

E-invoicing and VIDA Directive

Lessons learnt

Considerations for MNE operating internationally

SWISSHOLDING Meeting

40 minutes, 28 slides

Felix Hassine



Plan of this presentation

Introduction

Considerations:

- 1- The phases of e-invoicing introduction
- 2- Overview of regulation and changes
- 3- Behind the regulation: taxman gets superpowers
- 4- Impact on organization – AR side
- 5- Operations (the “VIKAS” position)
- 6- E-invoicing AP side (where applicable)
- 7- Technical challenges
- 8- An example: our model at KN
- 9- Inspections from e-invoicing data

E-invoicing

Introduction

- E-invoicing exists for long, but took a new turn as of 2020. The new form is the “Peppol” form.
- The new “Peppol e-invoicing” provides all transactional data from taxpayer to tax authorities (TA), every day
- TA builds a database for each taxpayer, then builds business intelligence across transaction
- E-invoicing is a start of a new era where TA has more data, more analysis, and more intelligence than the taxpayer
- **Purpose of this presentation:** the perspective of the taxpayer, to understand the new tax transformation incoming

Introduction

Where it already happened

2018: IN

2021: IT, AL

2023: CL, PE

2024: EC, RO, RS, IL, ID, MY

Consideration 1:

The phases of e-invoicing introduction

- **Step 1: ask selected taxpayers to send the data, electronically, daily – AR only**
- **Step 2 (1 -3 years): progressively enlarge the obligations to any taxpayers and any invoice**
 - Threshold by turnover, by invoice amount, by B2G/B2B/B2C
- **Step 3: Introduce a binding tax portal, AR only**
- **Step 4: Introduce a non-binding AP portal (domestic suppliers)**
- **Step 5: Portal becomes binding, AR and AP**
 - the burden of proof reverses, obligations to declare all unwanted invoices under N-days
- **Step 6: Prefill VAT returns**
- **Step 7: Prefill the WHT**
- **Step 8: reconcile the CIT**
- We have witnessed this scenario in IN, CL, SA, IL, RO, RS, etc...
- The frog gets boiled, when portal arrives it is too late.



Consideration 2

Overview of regulation and changes

- DRR: Digital Reporting Requirement
 - Ask businesses to record transactional data in pre-determined format
 - At EU level and domestic level

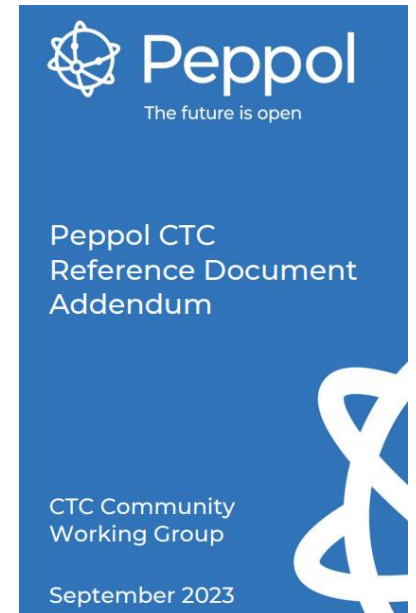
 Our focus

B2C deemed supplier

Introduce OSS for B2C and IOSS (Import One Stop Shop)

DRR

- The DRR is in reality the transposition into EN of the Peppol Network requirements, which many non-EU countries started already
- EN 16931 is the implementation of Peppol principles to EU with EU centrally coordinated “add-ons”
- As a consequence: **you should view EU and non-EU as a continuity**



Consideration 3

Behind the regulation: taxman gets superpowers

Like the frog, it was announced and hard to believe...



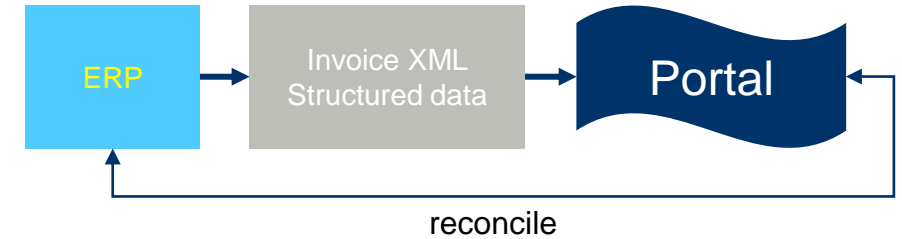
As a consequence: if you want to know the future, look at countries where the system is in place at an advanced stage

