



E-invoicing & Digital Reporting Global Updates

Developments summary

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Notices

The following information is not intended to be “written advice concerning one or more Federal tax matters” subject to the requirements of section 10.37(a)(2) of Treasury Department Circular 230.

The information contained herein is of a general nature and based on authorities that are subject to change. Applicability of the information to specific situations should be determined through consultation with your tax adviser.



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In a global digital economy, tax administrations are constantly striving for visibility of the end to end supply process through the use of technology tools that automate the tax reporting process, from e-invoicing to digital reporting and e-accounting, the world of taxation and compliance is being digitalized.

The evolution of tax technologies used by the tax administrations is disruptive, and promotes radical changes in the way that taxpayers interact among themselves, with their customers, related parties and with the government.

Governments will continue to move forward on their technological evolution path that translates into the continuous issuance of new regulations and requirements imposed on taxpayers, having a proactive approach to these changes with a defined tax technology strategy that includes an e-invoicing and digital reporting policy will provide organizations with cost savings and efficiencies.

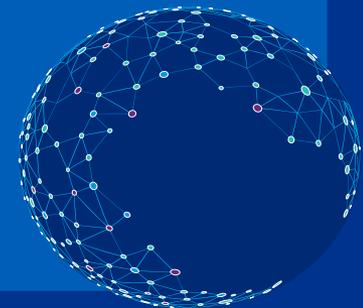
To assist business in keeping track of tax administration developments in e-invoicing and digital reporting, we have created this global tracker. We hope it assists you.



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➡ If you would like to receive e-invoicing & digital reporting updates, please [subscribe to the KPMG "Indirect Tax" TaxNewsFlash](#).

E-invoicing & Digital Reporting Key Dates



01

Europe

2002
The Netherlands
introduces *Digital Reporting*

02

South America

2003
Chile introduces
e-invoicing

03

Asia

2008
Singapore
introduces e-
invoicing.

04

Africa

2012
South Africa
introduces e-
invoicing.

05

North America

2014
Mexico
introduces e-
invoicing.

06

Australia

2022
Australia will
introduce e-
invoicing

Terminology

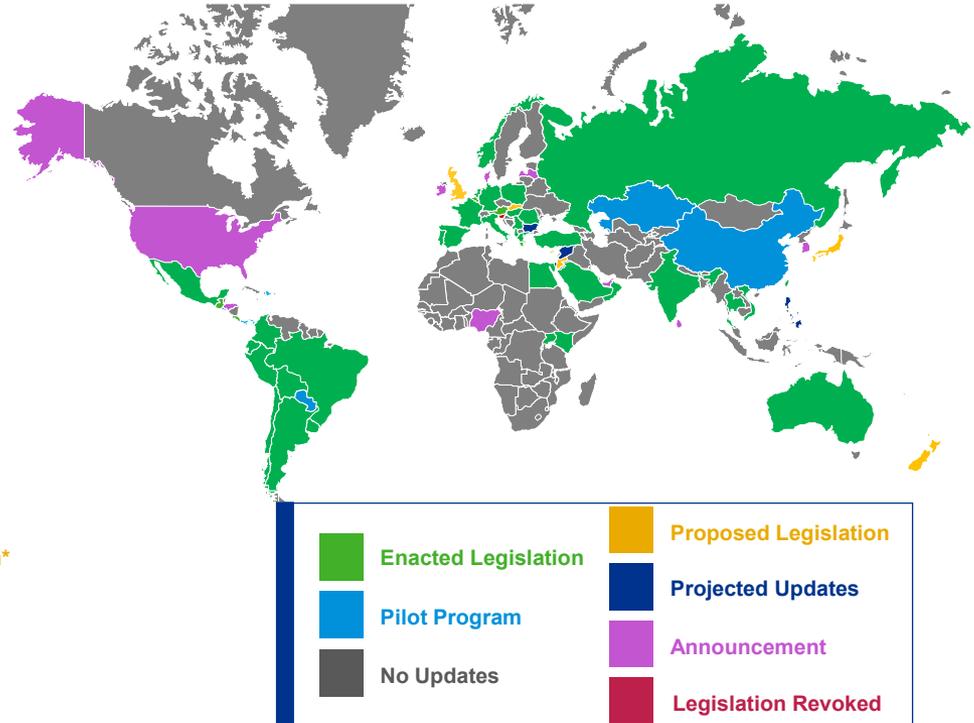
For the purposes of this document, the terms and acronyms outlined below are defined as follows:



Term	Definition
B2B	Business to business transaction
B2C	Business to consumer transaction
B2G	Business to government transaction
Digital Reporting	Means of reporting tax information to tax authorities by digital means
E-invoice	Electronic invoice that is processed, transmitted, and received in a specified electronic format
G2G	Government to government transaction
PEPPOL	Pan-European Public Procurement Online. A common framework standardizing cross-border exchange of electronic documents (e.g., electronic invoices)
SAF-T	Standard Audit File for Tax. XML based international reporting standard for the electronic exchange of tax data.
XML	Extensible Markup Language. Text based format which is designed to store and transport data in a structured manner.

E-invoicing & Digital Reporting Global Updates 2021

- | | | |
|----------------------|-------------------|---------------------|
| 1. Albania* | 38. Georgia | 75. Rwanda* |
| 2. Andorra | 39. Ghana | 76. Saudi Arabia* |
| 3. Antigua | 40. Greece* | 77. Serbia* |
| 4. Armenia | 41. Guatemala* | 78. Sierra Leone |
| 5. Argentina* | 42. Honduras* | 79. Singapore |
| 6. Australia* | 43. Hungary* | 80. Slovakia* |
| 7. Austria* | 44. Iceland | 81. Slovenia* |
| 8. Barbados | 45. Ireland* | 82. South Africa |
| 9. Bahamas | 46. India* | 83. South Korea* |
| 10. Bahrain | 47. Indonesia | 84. Spain* |
| 11. Bangladesh | 48. Israel | 85. Sri Lanka* |
| 12. Barbados | 49. Italy* | 86. Sweden |
| 13. Belarus | 50. Japan* | 87. Switzerland |
| 14. Belgium* | 51. Jordan* | 88. Syria* |
| 15. Bhutan | 52. Kazakhstan* | 89. Taiwan* |
| 16. Bolivia* | 53. Kenya* | 90. Tajikistan |
| 17. Brazil* | 54. Latvia* | 91. Tanzania |
| 18. Bulgaria* | 55. Lithuania | 92. Thailand* |
| 19. Cameroon | 56. Luxembourg | 93. Turkey* |
| 20. Canada | 56. Malaysia | 94. Uganda* |
| 21. Chile* | 57. Malta | 95. Ukraine |
| 22. China* | 58. Mauritius | 96. UAE* |
| 23. Colombia* | 59. Mexico* | 97. United Kingdom* |
| 24. Costa Rica* | 60. Moldova | 98. United States* |
| 25. Croatia | 61. Netherlands* | 99. Uruguay* |
| 26. Cyprus* | 62. New Caledonia | 100. Uzbekistan |
| 27. Czech R. | 63. New Zealand* | 101. Vietnam* |
| 28. Denmark* | 64. Nigeria* | 102. Zimbabwe |
| 29. Dominican R.* | 65. Norway* | |
| 30. Ecuador* | 66. Oman* | |
| 31. El Salvador* | 67. Panama* | |
| 32. Egypt* | 68. Paraguay* | |
| 33. Estonia | 69. Peru* | |
| 34. Fiji | 70. Philippines* | |
| 35. Finland | 71. Poland* | |
| 36. France* | 72. Portugal* | |
| 37. French Polynesia | 73. Romania* | |
| 38. Germany* | 74. Russia* | |



"The designations employed and the presentation of material on this map do not imply the expression of any opinion on the part of KPMG LLP concerning the legal status of any country, territory, city or any area or of its authorities or concerning the delineation of its frontiers or borders."

* Jurisdiction has several laws/proposals/public announcements in place. Refer to the detail slides for more information. *If further details are required, please contact KPMG.*

→ This document provides insight into recent developments, for a comprehensive historical roadmap of countries that have implemented e-invoicing & digital reporting, please contact KPMG.

 Enacted Legislation

 Proposed Legislation

 Pilot Program

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 Revoked Legislation

	Country	Status	Effective date	Brief description
	United States		2022	In July 2021, the United States Business Payment Coalition (BPC) in collaboration with the Federal Reserve have joined efforts to create and implement an e-invoicing pilot program based on the PEPPOL network model. A specific date has not been published, however activities are expected to be resumed in 2022. 165

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	Country	Status	Effective date	Brief description
	*Argentina	✓	March 1, 2021	The Argentine tax authority (“AFIP”) requires the following taxpayers to include a rapid response QR code in electronic invoices (and electronic debit and credit notes): 1
			June 1, 2021	a) Effective March 1, 2021, for taxpayers with total transactions above ARS 10,000,000; b) Effective April 1, 2021, for taxpayers with total transactions above ARS 2,000,000 and below or equal to ARS 10,000,000; c) Effective May 1, 2021, for taxpayers with total transactions above ARS 500,000 and below or equal to ARS 2,000,000; and d) Effective June 1, 2021, for the remaining VAT registered and small taxpayers.
			May 1, 2021	The AFIP has established deadlines for the mandatory replacement of electronic invoicing equipment (<i>controladores fiscales</i>) with new ones based on the quantity of old e-invoicing equipment currently in use: 2
			February 1, 2022	a) May 1, 2021 to June 30, 2021 for 50 or more units of old equipment; b) July 1, 2021 to August 31, 2021 for between 11 and 49 units of old equipment; c) September 1, 2021 to October 31, 2021 for between 5 and 10 units of old equipment; d) November 1 to December 31, 2021 for between 3 and 4 units of old equipment; e) January 1 to February 28, 2022 for between 1 and 2 units of old equipment. → Updates for Argentina continue on next page.

* This country has multiple updates in addition to the ones provided in this section, if you require further information please contact KPMG.

