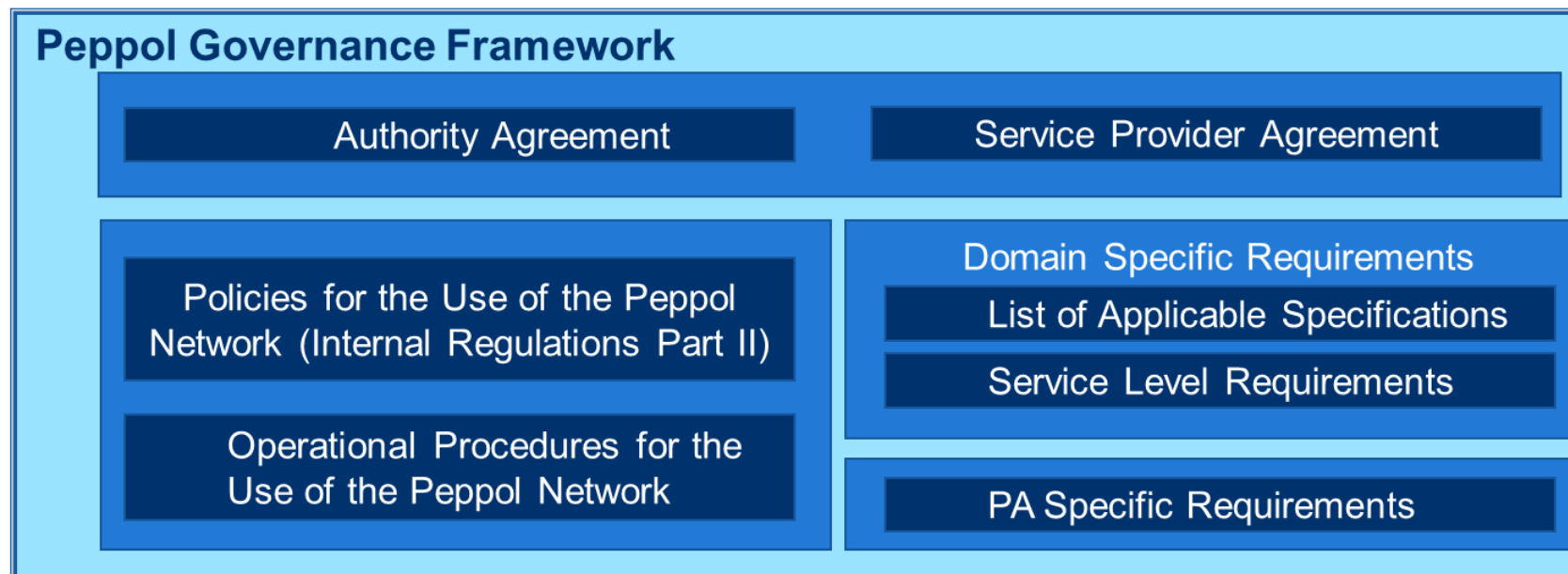
**Network architecture
with a four-corner
model**

Enables Peppol-certified
Service Providers to
send and receive
Peppol documents

**Peppol Business
Interoperability
Specifications**

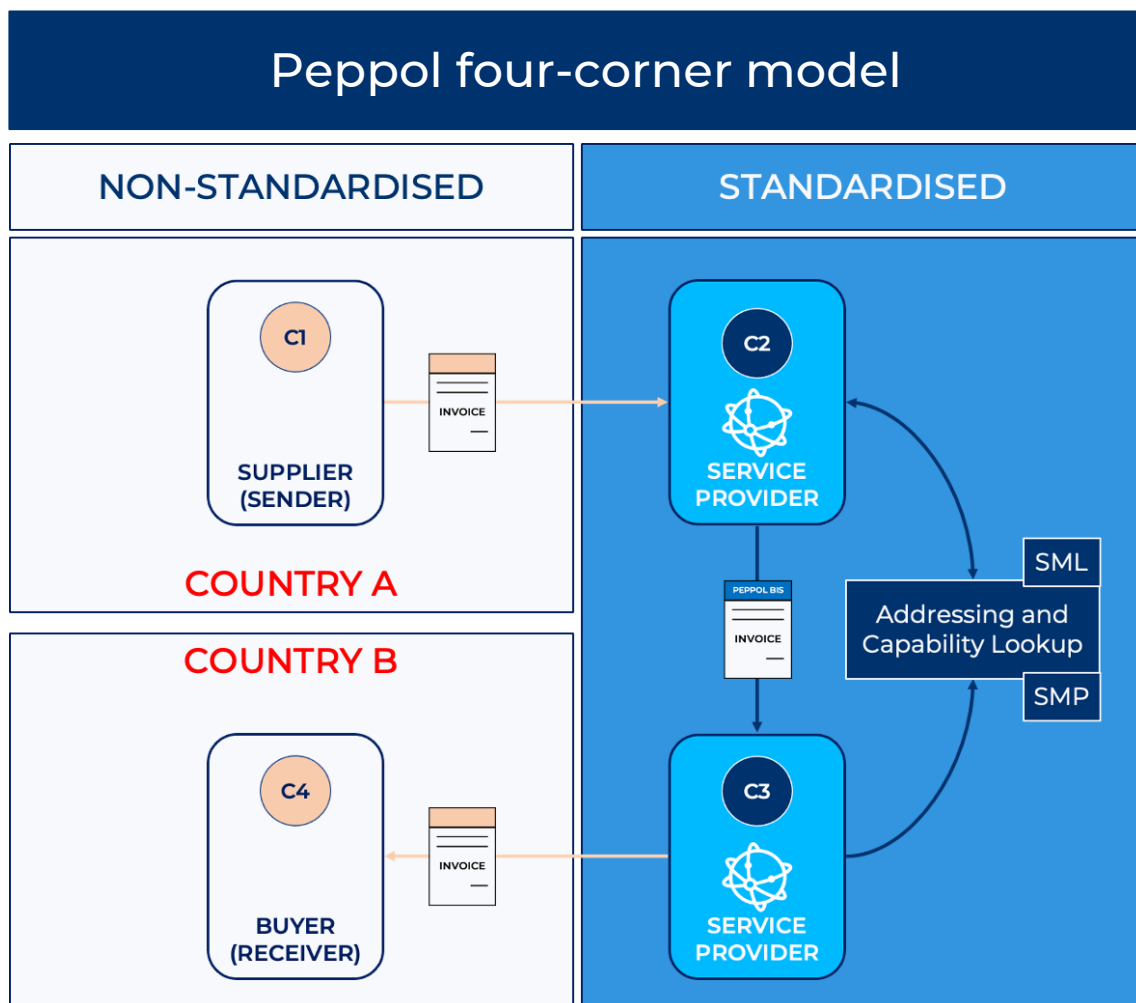
Process flow, document
content and format
exchanged between
Service Providers