| | Access to taxpayer data | Tax return preparation | Audit selection | Audit process | Sanctions/damage |
|-------------|---|--|---|---|---|
| Stage one | Tax return and other disclosures | Taxpayer | Risk assessment and prioritising mainly manually by tax inspectors, sometimes rule-based algorithm | Manual sample testing of data by inspectors (often on-site) | Tax due + penalties for wrong tax return Reputation |
| Stage two | Disclosures and wide-ranging mandatory reporting obligations | Taxpayer | Risk assessment by machine learning algorithm, prioritising by inspectors focusing on outliers | Sample testing by algorithm, manual sample testing by inspectors (often on-site) | As above, adding personal liability |
| Stage three | Vast own data collection capabilities independent of taxpayer | Taxpayer | Risk assessment, prioritising and selection by algorithm, supervised by inspectors, real-time auditing of everyone for some tax types like VAT (no selection anymore) | Extended sample testing by algorithm, sample testing by algorithm with directly extracted data (remote or on-site), rare, selected manual testing by inspectors on site | As above, including extended personal liability, and risk of data loss/ mismanagement by the authorities (including hacking of authorities' database) |
| Stage four | Extensive information exchange: including data from other tax types, other jurisdictions (automated) 'Network analytics effects' | Taxpayer | Risk assessment, prioritising and selection by algorithm, only partially controlled by tax inspectors; real-time tax auditing by algorithm for more tax types | Testing based on huge cross-function data collections by algorithm ('automated auditing'), mainly remote, rarely on-site (fraud) | As above, adding risk of inappropriate data quality, unproven data integrity |
| Stage five | Access to all data required to determine tax (direct data extraction; fully integrated platforms) | Authorities (automated taxation) | No selection necessary anymore, real-time tax auditing by algorithm with more information for all taxpayers and all tax types | Shift towards IT and process audit | As above, adding risk of inappropriate internal tax processes and risk of hacking of direct data flows to authorities |
| Stage six | Including data from other public sector departments | Authorities (automated taxation, automated payment?) | Real-time auditing by algorithm with more information | IT and process audit | As above |

☐ Traditional methods ☐ Disruptive methods

Source: PwC book 2018: "What happens when the taxman gets superpowers"

Impact on organization – Accounts Receivable (AR) side



- The invoice is no longer the paper / PDF document you send. The invoice is the e-invoice
- The PDF **will still exist** → “Commercial document”
- Each taxpayer manages 2 concurrent flows:
 - **The commercial flow: it exists when it is generated, sent and received**
 - **The e-invoicing flow: it exists once gets acknowledged by the “IRN”**
- Since decades companies have the commercial flow – ONLY.
- Now the commercial flow is superseded by e-invoice flow
- What if...?:
 - **Commercial exists, e-invoice does not exist?**
 - **E-invoice exists, commercial does not exist?**
 - **How do you link both?**
- **Consequences**
 - Taxpayers’ books are no longer primary. Portal books are.
 - Taxpayers shall reconcile at least monthly
 - Reconciliation goes way further than VAT

[illegible]

Consideration 4:

Impact on organization – AR side - Continued

Whose job is to reconcile?

- Items transmitted: do you have the reference (Invoice Reference Number or “IRN”) in your books?
- Items missing in Tax Authority Portal (TAP): procedure?
- Items blocked in the middle: who’s in charge?
- What is the data transmitted used for?
 - VAT
 - CIT
 - WHT
- Without IRN, can the customer pay?
- On cutoff dates, what happens?

Consequence:

- Reconciliation in AR is an obligation. If you don’t, VAT return will differ
- If data differs → Your VAT return will differ from TAP data
 - Choose TAP: issue with auditors
 - Choose ERP: Issue with tax authorities
- News: the probability data will be exactly similar in both ERP and TAP is near zero.

Consideration 5

Operations (the “VIKAS” position)

- Operations is the day-to-day resolution of issues
- The person in charge of arranging the data is an operator
- **Job description:** repair errors of today + repeat tomorrow.
- Experience regarding job profile
 - very high attrition. Longest tenure: 2 years (Vikas).
 - In most countries, **NOBODY wants this job!**
 - In most countries, position has no backup (reason: cost + candidates availability)
 - Despite position, high rate of errors unsolved

Issues?

- Master data missing
- Master data incorrect
- Downtime TAP
- Downtime of your provider
- Data error in interface
- Etc...