6 Latin America (continued)

✓ Enacted Legislation
● Proposed Legislation
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✗ Revoked Legislation

	Country	Status	Effective date	Brief description
	*Argentina (continued)	✓	April 12, 2021	<p>The Secretariat of Small and Medium Enterprises has updated the minimum amount that will trigger the requirement to issue a credit e-invoice, which is a special e-invoice that small and medium enterprises must issue. The Secretariat further updated the minimum amount following which companies must compulsorily issue an electronic credit invoice to ARS 195,698 per transaction. The new amount will take effect for all vouchers issued as of April 12, 2021.</p> <p>The purpose of the Electronic Credit Invoice Scheme is to promote a mechanism that improves the financing conditions of micro, small and medium-sized companies and allows them to increase their productivity, through the early collection of credits and receivables issued to their customers. clients and/or debtors. 3</p>
			April 1, 2021	Effective April 1, 2021, Argentina launched a tax authority web-portal through which taxpayer are required to issue of debit and credit notes will be enabled. 4
			December 21, 2021	<p>The AFIP issued General Resolution 5022/21, which establishes a new deadline for VAT registered taxpayers to update their invoicing systems to issue invoices type "A" to small taxpayers ("Monotributistas"). The deadline was postponed from July 1, 2021 to December 1, 2021. Before December 1, 2021, taxpayers without an updated system will be required to identify invoices to small taxpayers by including the following statement: "Receptor del comprobante - Responsable Monotributo ". 5</p>
			November 1, 2021	<p>The AFIP recently issued General Resolution No 2758 and General Resolution No 4458, which establish changes for the electronic invoice for export transactions by upgrading the technical specifications to version 2. The changes are effective as of November 1, 2021.</p> <p>In addition, the AFIP recently issued General Resolution 5017/2021, which requires taxpayers to issue e-shipping notes when shipping goods effective November 1, 2021. 6</p>

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6 Latin America (continued)

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	Country	Status	Effective date	Brief description
	Bolivia	✓	TBD	<p>The Bolivian Tax Administration (<i>Servicio de Impuestos Nacionales</i>) is currently in the process of coordinating the mandatory implementation of a new e-invoicing system.</p> <p>In this respect, the tax authority issued a new e-invoicing resolution (Resolution No N°10200000017), which implements three different modalities for the adoption of voluntary e-invoicing: electronic invoicing online, computerized e-invoicing and web portal e-invoicing. 7</p>
			December 1, 2021	<p>The Bolivian Tax Administration (<i>Servicio de Impuestos Internos, SIR</i>) recently issued Resolution No 102210000011, which establishes the mandatory issuance of e-invoicing effective December 1, 2021. The mandatory rollout will be phased-in based on selected taxpayers listed in targeted resolutions published by the SIR. In this respect, the SIT issued Resolution No 10210000012 on August 11, 2021 establishing the first list of large taxpayers that should comply with the e-invoicing mandate effective December 1, 2021. 8</p>
	*Brazil	✓	June 22, 2021	<p>Effective June 22, 2021, Brazil implemented a digital infrastructure for the proof of delivery (i.e., goods receipt), which supports the capture of images and records of e-tax documents used by companies issuing electronic invoices (i.e., NF-e). 9</p>
			May 25, 2021	<p>On March 26, 2021, the Brazilian tax administration (“<i>SEFAZ</i>”) published Technical Note 2021.002 – v1.0, which includes changes on the creation and validation rules of the NF-e as well as updates in some NF-e fields. The test environment became available April 26, 2021 and the changes are required to be implemented in the production environment effective May 25, 2021. 10</p>

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6 Latin America (continued)

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	Country	Status	Effective date	Brief description
	Chile	✓	January 1, 2021	Effective January 1, 2021, Chile requires all taxpayers currently issuing e-invoices to issue e-tickets (<i>Boleta de Venta</i>) for all debit and credit card transactions.
			March 1, 2021	Effective March 1, 2021, all taxpayers not issuing e-invoices are required to issue e-tickets. 11
	*Colombia	✓	August 1, 2021	The tax administration of Colombia (" <i>DIAN</i> ") recently published Resolution No. 000012, which establishes the second version of the technical annex for e-invoices. Annex 1.8 modifies some of the mandatory fields of the e-invoice template. These changes have been postponed from May 9, 2021 to August 1, 2021. 12 Resolution No. 000012 further establishes new rules requiring VAT registered taxpayers to issue specific documentation (" <i>Documento Soporte</i> ") when purchasing goods or services from a vendor who is not required to issue e-invoices. These changes have been postponed from July 1, 2021 to August 1, 2021. 13
			September 1, 2021	The DIAN recently published Resolution No. 000013 which establishes new e-payroll requirements. The implementation will be based on the following timeline included in the resolution: 14
			December 1, 2021	a) Companies with 251 or more employees (Group 1) effective September 1, 2021; b) Companies with 101 – 250 employees (Group 2) effective October, 1 2021; c) Companies with 11 – 100 employees (Group 3) effective November 1, 2021; and d) Companies with 1 – 10 employees (Group 4) effective December 1, 2021 → <i>Updates for Colombia continue on next page.</i>

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	Country	Status	Effective date	Brief description
	*Colombia (continued)	✓	April 28, 2021	On January 28, 2021, the Ministry of Health and Social Protection published Resolucion No. 084, which outlines additional health sector data which must be included in XML format for e-invoices. 15
			July 31, 2021	Subsequently, on June 22, 2021, the Ministry of Health and Social Protection published Resolucion No. 506, which outlines further additional health sector data fields which must be included in e-invoices.
			January 31, 2022	On July 30, 2021, the DIAN published Resolucion 000063, which provides additional guidelines for the "equivalent document," "support document," and the "e-payroll document" (<i>Documento Equivalente, Documento Soporte and Nomina Electronica</i>). In addition, Resolucion 00063 postpones the implementation date for the mandatory issuance of the "support document" from August 1, 2021 to January 31, 2022. 16
			September 14, 2021	On September 14, 2021, the tax authority of Colombia (DIAN) published the "Social Investment Act," which, among other things, establishes the following: 17 <ul style="list-style-type: none"> — The use of information collected from e-invoicing transactions for the issuance by DIAN to pre-fill income tax returns. Taxpayers are allowed, within two months after the notification of the income tax calculations, to make the corresponding payment or to report their own calculation of income taxes based on the e-invoicing data for the given month. — Deny VAT credits supported by receipts issued by point of sales systems. Taxpayers eligible for VAT credits must be in possession of a valid e-invoice to support the claim.

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	Country	Status	Effective date	Brief description
	Costa Rica	✓	May 13, 2021	Effective May 13, 2021, Costa Rica allows the use of e-invoicing as the basis for a judgement for judicial collection. The affected party must present the e-invoice with the digital signature of the debtor (or an authorized third party) and proof of payment of the digital stamps before the judicial court. 18
			October 19, 2021	Costa Rica recently published Law 10039, which establishes that e-invoices constitute negotiable instruments that can be transmitted by endorsement. 19
	*Dominican Republic	●	January 1, 2020	<p>Following the successful rollout of an e-invoicing pilot project, on January 9, 2020, the tax authority of the Dominican Republic (<i>Dirección General de Impuestos Internos – “DGII”</i>) published General Regulation 01-2020, establishing the implementation of e-invoicing in the country.</p> <p>The e-invoicing system currently applies on a voluntary basis. Taxpayers that meet the requirements established in the regulation issued by the DGII have been allowed to issue Electronic Tax Receipts (e-CFs). 20</p>
				<p>The DGII continues to provide functional specifications during the current e-invoicing pilot phase, among the most relevant is the modification of Section 4 of the technical e-invoicing documentation v1.0, which includes a new specification related to the reception, communication and consultation of the e-invoicing via web services. 21</p>
		✓	June 14, 2021	On June 14, 2021, the DGII issued General Rule No. 06-2021, which provides guidance on the issuance of authorized sequence invoices for new taxpayers by modifying General Rule 06-18. The timeframe to obtain authorized sequence invoices was reduced from 10 to 5 days. 22

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6 Latin America (continued)

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	Country	Status	Effective date	Brief description
	*Ecuador	✓	June 1, 2021	Effective June 1, 2021, all B2G transactions over USD 1,000 require the issuance of an e-invoice. 23
			April 19, 2021	On March 18, 2021, the government of Ecuador issued Resolution NAC-DGERCGC21-00000015. The resolution established transitional measures for buyers to explicitly accept or reject e-invoices. 24
	El Salvador	●	June 1, 2020	The government of El Salvador launched a “Digital Agenda Plan” (Agenda Digital), which includes the implementation of an e-invoicing pilot program that initially includes a group of selected taxpayers. 25
	*Guatemala	✓	March 2, 2021	The tax authority of Guatemala launched a new app, <i>APP FEL</i> , which has the functionalities, design and engineering features to enable taxpayers to issue invoices from their smartphone or tablet easily, quickly and securely. 26
			April 1, 2021	Effective April 1, 2021, all B2G transactions over GTQ 2,500 require the issuance of an e-invoice. 27
			July 1, 2021	The tax authority of Guatemala (“SAT”) recently announced that all taxpayers who register as VAT withholding agents after June 30, 2021 are required to issue e-invoices through the SAT’s tax portal. 28
		●	August 24, 2021	Effective November 24, 2021, taxpayers can correct the tax base applicable to transfers of goods between Guatemala and Honduras through the FYDUCA declaration. FYDUCA is a digital reporting declaration that records imports and exports of goods between Guatemala and Honduras. 29 → <i>Updates for Guatemala continue on next page.</i>

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6 Latin America (continued)

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	Country	Status	Effective date	Brief description
	*Guatemala (continued)	✓	January 19, 2022	The SAT recently issued a series of regulatory resolutions, which include a listing of the different types of taxpayers that are required to comply with issuance of e-invoices: 30
			July 1, 2022	— Taxpayers operating in the health and the social security sectors (January 19, 2022)
			February 24, 2022	— Taxpayers registered under the VAT General Regime (July 1, 2022) — Taxpayers that provide accounting, financial, tax and auditing services (February, 24, 2022)
	Honduras	●	February 17, 2021	The tax authority of Honduras (<i>Servicio de Administracion de Rentas de Honduras</i>) recently published guidelines to assist taxpayers currently pre-printing fiscal documents through the DET Live portal (Electronic Tax Reporting Portal) with their activation or cancelation requests to print fiscal documents through the SAR-924 format. 31
	*Mexico	✓	January 1, 2021	Effective January 1, 2021, taxpayers are required to display certain items on electronic payment receipts. In addition, Mexico mandates the use of the official catalogue on the 20th annex of the <i>Resolución Miscelánea Fiscal</i> for each item's description in order to allow a deduction of the expense for VAT purposes. Through this measure, the government aims to increase control on deductible and non-deductible expenses, services and activities displayed on electronic payment receipts. 32
			September 30, 2021	On May 3, 2021, the Mexican government published a modification to the Miscellaneous Resolution for fiscal year 2021, which establishes new requirements for the electronic issuance of shipping notes (" <i>CFDI Carta Porte</i> "). Legal entities shipping merchandise or providing shipping services are required to issue the shipping note that must accompany the corresponding CFDI. The legislation is effective June 1, 2021 and the issuance of the shipping note is mandatory 120 days after. 33 → <i>Updates for Mexico continue on next page.</i>

