Caught Between a Tax and a Hard Place? ViDA, CTC, E-Invoicing & SAF-T

An overview of our key pillars shaping the future of tax compliance

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JD EDWARDS NORDIC CONFERENCE 2025

September 30, 2025

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Session overview

+ ViDA and the three pillars
+ E-invoicing and e-reporting today
+ What to do next?
+ Our experience

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ViDA and the three pillars

VAT in the Digital Age

The issues to be solved

Pillar I

Digital reporting requirements

Reporting is not digitalized, and Member States are introducing varying DRRs in an uncoordinated manner

Pillar II

Platform economy

Traditional and digital businesses are not treated equally

Pillar III

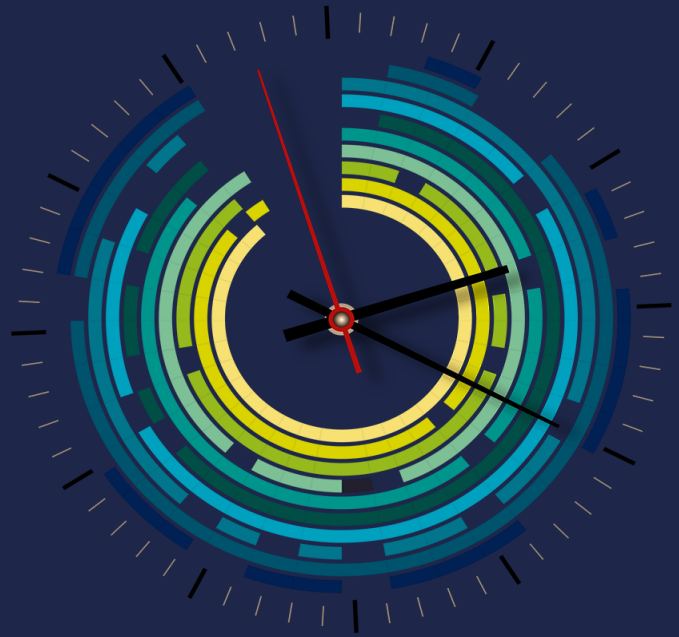
Single VAT registration

Number of instances where businesses need to register in more than one Member State can still be reduced.

Pillar I

Digital Reporting Requirements

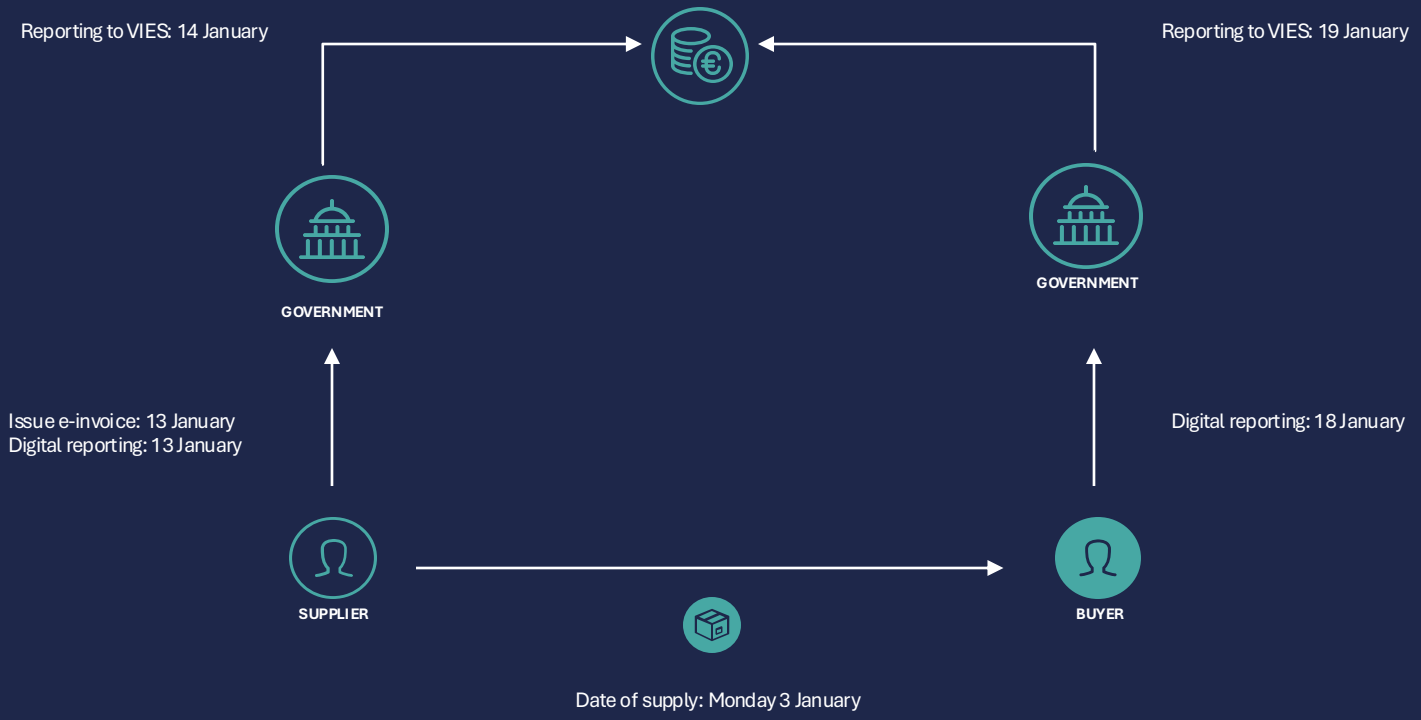
- Mandatory e-invoicing for all B2B cross-border transactions within EU (10 days from taxable event)
- Transmission of invoice date to the authorities (seller and buyer)
- Removal of European Sales List