Governance



- Agreements that enables **many-to-many interoperability** without bilateral arrangements
- **Policies** that give guidance to change management, service provider accreditation, information security, extended use of the Peppol Network and more
- **Operational procedures** to handle the day-to-day use of the policies, including change management, issue reporting, non-compliance management and more

Networks



A collaborative approach

- While Peppol service providers compete, they cooperate within OpenPeppol to develop specifications
- On the network level, OpenPeppol is collaborating with other networks to promote global interoperability and the four-corner model:
 - Global Interoperability Forum (GIF)
 - GENA(formerly EESPA)
 - OFS Portal
 - DBN Alliance

Specifications

SHARED

Business driven

Key content:

- trading parties
- total amounts
- items and prices

ALIGNED

Legally driven

Key content:

- tax information

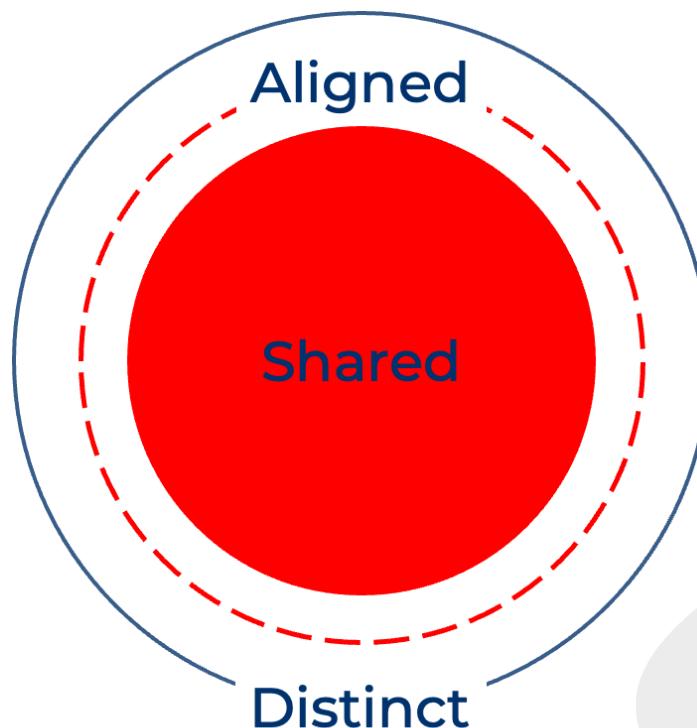
DISTINCT

Jurisdiction driven

Example content:

- organisational identifiers

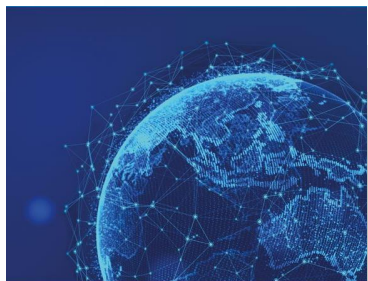
PINT METHODOLOGY



Invoice data model

- Each jurisdiction will have its own PINT specification, enabling both domestic and cross-border exchange
- About 80% of invoice content is common across jurisdictions
- About 15% of invoice content can be aligned between jurisdictions
- About 5% of invoice content is unique to a jurisdiction