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6 Latin America (continued)

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	Country	Status	Effective date	Brief description
	*Mexico (continued)	✓	September 30, 2021	The Mexican tax authority ("SAT") recently published several guidelines to assist taxpayers with the new requirements for the issuance of electronic shipping notes ("CFDI Carta Porte"). The guidelines contain details on the codes and descriptions that should be used, instructions on how to fill the e-shipping notes, and frequently asked questions. 34
			July 27, 2021	On July 27, 2021, the SAT published updates to the e-invoice ("CFDI") catalogues by adding new custom patents codes. 35
			January 1, 2021	The Mexican Congress approved "Tax Reform for 2022", which establishes a new version of the e-invoice (CFDI) schema upgrading its version from 3 to 4.0. The new e-invoice version 4.0 includes new validation requirements and a new rule in relation to cancellation of e-invoices indicating that these can only be cancelled in the same fiscal year in which the e-invoice was issued and under the recipient's consent. The Tax Reform will enter into effect January 1, 2022, however the effective date for the new version of the e-invoice schema is to be determined due to the current delay on the process to coordinate with the authorized certification providers (PAC'S). 36
	*Panama	●	January 2, 2021	Effective January 2, 2021, Panama rolled out an e-invoicing pilot project with requirements and regulations for taxpayers with commercial activities and professional services. 37
		✓	May 31, 2021	On May 27, 2021, the Ministry of Economy and Finance published Resolution No 201-4503, which establishes the criteria and procedures related to the guarantee that should be paid to the National Treasury Department to operate as an authorized e-invoicing provider in Panama. 38 → Updates for Panama continue on next page.

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6 Latin America (continued)

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	*Panama (continued)	✓	June 1, 2021	Effective June 1, 2021, taxpayers who have requested to voluntarily adhere to the e-invoicing regime have received approval from the tax administration (“DGI”), and are exempt from the use of fiscal equipment, will be required to comply with the e-invoicing regulations. 39 For further details click (Spanish) here .
			January 1, 2022	Effective January 1, 2022, taxpayers who have received gross income above PAB 1 million, or who have possessed more than PAB 3 million in assets are required to file a monthly report of their sales of goods and services. The first report, covering sales made in January 2022, must be filed by e-Tax 2.0 by the final day of the following month (i.e. by February 28, 2022). Information received by the tax agency from electronic invoices will be automatically added to the report, which should then be accepted or rejected by the taxpayer. 40
			January 1, 2022	The National Assembly of Panama recently published Law No 256/2021, which establishes several modifications and new requirements to the mandatory e-invoicing system, which includes that: 41
			July 30, 2022	— All new registered taxpayers will be required to adhere to the e-invoicing regulations starting January 1, 2022.
			January 1, 2023	— All government entities will be required to only accept e-invoices for all business-to-government transactions starting July 30, 2022. — All taxpayers that participated in the e-invoicing pilot program will be required to issue e-invoices starting January 1, 2023.
	*Paraguay	●	January 1, 2021	Paraguay approved the launch of a pilot program testing the functionality of the new Fiscal document issuance system called the <i>E-KUATIA</i> . The Paraguayan tax authority (“SET”) has selected the taxpayers who volunteered to participate in the program. 42 → <i>Updates for Paraguay continue on next page.</i>

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	*Paraguay (continued)	✓	July 13, 2021	On May 11, 2021, the SET published General Resolution No 90, which requires taxpayers to register all fiscal documents issued and received independently of their format in the <i>Marangatu</i> system. The Marangatu system is the Paraguayan tax authority's portal, which facilitates taxpayers' compliance obligations through several modules: taxpayer registry, payment module, etc. All VAT taxpayers must register the required information on a monthly basis in accordance with the filing deadlines. The Resolution includes a calendar with the dates on which the information should be submitted based on each fiscal period. 43
			January 1, 2022	On August 10, 2021, Paraguay published General Resolution No 95/2021, which establishes the gradual implementation of the Integrated National Electronic Billing System (SIFEN). According to the Resolution, Paraguay will first conduct a pilot plan starting January 1, 2022 where electronic billers will be authorized to issue and receive electronic documents. However, taxpayers can still issue and receive receipts from other sources.
			April 1, 2022	Further, Paraguay will start a voluntary phase effective April 1, 2022 where taxpayers who wish to join the SIFEN as electronic billers will be required to comply with the authorization process that will be established by the tax authority. 44
	*Peru	✓	April 1, 2021	Effective April 1, 2021, Peru implemented new requirements on the issuance of electronic invoices, credit notes, and payment receipts. 45 → <i>Updates for Peru continue on next page.</i>

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6 Latin America (continued)

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	*Peru (continued)	✓	September 1, 2021	On March 22, 2021, the tax authority of Peru (“SUNAT”) published Resolution No. 042-2021, which postpones the effective date for the implementation of the new requirements on the issuance of electronic invoices, credit notes, and payment receipts from April 1, 2021 until September 1, 2021. In addition, the Resolution introduces changes to certain fields included on the “Sales and Income Registry” as defined in Annex 2 of the Resolution No. 286-09. Annex 2 contains the “structure and information for electronic books and records.” 46
			January 1, 2022	On May 26, 2021, the SUNAT published Emergency Decree 050, which temporarily modifies the deadline to issue and make an e-invoice available to the recipient and the SUNAT. In this respect, taxpayers have four days to make e-invoices available until December 31, 2021. Effective January 1, 2022, taxpayers must make e-invoices available within 2 days. 47
			January 1, 2022	The Peruvian tax administration (SUNAT) has issued Resolution No 000150-2021, which establishes a new timeframe for the submission of e-invoices and corresponding e-documents as follows: 48 <ul style="list-style-type: none"> — Until December 16, 2021, taxpayers have 7 days from the day of issuance to submit e-invoices, e-debit and credit notes to the tax authority or to the certified provider; — Between December 17, 2021 and December 31, 2021, taxpayers have 3 days from the day of issuance to remit e-invoices, e-debit and credit notes to the tax authority or to the certified provider; and — Effective January 1, 2022, taxpayers have 2 days from the day of issuance to submit e-invoices, e-debit and credit notes to the tax authority or to the certified provider. → Updates for Peru continue on next page.

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	Country	Status	Effective date	Brief description
	*Peru (continued)	✓	January 1, 2022	<p>On August 27, 2021, the Peruvian tax administration (SUNAT) published Resolution No 000128-2021, which establishes thresholds and timelines for the issuance of e-invoices, e-receipts and related e-documents as follows: 49</p> <ul style="list-style-type: none"> — Taxpayers with annual revenues equal or above 75 fiscal units (UIT) are required to issue e-invoices and e-receipts effective January 1, 2021; — Taxpayers with annual revenues equal or above 23 fiscal units but less than 75 fiscal units are required to issue e-invoices effective January 1, 2022 and e-receipts effective April 1, 2022; and — Taxpayers with annual revenues below 23 fiscal units (UIT) are required to issue e-invoices effective April 1, 2022 and e-receipts effective June 1, 2022.
			April 1, 2022	
			June 1, 2022	
	Uruguay	✓	October 1, 2021	<p>On May 27, 2021, the tax authority of Uruguay (“DGI”) published version 22.1 of the e-invoicing format. The testing environment to validate the new functional specifications will be available effective September 1, 2021 and the production environment will be available effective October 1, 2021. 50</p>

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	Country	Status	Effective date	Brief description
	Albania	✓	January 1, 2021	In January 2020, Albania adopted the Law on Invoice and Turnover Monitoring System. The law progressively implements new e-invoicing requirements: (1) effective January 1, 2021 for taxpayers selling goods and services to public bodies (B2G); (2) effective July 1, 2021 for taxpayers selling to other businesses (B2B); and (3) effective September 1, 2021 for taxpayers selling to final consumers (B2C). 51 *For further details click here .
			July 1, 2021	
			September 1, 2021	
	Austria	✓	January 1, 2022	The Austrian tax authority announced that effective January 1, 2022, the standard XML invoicing format ebInterface versions 4.0, 4.1 and 4.2 will no longer be supported. After this date only ebInterface versions 4.3, 5.0, and 6.0 will be supported. The ebInterface is used in particular by the public administrations (federal government, state of Upper Austria, etc.) and selected companies (e.g. ÖBB) as the standard format for the introduction of structured e-invoices. 52
	*Belgium	●	N/A	In November 2021, Belgium released Policy Note of Finance for 2022, which proposes, among other things, a phased-in implementation of e-invoicing for B2B transactions. The format may be based on the Peppol standard, which is said to have been endorsed by government officials on multiple occasions. No timelines have been established to date. 53
		✓	2022	The government of the Wallonia region recently announced that e-invoices will be the preferred mode for B2G transactions effective January 1, 2022. Invoices sent via PDF or Word format will no longer be accepted. Taxpayers can send e-invoices through the Peppol network to the public entities or submit them manually via the Mercurius e-invoicing platform. All B2G invoices must have an invoice reference, a date, a VAT number, and a supplier's bank account number. Additionally, a Bank Identity Statement will be required to be included on the invoices if the bank account details of the issuer are not present in the new database of the Walloon region. In the Flanders region this obligation already applies for B2G transactions. 54

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7 Europe (continued)

✓ Enacted Legislation
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	Country	Status	Effective date	Brief description
	Bulgaria	●	TBD	The National Revenue Agency (“NRA”) is considering the introduction of mandatory e-invoicing. The NRA is consulting with industry stakeholders to draft the proposal. 55
	Cyprus	●	January 1, 2021	Cyprus recently launched a public consultation on a bill which would make e-invoicing mandatory for Public Procurement transactions effective January 1, 2022. 56
	Denmark	●	January 1, 2023	Denmark recently announced that effective January 2023 Peppol based e-catalogues and e-orders will be mandatory for public entities on certain categories of goods and services. 57
	*France	✓	January 1, 2023	France recently enacted the Finance Law for 2021, which clarifies the introduction of mandatory e-invoicing. The Finance Law for 2020 initially provided for the phasing in of mandatory e-invoicing between taxpayers. The requirement to provide e-invoices to businesses is combined with a requirement to transmit the e-invoice data to the French tax authorities as part of an e-reporting mechanism. 58
			January 1, 2023	The government was required to adopt an ordinance by September 1, 2021 regarding the use of electronic invoicing and the requirement to transmit the related information to the French tax authorities. 59 *For further details click here . *For further details click here . → Updates for France continue on next page.