Consequence:

- **Operating the interface is an issue post-implementation**
- **If you don't operate daily, reconciling is mission impossible.**
- **If you do, additional HC + high attrition + effectiveness challenge**
- **The only possibility we have found: Centralize, automate, AND create an organizational link to interfacing team**

Consideration 6

e-invoicing Accounts Payable (AP) side (where applicable)

Your company is the customer of registered companies → You get e-invoicing AP from the tax portal

- But a concurrent process exist since years to process the “Commercial Document”
- Which is the primary document? Commercial or E-invoice AP?
 - If you pay a commercial document, without the e-invoice AP → You cannot deduct
 - If you pay an e-invoice without commercial document → You may miss the references of payment (PO number, File number, delivery number,..)
- Advice: Put fiscal requirements central: The invoice is the e-invoice
 - Unless for strategic supplier, e-invoice is the primary invoice
 - Reject “first come first served” approach

6- AP velocity Explained



Day -2

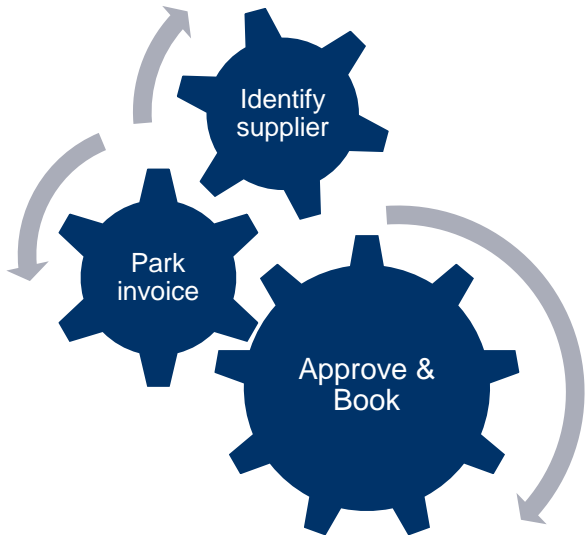
ERP



1hr

Day 1

Commercial flow



Day +15

Taxable amount -10,000
VAT -2000 EUR

Traditional flow of AP invoices

TAP

| | | | | |
|--|------------|---|----|-------|
| d96811d-a355-4aa6-9c3e-0096202bc187_1.zip | successful | 0 | 20 | 6 Mar |
| 29d779d1-6081-4377-a83a-b009485d298_1.zip | successful | 0 | 20 | 6 Mar |
| 07108d23-a370-416a-8f53-f96d28287831_1.zip | successful | 0 | 20 | 6 Mar |
| b345725c-d87c-43f9-b365-f807fa183155_1.zip | successful | 0 | 20 | 6 Mar |
| 2a09259b-bca1-4d8b-9acc-c0be285728d_1.zip | successful | 0 | 20 | 6 Mar |
| 7897a3f-7b15-4e6b-954c-2f6a6b0c6b5_1.zip | successful | 0 | 20 | 6 Mar |
| f900b49-280c-4476-a349-3d348b18b171_1.zip | successful | 0 | 20 | 6 Mar |
| 8a6ba34e-a288-47a7-b770-a1ab6c19081a_1.zip | successful | 0 | 20 | 6 Mar |
| 8a6ba34e-a288-47a7-b770-a1ab6c19081a_1.zip | successful | 0 | 20 | 6 Mar |
| f8472a46-550a-4610-a652-16f108d52ab6_1.zip | successful | 0 | 20 | 6 Mar |

Taxable amount -10000
VAT -2000

TAP has today invoices booked,
which your ERP will see in the
next 15 days

In case of pre-filling, disconnect
is certain

New e-invoicing process

6- AP e-invoice vs commercial flow

Quiz: Velocity difference, what would YOU do?

Scenario

Vendor sent the tax invoice to government and to YOU

But

- Booking is delayed on your side (received late, booking late, Approval is late,...) → Input VAT not booked, however Already in portal

I deduct the VAT
Since govt has
this amount
already

What do
you do?
(1 month to
decide)

I don't deduct since
My accounting prevails

If you prevail ERP data, you have to reject invoices not booked → Vendor alerted → Next period CN + New invoice

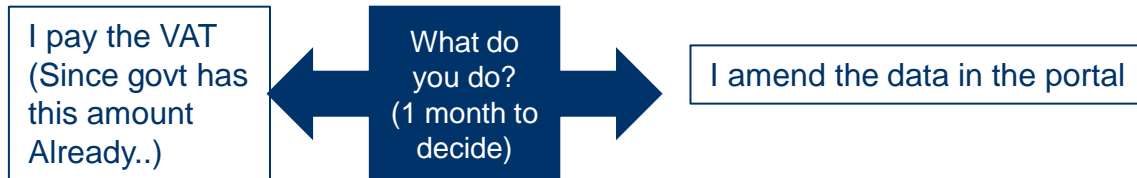
Conclusion: You wouldn't do this a second time...