Achieving global interoperability

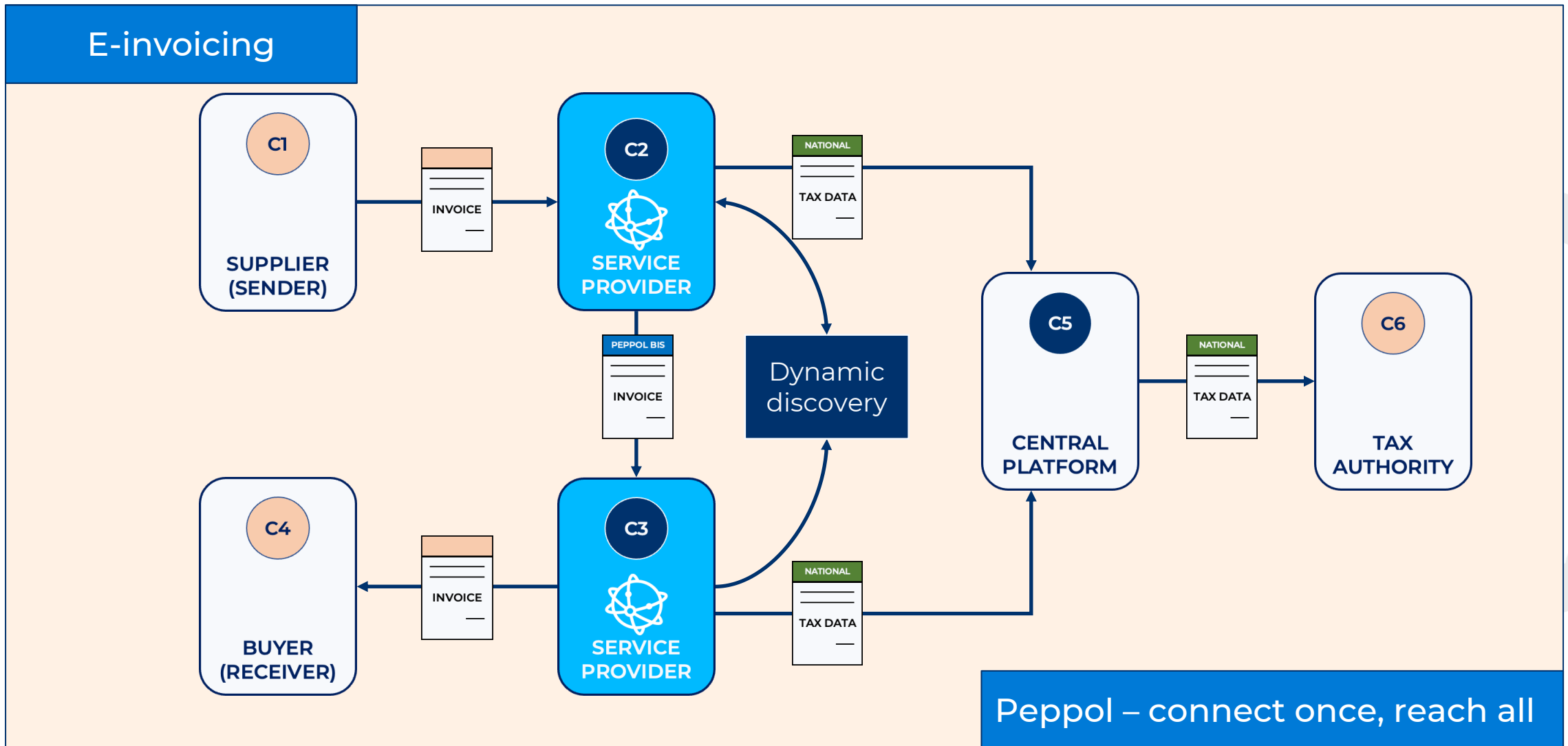


The Peppol International Invoice (PINT) methodology enables global interoperability for business document exchange

- PINT is an e-invoice specification and an update to the Peppol Network, that enables cross-border interoperability
- Japan has launched e-invoicing using PINT
- Singapore, Australia and New Zealand will introduce PINT in the coming months
- Malaysia will introduce e-invoicing using PINT
- PINT provides a solution for European countries when trading outside Europe



Peppol for e-invoicing and Digital Reporting



France Proof of Concept – Approach

1. Joint GENA/OpenPeppol project with active involvement from the French National e-invoicing Forum (FNFE)
2. Objectives;
 - Apply digital reporting in the Decentralised CTC and Exchange (DCTCE) model to the Y model of the French reform
 - Implement a DCTCE-based Proof of Concept in France;
 - Demonstrating that French specification files and format can be transferred using Peppol Network (Regulated Flow)
 - Demonstrating that Senders outside Fr jurisdiction can send standard Peppol format files successfully to French Taxpayers in the standard Peppol Interoperations manner (Non-Regulated Flows)
 - Initially based on a 4-corner model
3. Currently 61 Service Providers (SPs) are participating in the PoC
 - Still welcoming new members
 - 15 countries represented;
 - France (37), Belgium (4), Sweden (2), Spain (2), Germany (3), Italy (2), USA (2), Netherlands(2), Finland, Switzerland, Denmark, Portugal, UK, Poland, India

France Reform Timetable

1. Amendment to the 2024 Finance Bill, 49.3 Finalised
 - Obligation to receive For ALL by September 1, 2026 + 3 months
 - Obligation to issue + e-reporting for large businesses on 1 September 2026 + 3 months
 - Obligation to issue + e-reporting for SMEs on 1 September 2027 + 3 months
 - Other dates, to be announced in Q1 2024 PPF (and Annuaire (French Directory) available: at best end of 2024 in test Pilot: during 2025 + 2026,
2. Consequence, in practice, obligations are postponed by 24+ months The Annuaire will be available until sometime in 2025 (and initially only for pilots) The market cannot go "Standby" for 2 years...