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	Country	Status	Effective date	Brief description
	*France (continued)	✓	July 1, 2024	<p>On September 15, 2021, France published an ordinance, which postpones the implementation of the e-invoicing and e-reporting requirements from January 1, 2023 to July 1, 2024. The system will be a tax clearance model where e-invoice data is exchanged with the tax authorities. It will be supported by certified private agents who will first collect the data from taxpayers and then share it with the tax authority. The ordinance amends the timeline for the phased-in implementation of e-invoicing to now run between July 1, 2024 and January 1, 2026, depending on the size of the company. As such the new timeline is as follows: 60</p> <ul style="list-style-type: none"> July 1, 2024 for large companies, January 1, 2025 for small and medium-sized enterprises (SMEs) with a workforce of less than 5,000 people and annual sales of less than EUR 1.5 billion (\$1.7 billion) or a balance sheet total of less than EUR 2 billion (\$2.3 billion), and January 1, 2026 for SMEs and very small enterprises (VSEs) with fewer than 250 employees and annual sales of less than EUR 50 million (\$ 57 million) or a balance sheet total of less than EUR 43 million (\$49 million). <p>In addition, on September 30, 2021, France published an external specification document regarding the upcoming B2B e-invoicing and digital reporting mandate.</p>
			January 1, 2025	
			January 1, 2026	
	Germany	●	TBD	<p>On February 9, 2021, members of the German parliament called for an e-invoicing regime following the Italian e-invoicing model. 61</p> <p>→ Updates for Germany continue on next page.</p>

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	Country	Status	Effective date	Brief description
	*Germany (continued)	●	N/A	<p>According to news reports, Germany continues discussions regarding implementation of a Continuous Transaction Controls (CTC) system for e-invoicing in order to combat tax fraud and increase market competitiveness in Europe. The CTC is a form of transaction-based reporting or clearance either based on the actual invoice or on a subset of the invoice. Governments have increasingly implemented cloud-managed services to improve the efficiency, effectiveness, and quality of public services. CTCs enable law enforcement agencies, like tax administrations, to collect data associated with business activities that are relevant to the exercise of their function. This data is obtained directly from business data management systems, in real-time or near-real-time. 62</p> <p>Germany's new coalition government indicated in the coalition agreement that one of the aims for the future is to implement an e-invoicing system. 63</p>
		✓	August 9, 2021	Effective August 9, 2021, Germany approves the use of QR codes in order to shorten receipts. The information on the receipt can have a readable QR code that corresponds to the digital interface of the financial administration. 64
	Greece	✓	October 1, 2021	<p>The Greek tax authority recently announced that the mandatory reporting on e-books has been further postponed until October 1, 2021 (for entities maintaining either double entry books with gross receipts exceeding EUR 50,000 in 2019 or single-entry books with gross receipts exceeding EUR 100,000 in 2019); and, November 1, 2021 for all remaining entities with gross receipts below than the above thresholds. Beginning January 1, 2022, the myDATA mandate will extend to all revenue and expenses. All historical data from January 1, 2021 to October 31, 2021, must be transmitted to the myDATA platform by March 31, 2022. No fines are expected to be imposed for non-compliance with this obligation in relation to year 2021. The tax authority further provided clarification in the English myDATA guide on the operational aspects related to, amongst others, the applicable transmission methods (e.g., API documentation (v1.0.4)), the codification of specific types of transactions (e.g., imports/exports, intra-EU transactions, etc.) and the timing of the reporting of transactions. 65</p>
			January 1, 2022	

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	Country	Status	Effective date	Brief description
	*Hungary	✓	January 1, 2021	Certain reporting obligations under Hungary's electronic trade and transport control system ("EKAER") have been reduced beginning 2021. 66
			April 1, 2021	The online invoice system entered into effect January 1, 2021, but the tax authority granted a "grace period" until March 31, 2021 for businesses to comply with the new rules. As of April 1, 2021, only the 3.0 XSD schema will be allowed. 67 *For further details click here .
			June 30, 2021	The Ministry of Finance has extended the grace period applicable to the real-time reporting obligation related to certain self-billing invoices to June 30, 2021. 68 *For further details click here .
			November 12, 2021	The Hungarian government recently postponed the introduction of the "E-VAT" system through which the Hungarian tax authority prepares a "tentative" VAT return that taxpayers must review. The first e-VAT system return was intended to cover the reporting period starting on October 1, 2021. However, Government Decree 613/2021 (XI. 8.) delays the introduction of the e-VAT system until the end of the state of emergency (which currently lasts until the end of 2021). Thus, the first e-VAT system returns to be proposed by the tax authorities for taxpayers would be, at the earliest, in February 2022. According to preliminary plans, the preparation of VAT return proposals would be implemented in several steps. First, the VAT return proposals would be prepared based on data available from the online invoicing system. It is not yet known how the postponement of the e-VAT system could affect the implementation of further functions such as the inclusion of data related to import of products and providing return proposals for taxpayers that are obliged to submit EU sales and purchase lists or report reverse charge transactions, which initially were supposed to be gradually implemented throughout 2022. In addition, on November 23, 2021, Bill No. 17668 was submitted to the National Assembly. The bill, if approved, would repeal the implementation of the e-VAT system. 69 → Updates for Hungary continue on next page.

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	Country	Status	Effective date	Brief description
	*Hungary (continued)	●	2022	According to news reports, the National Tax and Customs Administration of Hungary is preparing to launch a pilot of the OECD's Standard Audit File for Tax (SAF-T). The start date of the pilot will likely be delayed until 2022 given the ongoing impact of COVID-19. 70
	Ireland	●	N/A	On May 31, 2021, the Irish Office of Government Procurement clarified that there is no requirement on suppliers in Ireland to send e-invoices to Irish public bodies. However, public bodies need to be able to receive and process e-invoices via the Peppol network should a supplier wish to send an e-invoice in such a manner. 71
	*Italy	✓	January 1, 2021	Effective January 1, 2021, Italy introduced new mandatory e-invoicing requirements for retailers. Certain technical processes under the e-invoicing rules concern new technical specifications for e-invoicing via the <i>Sistema di Interscambio</i> (SdI) and amendments to the "document type" and "nature" codes for the XML file. 72 *For further details click here .
			October 1, 2021	On May 26, 2021, the governments of Italy and San Marino agreed to introduce in two phases e-invoicing for transactions between the two countries. The first phase will be voluntarily effective October 1, 2021. The second phase will require the mandatory issuance of e-invoices effective July 1, 2022. 73
			July 1, 2022	
			July 7, 2021	On July 7, 2021, the Italian tax authority (<i>Agenzia delle Entrate</i>) published an updated e-invoicing (<i>fatture elettroniche</i>) guide and related technical specifications. The updated guide includes new validations and codes, which have been introduced under the "non mandatory" fields. 74 → Updates for Italy continue on next page.

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	Country	Status	Effective date	Brief description
	*Italy (continued)		December 31, 2021	On November 3, 2021, Italy published Protocol No. 298662/2021, which postpones the deadline for qualifying taxpayers and their representatives to join the ITA's online service through which they may examine and download issued and received electronic invoices from September 30, 2021 to December 31, 2021. 75
		✓	January 1, 2022	<p>On December 3, 2021, the Italian Senate approved Tax Work Decree (linked to Budget Law 2022 DL 146/2021), which proposes, among other things, to postpone the abolishment of the current <i>Esterometro</i> report from January 1, 2022 to July 1, 2022. It is anticipated that the measure will be approved by December 20, 2021.</p> <p>To replace the <i>Esterometro</i> report, Italy will extend the <i>Sistema Di Interscambio</i> (SdI) e-invoicing system to cross-border transactions conducted by entities established in Italy with non-Italian customers or vendors. Taxpayers in Italy will have to issue e-invoices through the SdI system for the following transactions: 76</p> <ul style="list-style-type: none"> — Accounts Receivable transactions performed with non-established customers within the deadline for the issuance of the invoice (i.e., 12th day following the taxable event) — Accounts Payable transactions performed with non-established vendors by the 15th day of the month following the month when the invoice was received or the taxable event occurred
		●	December 31, 2024	On December 3, 2021, the European Commission submitted a proposal for a Council Implementing Decision authorizing Italy to extend until December 31, 2024 its derogation from the EU VAT Directive with respect to its e-invoicing system. The proposal would further authorize Italy to expand the e-invoicing requirement to taxpayers who benefit from the exemption for small enterprises. 77 → <i>Updates for Italy continue on next page.</i>

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	Country	Status	Effective date	Brief description
	*Italy (continued)	●	September 13, 2021	On September 13, 2021, Italy launched a pilot program for pre-filling VAT returns, which enables companies to view their quarterly VAT returns on the Italian tax authority portal. The VAT returns are pre-filled based on e-invoicing data gathered beginning July 1, 2021. The Italian tax authority plans to provide complete annual returns starting 2023 based on e-invoicing data gathered during 2022. 78
		✓	January 1, 2022	The Italian Digitalization Agency (AGID) recently published guidelines regarding the creation and storage of electronic documents, including e-invoices, effective January 1, 2022 (originally June 7, 2021). The guidelines include a suggested structure for storage of mandatory metadata elements, new metadata elements, and updates to description fields for metadata. 79
	Latvia	●	January 1, 2025	On October 12, 2021, Latvia announced that it plans to start requiring e-invoicing in accordance with the PEPPOL standard effective 2025 for B2B and B2G transactions. The requirement is intended to ensure convenient and uniform preparation and storage of documents, enabling a faster and more secure flow of information between taxpayers, as well as simultaneous transfer of data to the tax authority. 80
		✓	September 2, 2021	Latvia recently launched a free mobile application to record and store checks, receipts, and other payment documents, which will be available through the tax authority's Electronic Declaration System (EDS) when filing the Annual Income Declaration for the following accounting period and can easily be attached to the declaration. 81