6- AP e-invoice vs commercial flow disconnect

Quiz: What can go wrong, AR Invoices vs Credit note

Scenario

You invoiced customers with VAT. Invoices went out →
But an error was detected → invoice was credited...BUT
Credit notes electronically delayed
→ Portal says you owe the VAT, fully.



You cannot reject/Credit your own invoice other than some days after emitting VAT is due.

6- AP e-invoice vs commercial flow disconnect

Quiz: What can go wrong, AP Commercial OK & AP e-invoice missing

Scenario

Vendor sent the tax invoice to government and to YOU

But

- Vendor was misinformed about YOUR VAT ID. He assigned the deductible VAT to another taxpayer.
- Commercial document was successfully processed and booked
- Result: we have an ERP deductible, **but missing in** Taxpayer's portal

I accept for this
Period to not deduct
that VAT +
I hope it appears in future
periods

What do
you do?
(1 month to
decide)

I amend the data in the portal

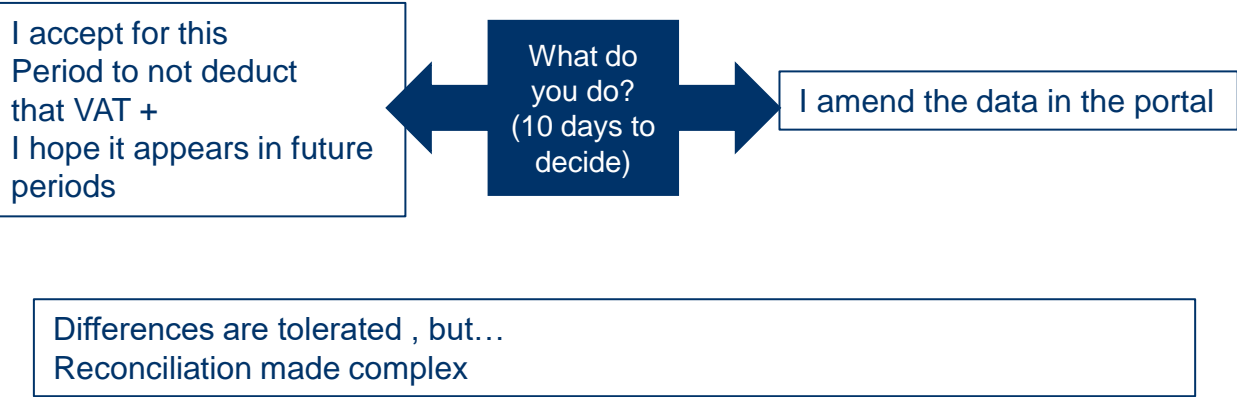
You cannot deduct the VAT of missing e-invoice. The commercial invoice is no longer an invoice, it's a notification.

6- AP e-invoice vs commercial flow disconnect

Quiz: What can go wrong, Local Currency rate (LC) for Foreign Currency(FC) invoice

Scenario

- Invoices received from vendors are booked in FC booked at wrong country rate → Amounts differs with portal (fed by vendor's rate)
- Cumulated differences visible at month end
- Differences is also visible on a day by day basis on government portal



AL81-3811 - Transalbania Ltd. - Albania Invoice Information (U-PCM1-491)

| | | | | | | | |
|------------------------------------|--|-----|---|--------------------------|--------|----------|----------|
| 1 | Sherbime Ngarkimi (LPC 03 EXP)Euro | COP | 1 | 95 | 95 | 0 | 95 |
| 2 | Sherbime Ngarkimi -je tjera (LPC03)EXP: Euro | COP | 1 | 270.83 | 270.83 | 54.17 | 325 |
| 3 | Sherbime Dokumentacioni (BLE FEE)Euro | COP | 1 | 8.33 | 8.33 | 1.67 | 10 |
| 4 | Sherbime kasje me Stakeri(iti oniot.RTR06)Euro | COP | 1 | 15 | 15 | 3 | 18 |
| KURSI / KEMBAMT EUR / LEK 1:112.14 | | | | TOTALI NE EUR | | 389.16 | 58.84 |
| | | | | TOTALI NE LEK | | 43,640.4 | 6,598.32 |
| | | | | Furnizime te tatueshme | | 294.16 | |
| | | | | Furnizime te paratueshme | | 95 | |

Udhëzime të përdoruesit: Përdoruesit i mallrave dhe shërbimeve të porositura në bazë të kontratës

NIVP: e65e1282-4270-4b30-b7b0-a41e360ec36d

NSLP: 4F4880231561DACA121B10408163C88B

Kodi i vendit të ushtrimit të veprimtarisë së biznesit: z4131985, Lajja nr.3, Rruga Egnatia, Kulla "Ry", Kati i 1