France Proof of Concept – Current Progress

1. France PoC has been successful in exchanging file formats between the test participants
2. Following the extended delay to the formal reform implementation dates the intention now is to deliver a Minimum Viable Product which would have the following advantages;
 - Minimum risk
 - Minimum disruption
 - Minimum cost
3. This would also allow earlier deployment and be;
 - Adaptable
 - Scalable
4. A major objective will be to ensure that focus is maintained on the final solution so that no unnecessary work or investment is carried out by the Service Providers or by OpenPeppol
5. There has been increased cooperation with the responsible French Government Departments, now meeting on a regular basis to finalise the formal technical specifications and ensure that InterOperations discussion is maintained
6. The «Annuaire» (French Directory) may now be available earlier for testing and operational use on a voluntary basis

France Proof of Concept – Next Steps

1. Possibility of the Annuaire being available earlier has now led to a revised phased approach;
 - Phase 1 – MVP Pilot – Without French Annuaire fully operational, regulated and non-regulated flows
 - Phase 2 – Production without French Annuaire fully operational, regulated and non-regulated flows
 - Phase 3 – Production with French Annuaire fully operational and connected to Peppol France,
 - Phase 4 – after September 2026 : it continues.
2. The precise timings for these Phases has yet to be confirmed but it is hoped to commence Phase 1 (MVP Pilot) in Q2 2024
3. In parallel, work on the Peppol Authority France is actively continuing and being readily discussed by French Government Departments and which Department/Organisation could initially pick up this role
4. Following the FNFE annual e-invoicing Conference on Thursday 7 March in Paris there will be a meeting with all the participants the following morning

Why Peppol?

The **Peppol framework** enables interoperability and efficiency
B2G and B2B

Peppol Digital Reporting (CTC) is a flexible approach,
meeting the varying needs of tax administrations

The **Peppol International Invoice** enables cross-border and cross-continental interoperability

Peppol
Connect once – reach all



Thank you!

More information
info@peppol.eu
www.peppol.org



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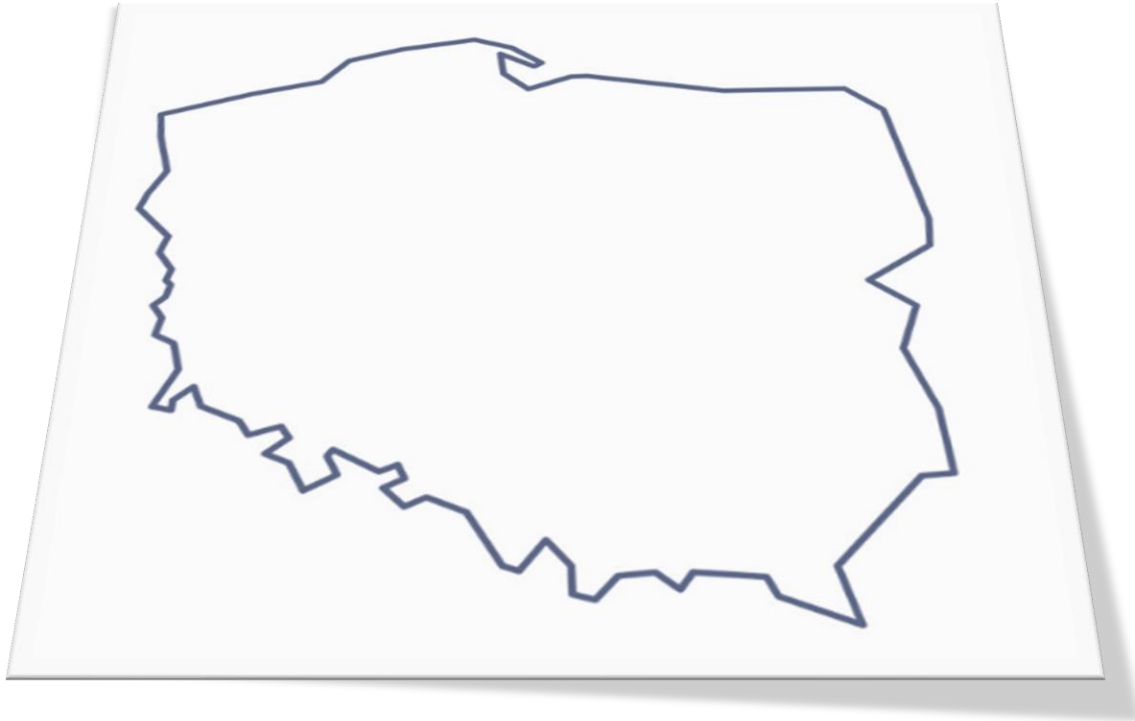
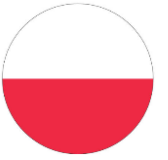


A serene sunset scene over a calm sea. A path of smooth, dark, rounded stones leads from the foreground towards the horizon, where a bright sun is setting. The sky is a mix of orange and blue, and the water reflects the colors. The stones are arranged in a slightly curved line, creating a sense of a long, winding path.