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	Country	Status	Effective date	Brief description
	Netherlands	●	N/A	The Ministry of the Interior and Kingdom Relations (BZK) recently conducted a public consultation on the incorporation of a national standard for the exchange of e-orders via the Peppol BIS3. Based on the responses published, the public's inclination would be not to implement a national standard. 82
		●	2022	<p>The Dutch tax authority has written to VAT-registered taxpayers to inform them of the obligation to authenticate their identity using the "eHerkenning" system effective 2022.</p> <p>VAT filings are being ported to the "Mijn Belastingdienst Zakelijk" platform. That platform will require that businesses provide a eHerkenning identity key (an "eHerkenningmiddel"), which must be purchased from a recognized service provider, in order for a firm to then file its VAT return.</p> <p>Alternatively, an agent may be used, bypassing the requirement, or the company may file using compatible software. Sole traders will be exempt from the requirement and may continue to use DigiD. 83</p>
		✓	January 1, 2022	<p>Effective 2022, the Netherlands will replace the current tax portal with a new portal called Mijn Belastingdienst Zakelijk portal. As a consequence, taxpayers will be required to file returns using compatible software, through a tax services provider, or through the new portal. With the adoption of the new portal, VAT-registered taxpayers must authenticate their identity using the eHerkenning system. However sole traders are exempt from this identity requirement and may continue to use DigiD.</p> <p>The following returns must be filed using the new portal: 84</p> <ul style="list-style-type: none"> — First monthly return, covering January, due February 2022 — First quarter return, due April 2022 — First annual declaration, due January 2023

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	Country	Status	Effective date	Brief description
	Norway	✓	January 1, 2022	Effective January 1, 2022, Norway will implement a new VAT return, which will be based on standard SAF-T codes. In addition, taxpayers will be able to file the returns directly from their enterprise resource planning (ERP) systems.
			2024	Norway further recently proposed to require taxpayers to file sales and purchase reports by 2024. 85
	*Poland	●	October 1, 2021	The Polish Ministry of Finance has proposed an initial draft for the implementation of e-invoicing. The proposed law establishes a two phased approach: a voluntary e-invoice period starting later this year (October 2021) and a second mandatory phase starting in 2023. 86 In addition, the government has launched a public consultation for the implementation of B2B e-invoicing via the National Electronic Invoicing System (KSeF). The effective date of implementation is currently planned for 2023. 87
			✓	July 1, 2021
				January 2022

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	Country	Status	Effective date	Brief description
	*Poland (continued)	✓	January 1, 2022	On October 29, 2021, Poland passed a law implementing a National System of e-invoicing (KSeF) in Poland. E-invoicing will be voluntary beginning 2022 and mandatory in January 2023. However, in the future e-invoicing will become obligatory (most likely as of the second quarter of 2023, provided the respective derogation by the Council of the EU is granted). According to the law, taxpayers will be able to issue structured invoices through an individual account in the Polish KSeF system, which is operated by the Ministry of Finance. The e-invoices would then be sent to recipients via an interface enabling the connection and exchange of data between IT systems. The e-invoicing mechanism will be first optional in 2022 and taxpayers opting for an early adoption will benefit of certain advantages such as a reduced standard VAT refund period. Effective January 1, 2023, the e-invoicing system will become mandatory. 89
			January 1, 2023	
			January 1, 2022	The Ministry of Finance recently announced that beginning January 1, 2022, the JPK Gateway cannot be used to submit JPK, CUK, and ALK files signed with a qualified signature using the SHA-1 algorithm. Instead, only files signed via SHA-256 can be sent through the JPK Gateway. 90
			January 1, 2023	On October 29, 2021, the Lower House of Parliament (Sejm) passed an amendment that would postpone to January 1, 2023, the deadline to keep records and other documentation regarding excise tax and stamp tax in an electronic form. 91
			August 12, 2021	On August 12, 2021 the Polish Ministry of Finance published guidance regarding the qualification for repayment of up to 90 percent of the costs incurred to acquire virtual cash registers linked to the tax authority. According to the guidance, the reimbursement is only be given to entities that are entitled to use virtual cash registers (i.e., doing business in one of following sectors: transport, hotel and accommodation, restaurant and catering, coal selling companies). 92

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	Country	Status	Effective date	Brief description
	Portugal	✓	July 1, 2021	Portugal postponed the deadline for non-resident entities registered for VAT purposes to issue invoices through a certified invoicing software from January 1, 2021 to July 1, 2021. 93 *For further details click here .
			January 1, 2022	The Secretary of State for Tax (“Secretário de Estado Adjunto e dos Assuntos Fiscais”) recently issued order 412/2020 postponing the deadline for requiring certain tax documents to list the document’s unique code (ATCUD) to January 1, 2022. 94 *For further details click here .
			2022	Pursuant to the State Budget Law 2021, the obligation to file the “IES/DA” (i.e., the annual simplified business information return) prior submission of the accounting SAF-T file has been postponed to 2022. 95
			October 1, 2021	On April 22, 2021, the Portuguese Government published Dispatch no. 133/2021-XXII, which includes new deadline extensions for the fulfillment of several tax obligations, including an extension to September 30, 2021 to accept PDF invoices. Effective October 1, 2021 all non-EDI invoices require a "Qualified Electronic Signature" (QES). 96
			January 1, 2022	Portugal recently delayed the mandatory B2G e-invoicing requirements until January 1, 2022, including requirement that e-invoices in PDF format must include digital signatures for validity. 97
			2023	On November 10, 2021 the Secretary of State for Tax Affairs issued Despacho 351/2021.XXII. The order includes the following key items: 98 , 99 <ul style="list-style-type: none"> — The requirements to include an ATCUD (unique invoice ID) has been suspended in 2022 and will become mandatory in 2023. — The VAT return filing deadline for returns due in the first semester have been changed to the 20th day of the month after the relevant tax period.
			June 30, 2022	<ul style="list-style-type: none"> — All invoices will continue to be accepted in PDF format until June 30, 2022.

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	Country	Status	Effective date	Brief description
	*Romania	✓	August 2021	The Tax Collection Agency of Romania (“ANAF”) announced their intention to implement SAF-T reporting later this year. The government is currently hosting consultation sessions with different stakeholders to analyze proposals related to the SAF-T technical requirements. 100
			January 2022	
			January 1, 2022	The Romanian tax authority (“ANAF”) recently issued the preliminary SAF-T structure, which taxpayers can adopt voluntarily effective August 2021. It is expected that January 2022 will be the first reporting month for which large taxpayers will need to comply with the new reporting requirements. 101
			November 1, 2021	Romania recently published rules on the administration, operation, and implementation of the national system on electronic invoicing, RO e-Factura, and the implementation of a formal e-invoicing mechanism. These rules clarify the functioning of the RO e-Factura system itself, the structure of e-invoices, registration requirements, and the application of e-invoicing in B2G and B2B transactions. Taxpayers that opt to utilize the RO e-Factura system for B2G transactions must do so for all B2G transactions (with the exception of contracts excluded by legislation). Taxpayers that opt to use the RO e-Factura system for B2B transactions must register in the e-invoice register. For B2B transactions, the RO e-Factura system may only be used if both the issuer of the invoice and the recipient are listed in the RO e-Factura system. Nonresidents may also opt to use the RO e-Factura system in B2G and B2B relationships. Further, the structure of the e-invoice is in accordance with the European standard for electronic invoicing, EN 16931. 102 → Updates for Romania continue on next page.

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	Country	Status	Effective date	Brief description
	*Romania (continued)	●	January 1, 2022 for large taxpayers	<p>On November 9, 2021, the National Tax Authority of Romania (ANAF) published Order no. 1783/04.11.2021 regarding the implementation of the Standard Audit File for Tax (SAF-T) system.</p> <p>Effective January 1, 2022, then ANAF will gradually require taxpayers to file Informative Statement D406 (SAF-T) as follows: 103</p>
			July 1, 2022 for taxpayers classified as large taxpayers beginning January 1, 2022	<ul style="list-style-type: none"> — For large taxpayers: January 1, 2022; — For taxpayers classified as large taxpayers beginning January 1, 2022: July 1, 2022; — For medium taxpayers: January 1, 2023; — For small taxpayers: January 1, 2025; and — For newly registered taxpayers: from the effective date of registration.
			January 1, 2023 for medium taxpayers	<p>Business will be required to submit Informative Statement D406 according to the following deadlines:</p> <ul style="list-style-type: none"> — For fixed assets, no later than the deadline for submitting the financial statements for the financial year; — For inventory, by the deadline established by the ANAF, which may not be less than 30 calendar days from the date of the request; and — For information other than inventory and fixed assets, no later than the last calendar day of the month following the reporting period (calendar month/quarter, as appropriate).
			January 1, 2025 for small taxpayers	

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	Country	Status	Effective date	Brief description
	Russia	✓	July 1, 2021	On November 9, 2020, the President of the Russian Federation signed Federal Law No. 371-FZ, which introduces changes connected to the national system enabling the tracing of goods. As a consequence, companies should switch to electronic document flows, at least for issuing and receiving electronic VAT Invoices. The new rules are effective July 1, 2021. 104 *For further details click here .
		●	September 11, 2021	The Ministry of Justice of Russia recently published Version 5.0.2 of the traceability documents which will be accepted beginning September 11, 2021. Traceability documents are submitted to tax authorities in order to trace imported goods. 105
	Serbia	✓	January 1, 2022	On April 29, 2021, Serbia published the Law on Electronic Invoicing. The framework is based on the clearance model i.e. transmission and validation of e-invoices through a government portal. The framework is based on REST API which offers various methods to communicate with the government. The e-invoices must be issued in an XML format based on the UBL 2.1 standard and must contain specific codes indicating the type of invoices and VAT categories. The implementation of e-invoicing is as follows: 106 1. For public bodies: — Effective January 1, 2022, for the issuance of e-invoices to other public bodies, the receipt and storage of e-invoices, and the electronic recordkeeping of the VAT calculation in the e-invoice system. — Effective July 1, 2022, for the issuance of e-invoices to private sector entities. 2. For private sector entities: — Effective January 1, 2022, for the issuance of e-invoices to public bodies. — Effective July 1, 2022, for the receipt and storage of e-invoices. — Effective January 1, 2023, for the issuance of e-invoices to private sector entities. → Updates for Serbia continue on next page.
			July 1, 2022	
			January 1, 2023	