Kodi i Operatorit: aw080c017

Data dhe ora e lëshimit të faturës: 26.04.2023 10:56:35

Mënyra e pagesës: Me bankë

Logging No./Doc ID: E100002313 / DC9524619C

Item Number: 1553/2023

Traffic Code:

Cred. Code/Abbr: C000353/CMA CGM AL

Item Date: 26/04/23 (DDMMYY)

Transport Ref: BMD

Item Amount: EUR 448.00

Due Date: 26/05/23 (DDMMYY)

Particular:

VAT Amount: EUR 58.84

Branch / Centre: 10 - IS

Attention:

Net Amount: EUR 389.16

Ex.Rate: 113.2700000000

Image Source: T

Status: Booked

Indexer: scon_batch

Cancelled by:

Next Approver: No Approver

Voucher No.: 20230441267788

Posting Status: Post

Posted By: asorenc.sulaj

LTI Number:

Withholding Tax Amount:

Original Invoice Number:

Original Invoice Date:

(DDMMYY)

Supply Nature:

Tax Type:

Place of Supply:

Memo:

Show LC

Query Code:

| Seq | Inter Co./Job File No. / GL Account | C.Code | Amount | Amount in LC | Remarks | VAT | VAT(%)Centre |
|-----|-------------------------------------|--------|--------|--------------|-------------|-----|--------------|
| 1 | AL81 1052341525-0004 | 120 | 294.20 | 33,324.03 | Taxable am. | 1 | 20.00 10-ES |
| 2 | AL81 1052341525-0004 | 100 | 94.96 | 10,756.12 | non taxable | 0 | 10-ES |

Item

Total

Total in LC

VAT

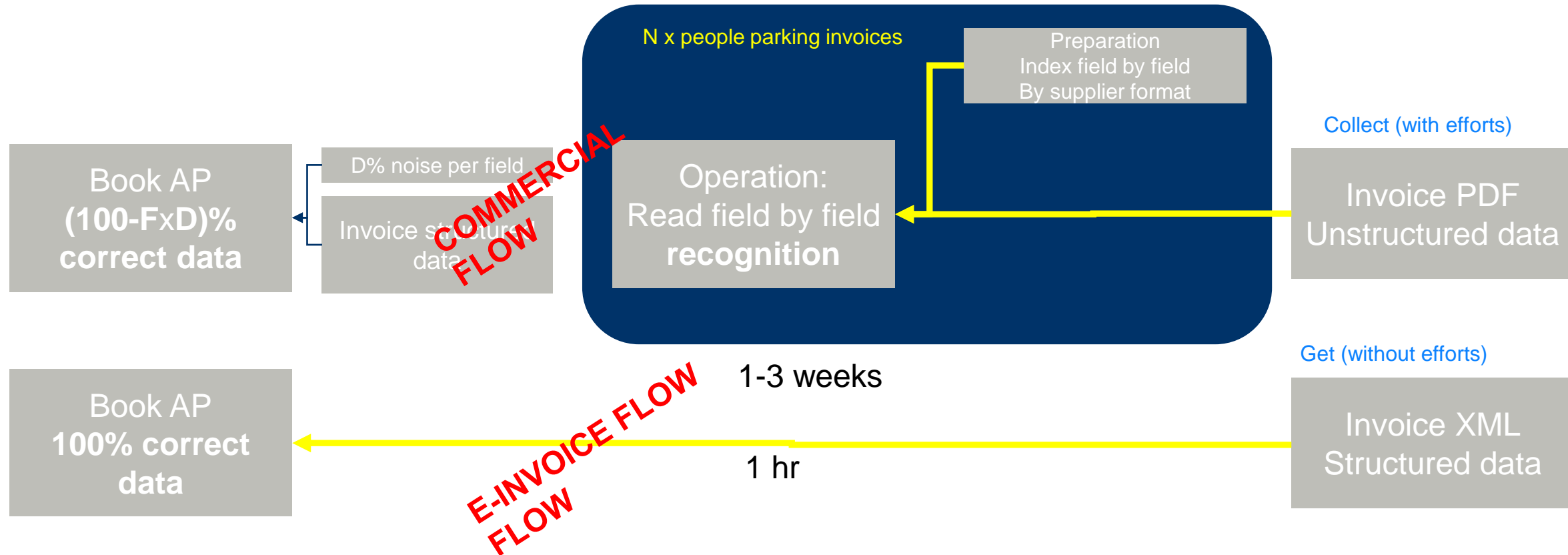
VAT in LC

Action History

| User Name | Action Date | Remarks |
|---------------|---------------------|---|
| asorenc.sulaj | 27/04/2023 17:42:48 | Approve Non-PO Item in Business Unit level: Booked |
| scon_batch | 26/04/2023 18:00:55 | Item image uploaded |
| whs.permal | 26/04/2023 18:00:55 | Non-PO Item Acknowledged By Accrual |
| scon_batch | 26/04/2023 18:00:55 | Index Item Parsed E1-UUD: Tba52645-e6b5-5f69-ba0d-612896086e generated fr |