KSeF: Polish e-Invoicing system

An overlook on very long road to e-invoicing

Poland characteristics



Ca. 1,2 billion invoices a month issued in Poland

1,5 million of taxpayers

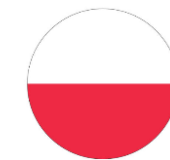
Ca. 30% electronic invoices (EDI)

100% taxpayers report VAT electronically

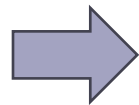
Standard Audit File for Tax obligatory since 2018

VAT gap at the level of 3,3% of potential VAT income (EUR 1,7 billion)

A roadmap for Poland



Obligatory e-invoicing deadlines announced by the Ministry of Finance



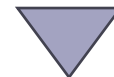
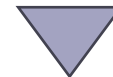
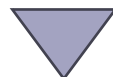
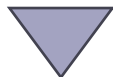
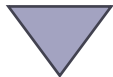
01.2023

04.2023

01.2024

07.2024

01.2025 ??



11.2021 First rules upon voluntary e-invoicing introduced

12.2022 Amendments to the existing rules proposed and opened consultations with business

04-08.2023 New rules adopted

01.2024 - New consultations announced and deadline postponed

01.2025 - The new start date?

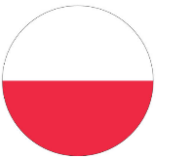
03.2022 derogation received from the EU

02.2023 Over 200 parties file their remarks to the proposed e-invoicing rules

12.2023 - New government in Poland

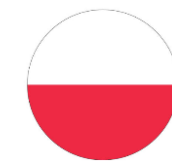
06.2024 - A full set of new regulations promised

Polish e-invoicing system: derogation rules



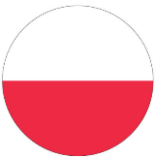
- ✓ Introduction of mandatory e-invoicing allowed from April 1st 2023 at the earliest
- ✓ Timing of derogation decision: 04.2023 – 03.2026
- ✓ Key features:
 - ✓ Exclusion for foreign taxpayers with no permanent establishment (for VAT) in Poland
 - ✓ Sales and international purchase transactions in scope (including intra EU purchase transactions) -> *Poland resigned from this part in the target model*
 - ✓ Polish e-invoicing system validates invoices
 - ✓ Online and offline procedures for invoice issuance (once the system is down)

Polish e-invoicing system: key features



- ✓ Polish e-Invoicing System (KSeF) - as for now **POSTPONED**
- ✓ **All sales invoices (except B2C invoices)** are to be sent to the Ministry of Finance in a structured (XML) format Again under discussion currently
- ✓ No big-bang - VAT exempt taxpayers in the 2nd phase Again under discussion currently
- ✓ **„KSeF is to be the invoicing system”** (it defines an invoice issue date) Again under discussion currently
- ✓ The taxpayer must send data for invoice issuance in **real time** (or at least the same day, the invoice date is quoted in the data sent)
- ✓ **No attachments** allowed in KSeF (pure XML schema)
- ✓ KSeF allows for downloading all **domestic purchase invoices** issued for the taxpayer TAX ID (in structured XML format)
- ✓ The system requires **identification** of the person / company uploading data / downloading invoices
- ✓ **Dedicated, standardized XML data format** means much more information (over 400 fields), but also has limitations. Again under discussion currently

Polish e-invoicing system: impact



- ✓ High **cost of implementation** for large companies
- ✓ High **impact on processes** (sales, accounting, legal, data exchange)
- ✓ High risk of **double information flow** - e-Invoicing + business information flow still in place (EDI solutions will be still maintained)
- ✓ A number of **additional legal requirements** related to implementation of e-invoicing, like:
 - ✓ **Changes to transactions on cash registers** (resigning from simplified invoice as a fiscal receipt with tax id)
 - ✓ **Payments** must be marked with KSeF ID (assigned by KSeF)
 - ✓ **SAF-T for VAT** structure (JPK_VAT) requires KSeF ID to be populated
 - ✓ **New SAF-T structure for CIT** (JPK_CIT) requires KSeF ID to be populated

Would like to learn
more? Please do
contact us!



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2024 Tax Compliance Virtual Symposium

A graphic of the European Union flag, featuring a blue field with twelve gold stars arranged in a circle. The flag is positioned on the right side of the slide, partially overlapping a dark blue triangular shape that points towards the top right. The background of the slide is a light blue map of Europe with several white stars scattered across it.

RTC Suite

Speakers

Meet the Experts: Voices Behind the Evolution



Moderator:
Johannes von Mulert
Founder & Chairman,
e-Invoicing Exchange Summit



Ellen Cortvriend
Partner,
PwC Belgium



André Hoddevik
Secretary General, OpenPeppol
Special Advisor, Norwegian Agency for
Public and Financial Management (DFØ)



Marcin Madej
Tax Advisor,
ITtax, Poland



Ridvan Yigit
Founder & CEO,
RTC

Agenda

2024 Tax Compliance Virtual Symposium



01

Part 1: Global and European Focus (2.00-2.40 pm CET)

- > Overview of Global e-Invoicing Landscape
- > France and Belgium: Regulatory Updates and Compliance Strategies

02

Part 2: Country-Specific Insights (2.45 - 3.30 pm CET)

- > Poland: Navigating e-Invoicing Requirements
- > Romania: Achievements and Challenges in Tax Compliance

03

Q&A Session (3.30 - 4.00 pm CET)

RTC Suite
Designed for

Clearance



Timeline of Romanian e-Compliance



SAF-T Report

3 types of declarations:

D-406 Declaration: Tax and accounting report on a monthly basis

D-406 Asset: Yearly asset declaration report.

D-406 Stock: Stock information declaration on-request by ANAF.

January 2022: Mandatory for large taxpayers

January 2023: Mandatory for medium taxpayers.