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	Country	Status	Effective date	Brief description
	Serbia (continued)	✓	January 1, 2022	On July 9, 2021, Serbia published the following regarding the new e-invoicing obligations including: (1) a rulebook on e-invoice elements, (2) a rulebook on the registration to access the e-invoicing system, (3) a decree on the conditions and manner of using the invoicing management system; (4) a rulebook on the manner of acting of the Central Information Intermediary; (5) a decree on the procedure and conditions for issuing and revoking consent for performing the activities of an information intermediary; and (6) a decree on the conditions and manner of keeping and making available e-invoices and the manner of ensuring the authenticity and integrity of the contents of invoices in paper form. The rulebooks and decrees are effective January 1, 2022. 107
	Slovakia	●	TBD	The Ministry of Finance has proposed legislation that establishes a pre-clearance system on e-invoices. If approved, business-to-business e-invoices will require governmental approval. In addition, customers will be required to report their purchases reconciling them with the original sales invoice. 108
		●	January 1, 2022	<p>The Slovak Ministry of Finance (MoF) is continuing with the e-invoicing initiative, informačný systém elektronickej fakturácie. The proposed e-invoicing system would support both the issuance and receipt of e-invoices for domestic transactions and help foreign suppliers to create structured invoices which can be sent via an e-mail. The system would use UBL 2.1 along with an XML format and is aimed to reduce compliance burden and increase transparency.</p> <p>The MoF further launched a new website containing information regarding the e-invoicing initiative as well as a demo system which is open to all for testing and improvement before the live implementation.</p> <p>The planned timeline for the implementation is as follows: 109</p> <ul style="list-style-type: none"> — August 2021, public may use a demo account for testing — January 2022, e-invoicing system utilized for B2G, G2G, and G2B transactions — January 2023, e-invoicing system utilized for B2B and B2C transactions

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7 Europe (continued)

✓ Enacted Legislation
● Proposed Legislation
● Pilot Program
● Projected Updates
● Announcement
✗ Revoked Legislation

	Country	Status	Effective date	Brief description
	Slovenia	✗	N/A	The Ministry of Finance of Slovenia has recently withdrawn a draft regulation, which proposed to introduce a mandatory B2B e-invoicing system. 110
		✓	October 1, 2021	Effective October 1, 2021, all importers must use the new Slovenian automated import system (SIAIS2) for central filing and declaration of shipments. 111
	*Spain	✓	January 4, 2021	The tax authority implemented amendments to the VAT Immediate Information system (SII). The main changes concern the issuance of two detailed reports: the first one consists on reporting all invoices from suppliers; and the second one is to report consignment sales. 112
		●	N/A	<p>On November 30, 2021, the Council of Ministers approved a proposal for a law, which would implement the use of e-invoices in B2B transactions in two phases. According to the Spanish legislative procedure the proposal must be passed by Parliament and Senate before it can be enacted as a law. 113</p> <ul style="list-style-type: none"> Phase 1 for large companies issuing invoices with total amounts over EUR 8 million (i.e., annual turnover for invoices issued) within 1 year after the law is approved by parliament; and Phase 2 for all other companies within 3 years after the law is approved by parliament. <p>According to the proposal, businesses would be expected to exchange to e-invoices, as well as store and maintain access to e-invoices for 4 years. The Spanish government also intends to create a "National Debt Observatory" that would monitor and analyze payment transactions and promote good practices.</p> <p>In addition, the Spanish government has started a Digital Toolkit program to provide financial support to businesses to adopt the necessary technologies to implement an e-invoice system.</p> <p>→ Updates for Spain continue on next page.</p>

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7 Europe (continued)

✓ Enacted Legislation
● Proposed Legislation
● Pilot Program
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● Announcement
✗ Revoked Legislation

	Country	Status	Effective date	Brief description
	*Spain (continued)	✓	January 1, 2022	<p>The provincial council of Biscay initially planned to implement the 'BATUZ Strategy' effective January 1, 2022, which consisted of the following: 114</p> <ul style="list-style-type: none"> a) Implementation of "TicketBAI" e-invoicing system; b) Book registry (LROE) for individuals and legal entities correspondingly; and c) Prefilled templates of VAT and Income tax returns.
			January 1, 2024	<p>Effective January 1, 2024, taxpayers are required to declare the Economic Operations Record Books (LROE) electronically in the province of Biscay.</p> <p>Taxpayers must file the LROE using the new TicketBAI system by the 25th day of the end of each trimester before settling VAT payment. Large companies included in a group of entities and selected taxpayers must file the LROE monthly. 115</p>
	United Kingdom	●	April 1, 2022	<p>Effective April 1, 2022, small businesses (including self-employed and landlords) will be required to maintain records digitally and provide VAT returns through Making Tax Digital compatible software. 116</p>

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	Country	Status	Effective date	Brief description
	*Australia		July 1, 2022	The government of Australia recently announced that Australia will mandate e-invoicing for all government agencies by July 1, 2022, with over 80 percent of invoices being able to be received electronically by July 1, 2021. The government will further consult on options for the mandatory adoption of e-invoicing across all levels of government and by businesses. In Australia, the common e-invoicing standard is Peppol, which is an internationally established standard. 117 *For further details click here . * For KPMG Consultation Paper click here .
			July 1, 2022	Australia is targeting July 2022 for the mandatory implementation of e-invoicing for B2G transactions. 118
			August 30, 2021	New South Wales government launches Supplier Hub Invoicing Portal, a one-stop source for all information on e-invoicing to support suppliers in the submission and review of e-invoices. The intent is to reduce costs, time, manual errors, and paper filing. The portal allows suppliers to register to sell with NSW government, update, and share their procurement-based information. 119
	*China		September 30, 2020	China continues with a nationwide rollout of e-invoicing, which initially began in September 2020 with a pilot in the regions of Ningbo, Shijiazhuang and Hangzhou; a month later the pilot soon expanded to 11 additional regions, and as of January 21, 2021 larger regions as Beijing, Inner Mongolia, Guangxi among others have joined the pilot program. 120 *For further details click here .
			December 1, 2021	On November 30, 2021, the tax authorities from Shanghai, Guangdong, and Inner Mongolia announced the introduction of a comprehensive pilot program pursuing e-invoicing among selected taxpayers in Shanghai, Guangzhou, Foshan, Guangdong-Macao Intensive Cooperation Zone, and Hohhot will be implemented effective December 1, 2021. The announcements have made significant changes to existing e-invoicing rules and have also revealed the development trend in this area. 121

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Asia – Pacific (continued)



	Country	Status	Effective date	Brief description
	*India	✓	April 1, 2021	Following the implementation of e-invoicing in October 2020, effective April 1, 2021, taxpayers with gross receipts in excess of INR 50 crore (\$690,000) are required to issue e-invoices for all business-to-business sales, including exports. 122 * Read the March 2021 Report prepared by KPMG India.
		●	June 1, 2021	On June 1, 2021, the Central Board of Indirect Taxes and Customs issued Notification No. 23/2021 - Central Tax, which clarifies that the e-invoicing system does not apply to a government department and local authority. 123
		✓	June 30, 2021	On June 30, 2021, the Central Board of Indirect Taxes and Customs issued Notification No. 28/2021 - Central Tax, which supersedes Notification No. 89/2020 - Central Tax, waiving the penalty for non-compliance with the requirement to include QR codes on B2C invoices between December 1, 2020 to September 30, 2021. 124
		●	N/A	The Indian Central Board of Indirect Taxes and Customs recently announced that physical invoices do not need to be carried during the movement of goods when an e-invoice has been issued provided that the Invoice Reference Number (IRN) imbedded in the Quick Response (QR) Code can be produced for verification by the tax authority. 125
	Japan	●	October 2023	Japan is planning to roll-out a national e-invoicing framework based on the Peppol standards. While precise details of the initiative are still in progress, it is expected that the E-invoicing Promotion Association (EIPA) will make the specifications available by the end of June 2021. 126
		●	September 1, 2021	On September 1, 2021, Japan established a Peppol authority, the Digital Agency, which plans to provide an improved user-experience and services for ministries, agencies, laws, systems, and users. 127 → Updates for Japan continue on next page.

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Asia – Pacific (continued)

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	Country	Status	Effective date	Brief description
	Japan (continued)	✓	January 1, 2022	On November 12, 2021, the National Tax Agency of Japan posted a set of “frequently asked questions” (FAQs) as guidance regarding the amendments to the electronic preservation system for account books under the 2021 tax reform. The FAQs address the rules for: (1) preservation systems for national tax-related account books and documents by electromagnetic record, (2) scanner preservation systems for national tax-related documents, (3) preservation systems for electromagnetic records related to transaction information of electronic transactions. Under the 2021 tax reform, taxpayers must preserve electronically (i.e. on electromagnetic records) data as hard copy preservation will be prohibited effective January 1, 2022. However, this effective date can be extended for 2 years upon request. 128
	Kazakhstan	●	July 4, 2021	<p>On July 4, 2021, Kazakhstan launched a pilot project that exempts non-VAT registered taxpayers from the electronic VAT invoicing requirement for transactions exceeding 1,000 times the monthly index factor in 2021.</p> <p>Effective January 1, 2022 Kazakhstan will no longer require e-invoices to be issued when sales of specific goods are made to the following unregistered taxpayers: 129</p> <ul style="list-style-type: none"> — Individuals who use the purchased goods for personal, family, home or other use that is not related to entrepreneurial activity (i.e. final consumption); and — Individuals or legal entities that are classified as micro-entrepreneurships in accordance with the Entrepreneurial Code of the Republic of Kazakhstan. <p>The specific goods for which e-invoicing is not required are:</p> <ul style="list-style-type: none"> — Goods included in the Withdrawal List. This list pertains to goods imported into Kazakhstan from jurisdictions that are not members of the Eurasian Economic Union, which are subject to reduced duty rates per the Harmonized Schedule (HS) codes assigned; — Imported goods; and — Goods that have entered the "Virtual Warehouse" (e-invoicing module used to track the movement of goods).