Consideration 6

Deciding what is your AP source



AP process is much more difficult, and requires to take substantial choices

- Organizational changes are massive
- Process must be rethought in depth
- E-invoice AP flow may obsolete large portions of some departments

Consideration 6

List of issues in AP

Invoices arrive in TAP, then come to taxpayer

The main problems to resolve:

1. **Velocity of e-invoice vs. velocity of commercial document**
2. **Master data discrepancies**
3. **Commercial invoice booked may differ from e-invoice (x-rates, date of charge)**
4. **Missing commercial reference (most XML do not have it mandatory)**

Consequence

- AP is very difficult to reconcile.
- Primary requirement: define XML is primary
- Create combination protocol to obtain all data from Commercial Document
- Define partition of suppliers (subject/not subject to e-invoicing)
- Review cut-off period protocols

Overall, 2 major reorganizations:

- AP process has to shift to e-invoice and commercial invoice shall decrease in processing importance
- As portal “is the truth”, Indirect Tax needs to start a reconciliation function with tax portals

Issues?

- Master data missing
- Master data incorrect
- Downtime TAP
- Downtime of your provider
- Data error in interface
- Etc...

Consideration 6

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Consideration 7

Technical issues: how often does tech schema change?

- How often does the mapping scheme change for AR and AP? (At least 1 after 3months, usually 1-3 times per year1 month)
 - Worst case: Indonesia 2024-2025
 - Best case: Romania (1 time)
- How much time in advance do you have the latest scheme of e-invoicing?
 - 1 to 2 months, maximum

Master data cleanup will be required. No country had an easy master data use case, because e-invoicing master data is different than for analog world

- 1 month in general to cleanup all.
- Who's in charge for the end to end run?

Consequence: Be clear on the “equation to solve”. KN’s equation,

- Clarify ownership of interfacing, operation, and reconciliation
- 4 weeks implementation excluding master data cleanup
- Change of mapping occurs with a notice of 1 week, IT needs to be reactive
- Central development, customizable (i.e. reusable) components. No development “a la carte”, no “own local” solution
- Central operation from one place on Earth
- High cooperating interaction between operation & development
- High cooperating interaction between operation & reconciliation

as an example

- Indirect Tax
- Indirect Tax
- Tax IT
- Tax IT
- Indirect Tax
- Indirect Tax
- Indirect Tax

Considerations 8

An example of our model at KN – Our approach

We have implemented

- Central ownership of data transmitted and received
- Central operations day to day
- Central reconciliation

Central IT team

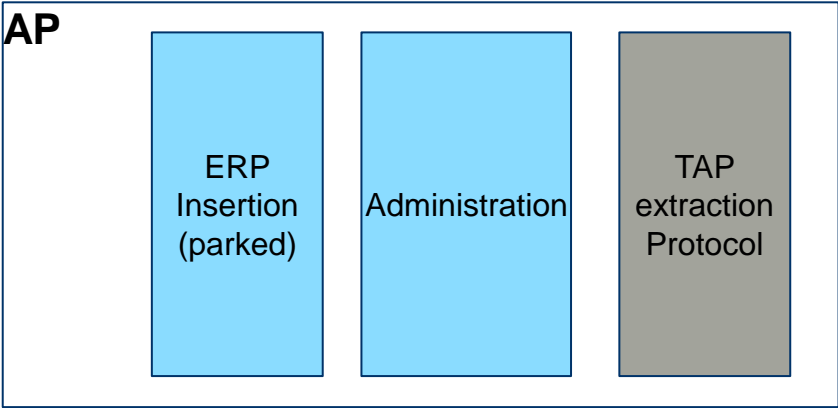
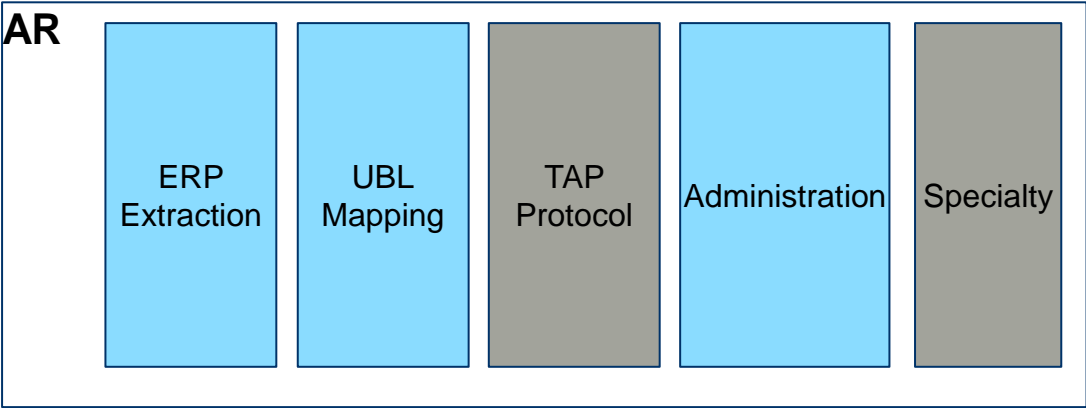
Central Operations