2025: Small taxpayers

- Required file format: XML (UBL 2.1)



e-Transport

Ministry of Finance introduced the RO e-Transport electronic system to monitor the transportation of high-tax-risk goods only in Romania starting from **July 2022**.

- Alcohol
- Fruits & vegetables
- Clothing & footwear
- Construction materials
- Mineral products

Domestic, exports, imports, intracommunity transactions are included

RO e-Transport system is reachable via SPV

- Required file format: XML (UBL 2.1)

As of 1 January 2024, the international transport of goods is also subject to the RO e-Transport regulations. As of 1 July, sanctions will be applied to all transports of goods. Grace period between January – June 2024.



e-Invoicing

The very first introduction of B2B & B2G invoicing was completed back in **September 2021**.

Gradually, the scope was extended to B2B invoicing for all taxpayers from **July 2022**.

Decision (EU) 2023/1553 of **25 July 2023** authorising Romania to introduce mandatory e-invoicing for B2B transactions between taxable persons established in Romania

Recently, a draft law is published by Ministry of Finance, referring to B2B invoicing obligation for all taxable people, resident and non-resident taxpayers from **January 2024**.

- Required file format: XML (UBL 2.1)

Legal & Regulation

Key Facts

- ▲ **January 2024 | Timeline for e-Invoicing**
 B2B and B2G invoices should be reported and sent via RO e-Factura System for all taxpayers

- ▲ **Required Format**
 XML (UBL 2.1) compliant with EN 16931

- ▲ **Digital Signature**
 Not mandatory. **e-Seal** will be valid. When an invoice is submitted ANAF will e-Seal the document after validation

- ▲ **July 2024 | Timeline for e-Transport**
 Sanctions will be applied as of July 1

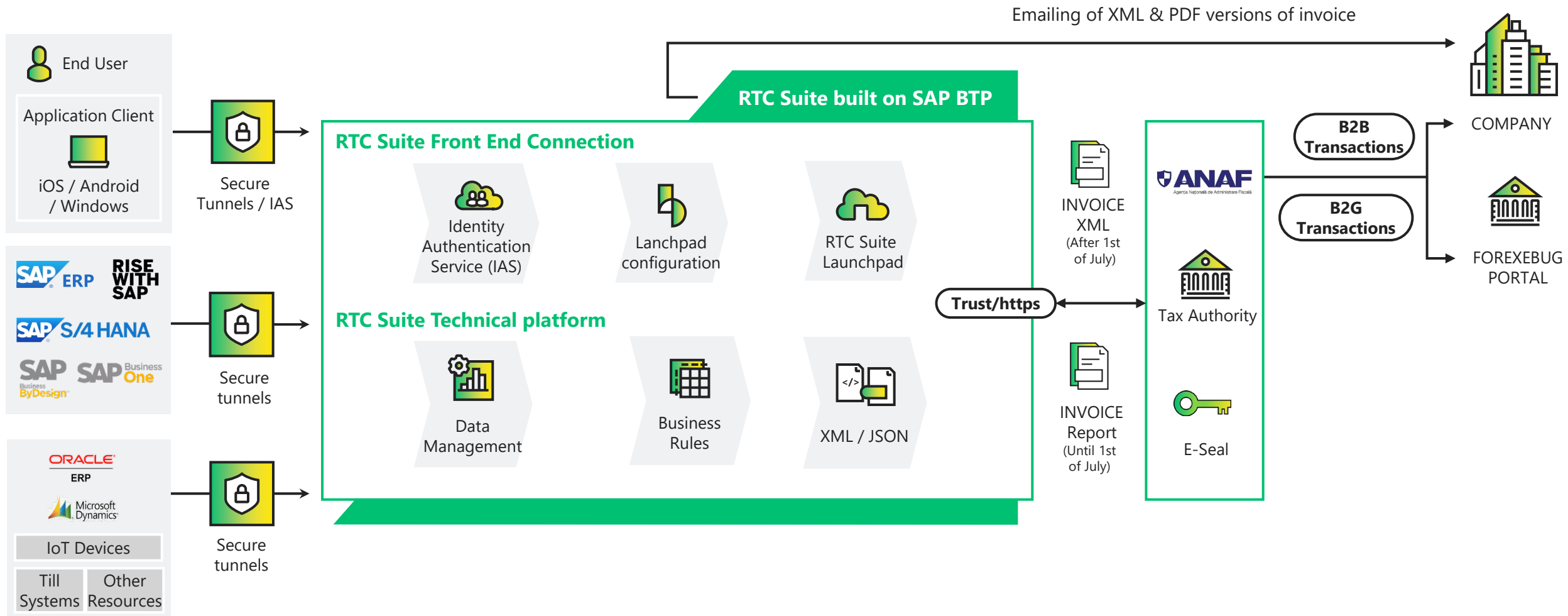
- ▲ **2023 & 2025 | Timeline for SAF-T**
 - Jan. 23: Mandatory for medium taxpayers.
 - 2025: Small taxpayers