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Asia – Pacific (continued)

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	Country	Status	Effective date	Brief description
	New Zealand		TBD	The government of New Zealand continues with its e-invoicing implementation project and has published guidelines for small, medium, and large businesses. The current system is voluntary and no official date of a mandatory e-invoicing system has yet been published. 130
			July 8, 2021	On July 8, 2021, the Ministry of Business, Innovation & Employment (MBIE) announced it recently completed the procurement process to secure an e-invoicing open syndicated agreement with a panel of access point providers for all of government to use. The agreement covers the provision of e-invoicing capabilities and associated services based on the global PEPPOL standard. 131
			March 2022	Effective March 2022, New Zealand requires that central government agencies should have the capability to receive e-invoices. The central government agencies are also working towards a target where 90 percent of B2G transactions are e-invoices by July 2026. New Zealand further encourages wider government agencies to adopt and use e-invoicing, though this is not mandatory at this stage. There is also no mandate for businesses to adopt e-invoicing. 132
	Philippines		TBD – 2021	The Philippines is currently going through a business process review and design phase for the implementation of an Electronic Invoicing System (EIS). Effective January 1, 2022, a pilot program covering 100 taxpayers will be implemented. A plan of expanding the pilot is in place to possibly include targeted taxpayers. 133
			September 15, 2021	The Philippines House of Representatives proposed the use of a single e-invoicing document in order to ease the e-invoicing process, reduce processing time and government intervention, and increase tax compliance. The proposal was included as amendments to the Ease of Paying Taxes Act. In addition, by 2022 one hundred select taxpayers will be required to use the e-invoicing system. 134

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Asia – Pacific (continued)



	Country	Status	Effective date	Brief description
	South Korea		N/A	On September 13, 2021, South Korea initiated the process to join the Digital Economy Partnership Agreement (DEPA), a trade agreement between New Zealand, Chile, and Singapore. According to DEPA, members agree to recognize digital identity documents, timely paperless exchange of customs documents, adopt interchangeable e-invoicing standards, and agree to a pro-FinTech philosophy. 135
	Sri Lanka		October 18, 2021	On October 18, 2021, the Inland Revenue Department of Sri Lanka (IRD) issued a notice to taxpayers, which provides instructions to obtain Personal Identification Number (PIN) and Special Staff Identity Number (SSID) required for companies, partnerships, and individuals when filing income tax returns for the tax years 2020 and 2021. In addition, for tax year 2021 all corporate income tax returns will need to be filed via the e-services system. 136
	Taiwan		January 1, 2021	Effective January 1, 2021, taxpayers should comply with Taiwan's mandatory use of uniform invoices (e-GUI). Taiwan's authorities have provided guidance to taxpayers during the transition period since 2017. 137
	Thailand		October 6, 2021	The Revenue Department of Thailand recently upgraded the electronic tax filing and payment service to enable taxpayers to connect directly to the department and other agencies, in an effort to increase efficiency and ease the process of tax filing. For example, taxpayers who submit returns via the e-monitoring system of the Board of Investment can allow the system to automatically link the annual tax return information with the Revenue Department. 138
	Vietnam		July 1, 2022	Vietnam postponed the implementation of e-invoicing from November 1, 2020 to July 1, 2022. 139 *Read the 2020 report prepared by the KPMG member firm in Vietnam. → <i>Updates for Vietnam continue on next page.</i>

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Asia – Pacific (continued)

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	Country	Status	Effective date	Brief description
	Vietnam (continued)	✓	N/A	<p>On September 17, 2021, the Ministry of Finance of Vietnam issued Circular No. 78/2021/TT-BTC, which, among other things, provides implementation rules for e-invoicing, which will become mandatory for most businesses effective July 1, 2022. Circular No. 78 details the contents of e-invoices, including: authorization to issue e-invoices; sample of various types of e-invoices; symbol of e-invoice types; use of e-invoices with the verification code of the tax authorities; use of e-invoices in other typical cases; e-invoices with the verification code of the tax authorities which are generated from the cash register with an electronic data transfer connection to the tax authority's system; criteria to select an e-invoice service provider.</p> <p>In addition, the Circular also stipulates content requirements for paper-based invoices, including: 140</p> <ul style="list-style-type: none"> — types of invoices, symbol of invoice types, invoice symbol, name of invoice copy printed by the tax authorities; — the use of receipts for collection of taxes, fees and charges by tax authorities for individuals; and — Transitional period guidelines.

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	Country	Status	Effective date	Brief description
	*Egypt	✓	May 15, 2021	Egypt's Minister of Finance announced that taxpayers registered at the Large Taxpayer Center have until May 15, 2021 to join the electronic invoice (e-invoice) system. The first phase of the e-invoicing rollout timeline began on November 15, 2020, the second phase began on February 15, 2021, the third phase is to be launched on May 15, 2021, and a the fourth phase is expected to be launched to all taxpayers on July 1, 2021.
			August 12, 2021	On August 12, 2021, the Egyptian tax authority announced the launch of the Egyptian invoicing mobile application, which enables users to issue, view and submit digitally signed invoices to the ETA. 141
			December 15, 2021	Effective September 15, 2021, all companies selling goods and services online with an annual revenue up to EGP 500,000 and companies registered with the Senior Taxpayers Center are required to join the e-invoice system. Failure to adopt e-invoicing will result in (1) fines ranging EGP 20,000 and EGP 100,000, (2) imprisonment for 3 to 5 years for non-compliance, and (3) removal from the center of major financiers, which includes removal from the export support program and inability to engage with government agencies. Effective December 15, 2021, joint-stock companies and investment companies in Cairo are also required to join the e-invoice system. The Egyptian Ministry of Finance further announced an electronic receipts pilot for B2C transactions where 100 companies have signed up as part of a six-month trial where all transactions will be recorded in a real time system. Moreover, the government plans to extend the e-invoicing obligation for B2B transactions from April 1, 2023. 142
			January 1, 2022	Effective January 1, 2022, Egypt will no longer accept paper invoices to process VAT refunds and deductions. 143

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	Country	Status	Effective date	Brief description
	Israel		TBD	The tax authority of Israel is planning for the introduction of a mandatory e-invoicing system for invoices above NIS 5,000, which would need to obtain immediate online approval from the tax authority when the transaction takes place. Taxpayers would not be able to deduct VAT from invoices that have not been approved by The Tax Authority. 144
	Jordan		TBD	Jordan issued RFP No 1F2019 soliciting proposals from qualified bidders to assist on the design and implementation of its National e-invoicing solution. 145
	Kenya		August 1, 2022	Effective August 1, 2021, Kenya implemented the Value Added Tax (Electronic Tax Invoice) Regulations, 2020, which provides businesses with up to 12 months to comply with the requirement to issue e-invoices to customers and transmit transaction data to the tax authority. Kenyan businesses will be required to issue e-invoices through an electronic tax register, linked with the tax agency, from August 1, 2022. 146
	Nigeria		TBD	On April 1, 2021, the Federal Inland Revenue Service of Nigeria of Nigeria (FIRS) issued a Public Notice announcing that it intends to connect its automated tax administration system to systems of relevant taxpayers in order to have access, for tax purposes, to relevant records, data or information stored in computers or other electronic devices (including cloud computing facilities) maintained, operated, controlled or owned by those taxpayers or their agents. The connection shall include relevant point of sales or invoicing platforms of all taxpayers (individuals, enterprises, companies and entities). Additionally, relevant persons are required to grant the FIRS access to all computers, electronic devices or cloud computing facilities where records, data or information are stored. 147 For further details click here .
			June 7, 2021	The Nigerian Federal Inland Revenue Service (FIRS) recently launched a new electronic tax portal (TaxPro-Max). The new portal enables registration, filing and payment of taxes, as well as automatic credit of withholding taxes among other features. For taxpayers unable to file electronically, they can file in person. 148

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	Country	Status	Effective date	Brief description
	Oman	✓	July 1, 2021	Effective July 1, 2021, the tax authority of Oman began receiving VAT returns electronically. 149
	Rwanda	●	May 14, 2021	On May 14, 2021, the Rwanda Revenue Authority (RRA) published an announcement regarding available Electronic Invoicing Systems (EBM) for all taxpayers (whether registered on Value Added Tax or not). To this effect, taxpayers are required to apply for one of the following electronic invoicing systems: 150 a) EBM Software b) EBM Mobile System c) Online EBM Solution d) Online Sales Data Controller e) Virtual Sales Data Controller
		●	N/A	On August 18, 2021, the RRA published a new version of the "Electronic Billing Machine," which refers to various methods of printing RRA certified invoices and sending sales data to the RRA in real-time. The RRA has not yet mandated the use of EBM V2.1. 151
	*Saudi Arabia	✓	December 4, 2021	The Zakat, Tax and Customs Authority (ZATCA) issued regulations concerning the implementation of e-invoicing effective December 4, 2021. On March 18, 2021, the ZATCA published draft provisions on controls, requirements, technical specifications and procedural rules for e-invoicing. Interested parties have until April 17, 2021 to submit their comments. 152 *For further details click here . → Updates for Saudi Arabia continue on next page.



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	Country	Status	Effective date	Brief description
	*Saudi Arabia (continued)	✓	December 4, 2021	On May 28, 2021, the ZATCA published guidelines and standards for the implementation of the e-invoicing system ("FATOORAH"). The new guidelines have postponed the phase two of the e-invoicing system from July 1, 2022 to January 1, 2023. The effective date of phase 1 of the e-invoicing implementation remains December 4, 2021.
			January 1, 2023	a) Phase 1: requires taxpayers to issue and store electronic invoices and notes b) Phase 2: requires taxpayers to transmit e-invoices and notes, and submit these documents to the tax administration for validation and stamping. 153 For further details click here .
			December 4, 2021	On November 18, 2021, the ZATCA published the "Guide to Developed FATOORA Compliant QR Code," which clarifies the implementation of QR codes on B2C simplified tax e-invoices for Phase 1 (Generation Phase) of Saudi Arabia's implementation of e-invoicing. The minimum requirements that must be included in the QR code in Base64 Tax-Length-Value (TLV) format are:(1) the seller's name, (2) the VAT registration number of the seller, (3) the time stamp of the invoice (date and time), (4) the invoice total amount (including VAT), and (5) the total VAT amount. 154
			December 4, 2021	The ZATCA recently published English translations of several guidelines including the "E-invoicing Detailed Guidelines," which contain information regarding technical and security requirements, data dictionary, and security specifications for e-invoicing, and the "Simplified Guidelines For E-invoicing Phase 1," which contain the requirements to issue, amend, and save invoices electronically 155 → <i>Updates for Saudi Arabia continue on next page.</i>

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	Country	Status	Effective date	Brief description
	*Saudi Arabia (continued)	✓	December 18, 2021	<p>On November 16, 2021, the ZATCA announced the fines and penalties that will be imposed for non-compliance with the new e-invoicing rules starting two weeks from the effective date of the e-invoicing mandate. The fines levied will depend on the type of violation and the number of times the violation has occurred, as follows: 156</p> <ul style="list-style-type: none"> — Non-issuance and/or failure to archive e-invoices: between SAR 5,000 and SAR 50,000; — Failure to include the QR Code in simplified tax invoices (B2C): initially, a warning will be issued to the taxpayer; subsequently the maximum penalty can be up to SAR 50,000; — Failure to inform ZATCA of any malfunction that hinders the issuance of e-invoices: initially, a warning will be issued to the taxpayer; subsequently the maximum penalty can be up to SAR 50,000; — Failure to include the purchaser's VAT registration number on e-invoices (when required to be included): initially, a warning will be issued to the taxpayer; subsequently the maximum penalty can be up to SAR 50,000; and — Deletion or amendment of e-invoices after their issuance (other than by credit/debit note): between SAR 10,000 and SAR 50,000.
			December 4, 2021	The ZATCA recently proposed amendments to the VAT implementing regulations to include new e-invoicing regulations, which were approved on November 9, 2021. The amendments relate to Article 53 for Tax Invoices, Article 54 for Credit and Debit Notes, and Article 66 for Records of the VAT Implementing Regulations. 157
	Syria	●	TBD	According to news reports, Syria will implement a new verification of e-invoices, first in the tourism sector followed by supply chains in general. Vendors will register their invoices, which can then be verified by purchasers online. 158
	Turkey	✓	July 1, 2021	<p>The Turkish Revenue Administration (GIB), issued an announcement (Communique No, 526) which establishes mandatory issuance of e-invoices (e-Fatura and e-Arşiv) for all taxpayers of the healthcare sector effective July 1, 2021. 159</p> <p>→ Updates for Turkey continue on next page.</p>