Central reconciliation team

Considerations 8

An example of our model at KN – Technical layers

Legend
80% synergy between implementations
No synergy



Integration steps

ERP extraction: get data from invoices and credit notes

UBL mapping: create the mapping from ERP to UBL data. There is 80% synergy between countries.

TAP protocol: The connection, token receiving, token renewal, API sequence protocol. Each country 100% different.

Administration: All management of own company documents; recovery of IRN, overlaying The invoice, saving in ERP, signal creation

Specialty: Depending on communication with customers, how to inform of einvoice status

Integration steps

TAP extraction protocol: How to obtain AP einvoice from TAP

Administration create the mapping from UBL to ERP, save einvoice, determine vendor codes, determine budget of booking, GL account determination, VAT code determination, prepare data for automated reconciliation

ERP Insertion: insert the e-invoice in parked modus

Consideration 9: inspections from e-invoicing

India

| | Access to taxpayer data | Tax return preparation | Audit selection | Audit process | Sanctions/damage |
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☐ Traditional methods ☒ Disruptive methods

- IL, RS, EC, PE, CL
- SA
- India
- 1) Telangana- Hyd Jul 17 to Mar 2022

2) Punjab- Ludhiana 2017 + 2018

3) Gujarat- Ahmedabad 2017 to 2023

4) Karnataka- Bangalore 2017

We are in stage 4 for the audit process ... Only.
Expected: Stage 4 continues for 2y more with TDS + CIT integration, payment integration, real-time obligations, probably eReceipts.

Consideration 9

The “faceless inspections”

Taxing times: Why are so many companies getting GST notices?

ET Online • Last Updated: Jan 03, 2024, 06:21:57 PM IST

Synopsis

The tax authorities have been shooting off tax demand notices for several months now. Tax officers sent around 33,000 GST notices to businesses for discrepancies in returns filed and short payment of taxes in 2017-18 and 2018-19 financial years, a CBIC official told ET in early December.



India Inc is now going back to the drawing board to account for tax liabilities before inking deals and finalising other business transactions.

On the New Year day, Life Insurance Corporation of India (LIC) got a demand notice of about Rs 806 crore for alleged short payment of Goods and Services Tax (GST) for 2017-18. LIC has received the communication/demand order on Monday for collection of GST along with interest and penalty for Maharashtra state. A day later, LIC was slapped with another tax demand, this

time for Telangana state.

Yesterday, Hindustan Unilever (HUL) said it has received a GST demand with penalties of Rs 447.5 crore from authorities of five states over issues such as disallowance of GST credit and salaries including allowances paid to expats. Last week, food-delivery platform Zomato said it received notices from the tax authorities in Delhi and Karnataka over alleged short payment of GST in 2018 amounting to Rs 4.2 crore.

Videos



rael takes out Hamas puty leader



Centre to notify CAA rules 'much before' LS polls

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Latest from ET

1. SC verdict explained: 5 reasons why it's happy new year for Adani

Gopal Krishna Mundhra, partner at Economic Laws Practice (ELP), had told ET, "Several thousands of system-generated notices have been sent to taxpayers without specific allegation and without any application of human mind, merely on the basis of mismatch between GSTR1, GSTR 3B, GSTR 2A, GSTR 9, e-way bills and some reports generated through GST portal." He said these notices lack clarity on tax applicability. "Also, many taxpayers are... (receiving) notices issued by multiple authorities on the same subject. Corporates are agonising over this," said Mundhra, adding that they were seeking legal recourse, wasting significant time and energy to counter the unwanted litigation.