Business Preparation & Implementation



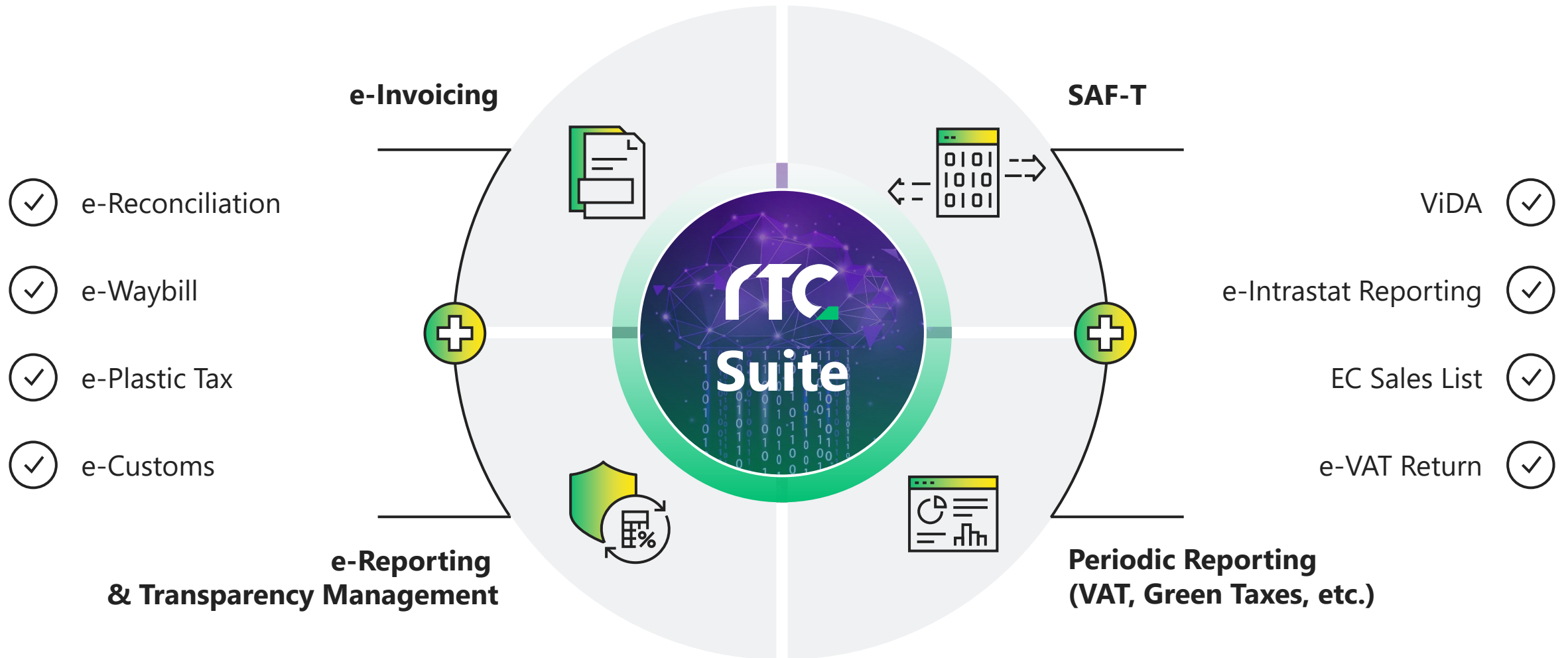
RTC – Romania e-Factura Solution



RTC Suite – Our Cloud-Based Software Platform



Automated creation, transmission and tracking of compliance documents and reports