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	Country	Status	Effective date	Brief description
	Turkey (continued)	✓	2022	<p>The GIB recently expanded the scope of e-documents which are now to be used to record expenses, bank receipts, foreign exchange receipts, etc. The intention is to save time, reduce costs, and increase productivity.</p> <p>In addition, draft Tax Procedural Code General Communiqué No: 509 was published on November 10, 2019, which, among other things, would require certain taxpayers to comply with e-invoicing including: 160</p> <ul style="list-style-type: none"> — Taxpayers with gross sales revenue of TRY 5 million and above for 2018/2019/2020, TRY 4 million and above for 2021, TRY 3 million and above for 2022 and subsequent years; — Online advertising service intermediaries; — Taxpayers who sell goods and services through websites, intermediary websites, or in any other electronic environment; who generates gross sales revenue over TRY 1 million for 2020 and 2021, and TRY 500,000 for 2022
	*Uganda	✓	January 1, 2021	<p>Effective January 1, 2021, VAT registered taxpayers in Uganda are required to issue e-invoices through the Electronic Fiscal Receipting and Invoicing Solution Server (EFRIS). 161</p> <p>→ Updates for Uganda continue on next page.</p>

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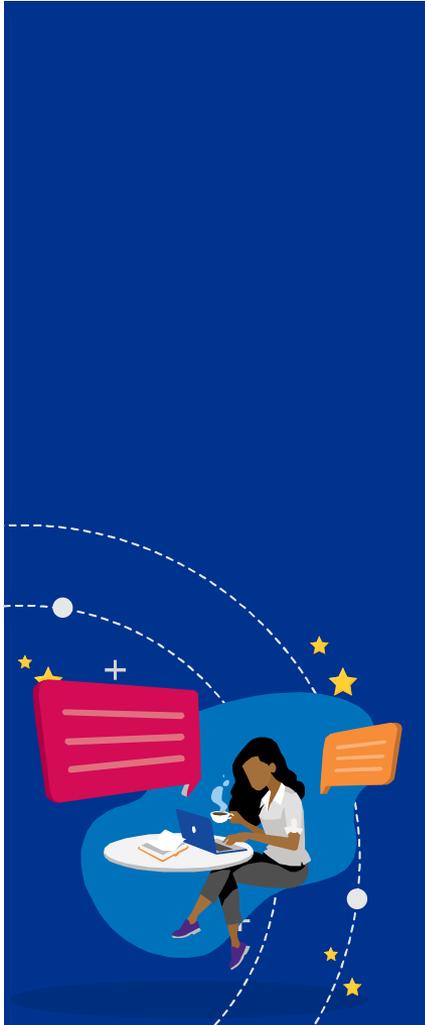
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	Country	Status	Effective date	Brief description
	*Uganda (continued)		N/A	<p>The Uganda Revenue Authority (“URA”) recently announced that it added a number of new features for the benefit of importers and exporters to its Uganda Electronic Single Window (UESW) platform.</p> <p>The changes are intended to ease the burden of cross-border traders of receiving the required permits and licenses, enabling them to receive the necessary documents electronically and removing the requirement to attend up to 14 various different ministries, departments, or agencies in person.</p> <p>The new features cover, among other things, the processes to benefit from tax exemption from the URA and licenses to operate in the country's free zones, from the Uganda Free Zones Authority. 162</p>
			June 1, 2021	<p>The URA recently published a list of certified EFRIS software integrators who have fulfilled URA's integration requirements. Taxpayers that would like to opt to integrate their billing/ERP systems with EFRIS for issuance of e-invoices and e-receipts can leverage URA's approved list of providers. 163</p>
	United Arab Emirates		2021	<p>The government of Dubai has planned to go completely paper free in 2021, eliminating more than 1 billion pieces of paper used for government transactions every year, saving time, resources and the environment. As a fully paperless government, 100 per cent of internal and customer transactions will be digitized from 2021. That means the Government will no longer issue or ask for paper documents across all of its operations. Dubai is focusing on implementing the necessary technology to enable paper-free transactions and a legal framework to address digital procedures. 164</p>

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Citations



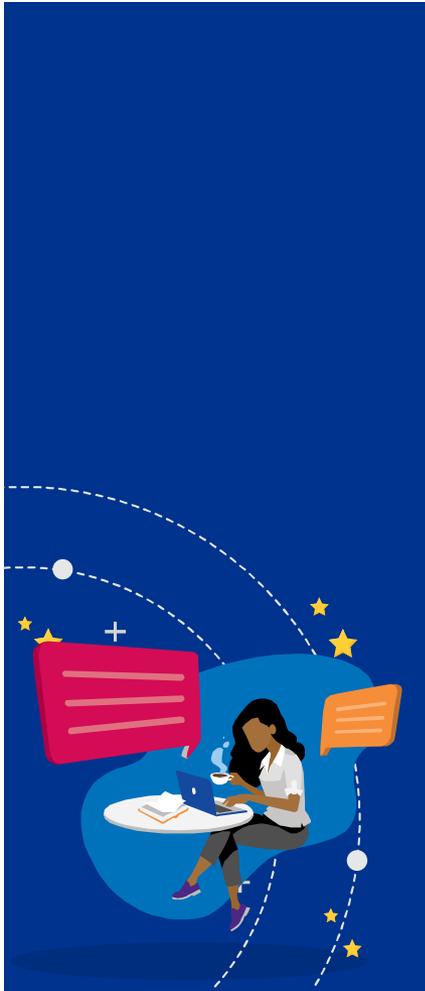
Citation	
1	KPMG International member firm in Argentina
2	KPMG International member firm in Argentina
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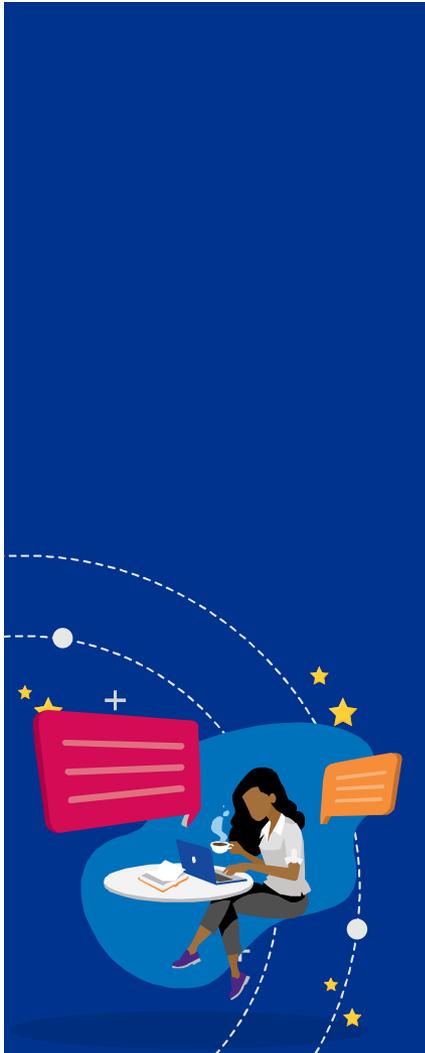
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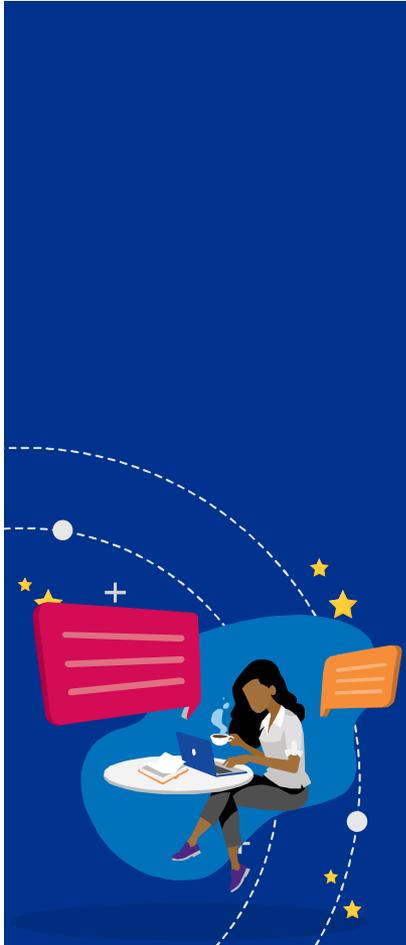
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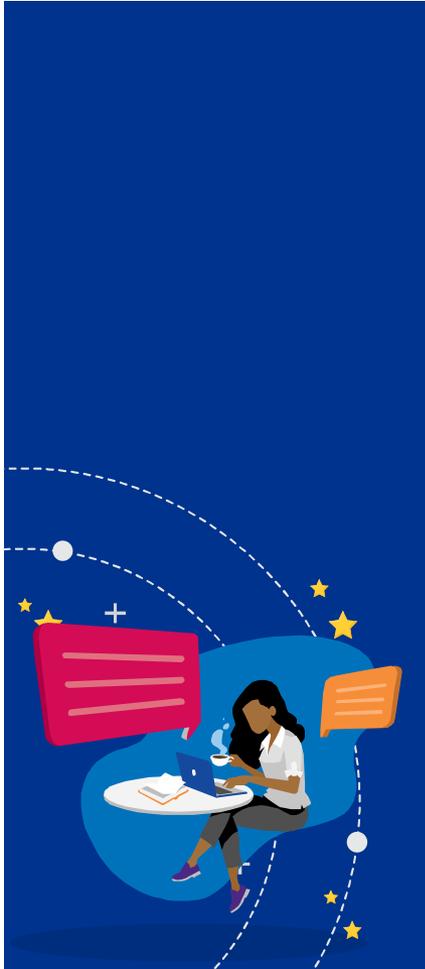


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