A flood of GST notices can also be attributed to technology. Tax authorities use technology to issue thousands of time-sensitive notices at the click of a

button. An automated return scrutiny module is integrated into a backend application that leverages data analytics to identify discrepancies and risks in GST returns. Consequently, discrepancies in statutory returns are flagged up and a system-generated scrutiny notice is issued to the taxpayer, ET has reported.


Another reason why so many companies got notices in the last months of 2023 was a looming deadline. For the fiscal 2018-19, the deadline December 31, 2023, which was extended to March 31, 2024.

Consideration 9 - Romania, 5.09.2024

E-invoicing started 1.1.2024

07:52 insightful

VoLTE 4G+ 5%

 **EY**
9,254,014 followers
17h • Edited •

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Today, September 5, 2024, companies registered for VAT purposes received, according to the plan, the first pre-filled VAT return prepared by the tax administration for July 2024 through RO e-VAT.

Read more: <https://go.ey.com/4cWEVz5>.


#EYTax #eTVA
Georgiana Iancu (Trusca)


Show original • Translation settings

EY Tax

“
Așadar, vedem cum se așează toate datele extrase din RO e-Factura, RO e-Case de marcat electronice, RO e-Transport, Declarațiile 390 și 394, Situația importurilor/exporturilor de la vamă sub poza centralizată a decontului de TVA precompletat, atât pentru TVA colectată, cât și pentru TVA deductibilă. Chiar și în lipsa unor diferențe semnificative notificate de ANAF, companiile ar trebui să revizuiască cu atenție decontul precompletat primit, precum și sursele de date puse la dispoziție de administrația fiscală, pentru a se asigura de corectitudinea datelor. Înainte de toate, e-TVA este o poză a modului în care inspectorii fiscali se vor raporta la datele primite din partea companiilor pentru a testa conformarea în colectarea TVA.”

Georgiana Iancu
Partener, Coordonatorul Practicii de Taxe Indirecte și Digitalizare Fiscală



 Georgiana Iancu (Trusca) and 69 others

7 reposts

III

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Consideration 9: Italy, 15.08.2024

E-invoicing started 01.01.2021



Edited by Andrea Werner Beilin, Francesco Maria Mariani e Francesco Turri

As provided by the Act no. 29534/2024 of 15 July 2024, the Italian Tax Authorities are sending several "compliance letters" to the taxpayers.

The "compliance letters" are notices through which the Italian Tax Authorities report discrepancies related to the FY 2021, detected as a result of cross-checking activity performed on the data available to the tax authorities themselves.

In particular, the controls are made by cross checking:

- The data related to the **electronic invoices** issued for the sales of goods and provision of services carried out between entities resident or established in Italy and to Public Administrations;
- The data of the **daily electronic consideration** transmitted to the Italian Tax Authorities;
- The data included in the **annual VAT return**.

The following information are included in the compliance letters:

1. The taxpayer data;
2. Number of the communication and year of reference;
3. Act code;
4. Total transactions that are subject to VAT and to the reverse charge mechanism transmitted electronically by the taxpayer;
5. Modalities for consulting the information on the detail of the discrepancies;
6. How to request information and how to provide further elements to the Italian tax authorities;
7. Ways to regularize the taxpayer's position.

Consideration 9; Greece, 15.06.2024

E-invoicing started 01.01.2024

<https://www.taxheaven.gr/news/68058/dhlwseis-fpa-stadiakh-meiwsh-epitreptwn-oriwn-apoklishs>

By decision of the Deputy Minister of Finance Christos Dimas, following a proposal by the Governor of AADE Giorgos Pitsilis, **the permissible limits of tax declaration deviations in relation to the corresponding data that have been transmitted to the myDATA digital platform for the following VAT tax periods are redefined** as follows:

→ **From on 01/01/2024 up to and including 06/30/2024** a thirty percent (30%) **remains in force** in the case of revenue data, as well as thirty percent (30%) in the case of expense data.

→ **From 01/07/2024 to 30/09/2024** it is reduced to ten percent (10%) in the case of revenue data, as well as to twenty percent (20%) in the case of expense data.

→ **From 01/10/2024 to 31/12/2024** at zero percent (0%) in the case of revenue data, as well as at five percent (5%) in the case of expense data.

→ **As of 01/01/2025, the permissible limits of deviations in the case of income and expenditure data_per tax period of VAT declaration cease to exist** in relation to the corresponding data transmitted to the myDATA digital platform.



Tolerance still 5% on AP;
They know AP is most complex



Contact VCARD

To contact me