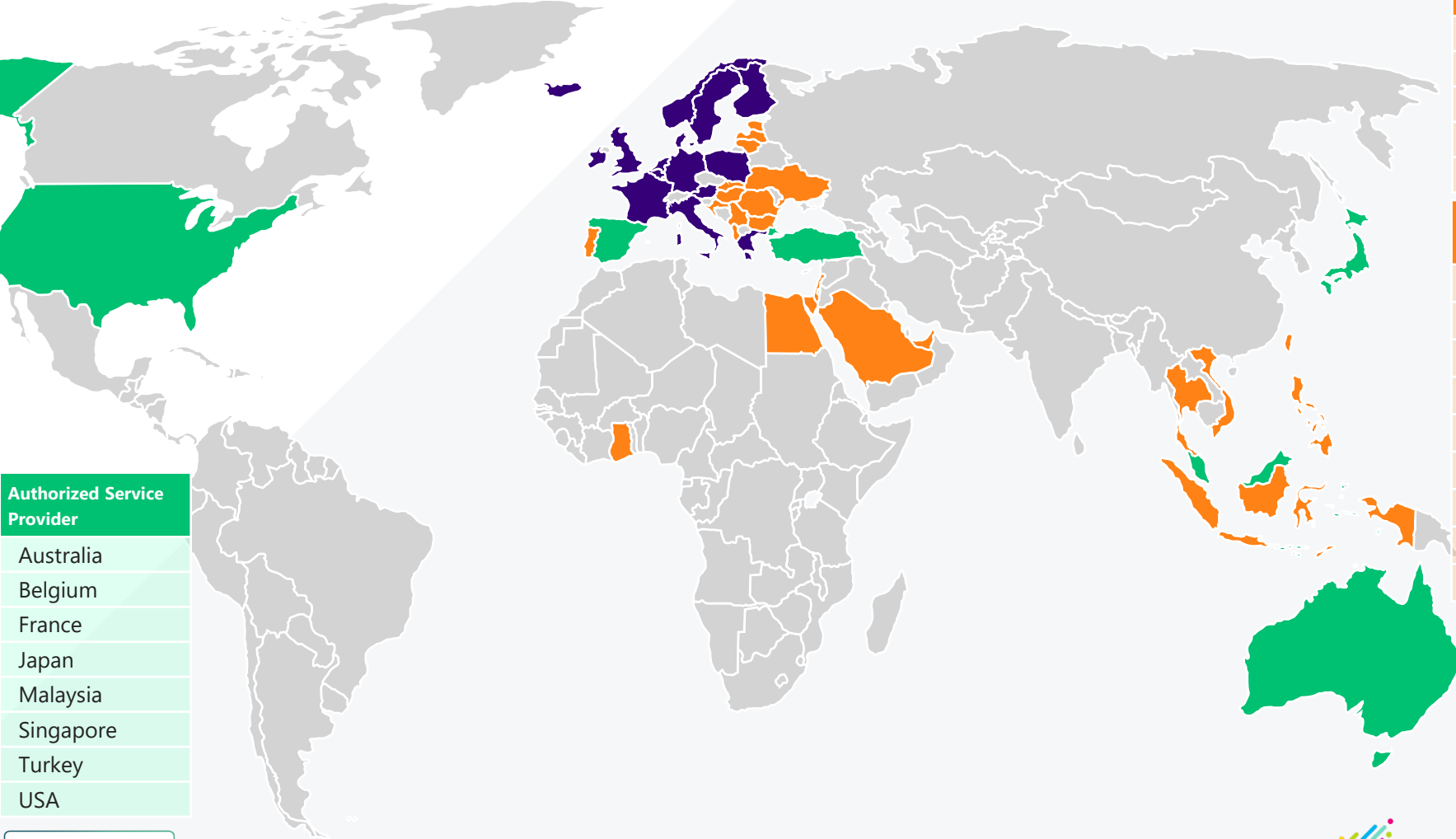


Official Service Provider

The Global Interoperability Framework



Peppol
Australia
Austria
Belgium
Denmark
Finland
France
Germany
Greece
Iceland
Ireland
Italy
Japan
Netherlands
New Zealand
Norway
Poland
Singapore
Sweden
United Kingdom



Authorized Service Provider
Australia
Belgium
France
Japan
Malaysia
Singapore
Turkey
USA

Service Provider (MEA)	Service Provider (EU)
Egypt	Albania
Ghana	Austria
Israel	Belgium
Saudi Arabia	Bulgaria
UAE	Croatia
	Denmark
Service Provider (APAC)	Estonia
Australia	Finland
Indonesia	France
Malaysia	Germany
New Zealand	Greece
Philippines	Hungary
Singapore	Iceland
Taiwan	Italy
Thailand	Latvia
Vietnam	Lithuania
	Luxembourg
	Norway
	Poland
	Portugal
	Romania
	Serbia
	Slovakia
	Spain
	Sweden
	Ukraine

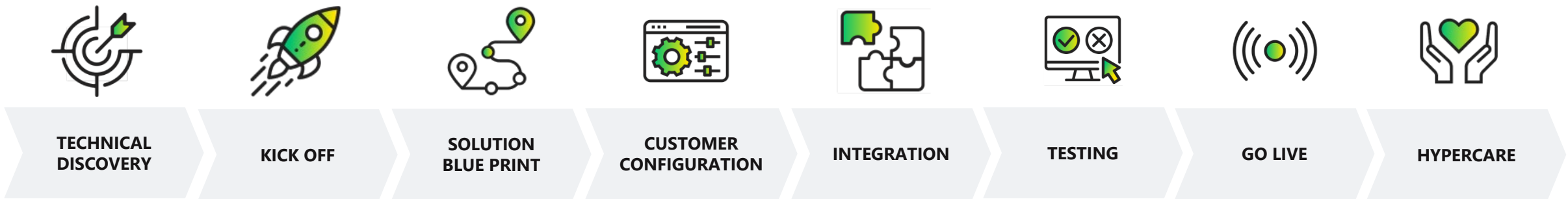


Reduced Project Implementation with new Regulations

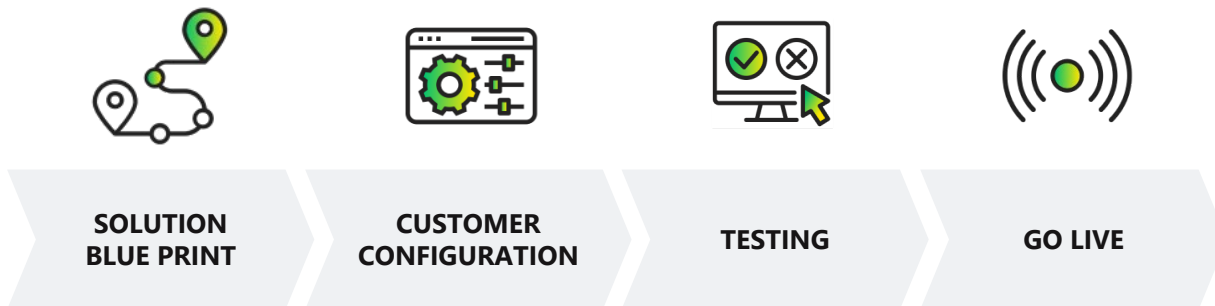


A Smart platform for end-to-end e-Invoicing

RTC Suite offers a smooth and the easiest implementation process for **Initial Country**



Additional Countries and Solutions will be even easier and faster:



Q&A

Thank you!



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