2030

2035

Pillar I


Reporting to VIES: 14 January
Reporting to VIES: 19 January
GOVERNMENT
GOVERNMENT
Issue e-invoice: 13 January
Digital reporting: 13 January
Digital reporting: 18 January
SUPPLIER
BUYER
Date of supply: Monday 3 January

Pillar II

VAT treatment of the Platform economy

- Platforms may be made liable for collecting and remitting VAT on behalf of sellers using their services.
- Simplified VAT compliance procedures will be introduced for platforms

2028

Pillar III

Single VAT registration

+ Businesses will be able to register for VAT in one member state and have that registration recognized across the entire EU
+ The IOSS will simplify VAT collection on low-value goods imported into the EU
+ The existing One-Stop Shop (OSS) scheme will be extended to cover more types of transactions and businesses

2028

E-invoicing and e-reporting today

Tax authorities are going digital and focus on system setup and the collection of data

UK
- 'Making Tax Digital' (MTD)
- Digitization of tax submissions
- VAT return from April 2019

Romania
- SAF-T- since 2022
- E-invoicing since 2024
- E-transport system in place
- B2C e-invoicing planned for 2025

Netherlands
- Mandated audit file structure on request
- Financial GL data

Norway
- Mandatory SAF-T reporting since January 2020

Germany
- Mandated audit file (GoBD/GDPdU) structure upon request

Lithuania
- SAF-T applicable (i.SAF) for VAT invoices (issued and received), also additional customs information and goods documents on demand since 2016

Ireland
- Electronic submission of Payroll Tax Data from 2019 at time of payment

Kazakhstan
- E-invoicing mandatory since 2019

Russia
- Comprehensive invoice details filed with VAT return
- E-invoicing, online digital cash registers, RFID tagging of high-value goods

Mexico:
- Mandatory digital invoicing

Luxembourg
- SAF-T applicable
- OECD SAF-T based: GL, invoices, payments, customers, suppliers, tax table
- Upon request

Italy
- Mandatory e-invoicing since 2019 (SDI)

China
- Golden Tax system (e-fapiao) rollout in progress
- No SAF-T or e-audit

Poland
- SAF-T applicable (JPK) since 1 July 2016
- Electronic submission of tax returns
- Several other files mandatory upon request (bank statements, warehouse info, comprehensive GL info)

France
- Reduced SAF-T applicable
- Data of statutory accounting
- Upon request

Singapore
- Simplified SAF-T: IRAS Audit File (IAF)
- Upon request

Malaysia
- With GST repealed GST audit file (GAF) is no longer applicable
- With SST reinstated we expect GAF likely to be introduced soon

Portugal
- SAF-T applicable
- Both monthly and upon request
- B2G eInvoicing from 2019

Chile
- Mandatory digital invoicing allowing prepopulated VAT return

Angola
- Introduction of VAT with SAF-T from July 2019

Indonesia
- E-invoice mandatory since 2016
- No SAF-T or E-audit

Spain
- Spanish SII implemented in 2017

Czech Republic
- Comprehensive invoice details due with every tax return
- No e-audit

Austria
- SAF-T applicable
- Depends on requested information
- Upon request

Brazil
- Early adopter of e-invoicing 2008, complex system
- Disclose full invoice details before obtaining valid invoice number
- On a regular basis

Slovenia
- Standardized file used for electronic tax data
- Used in tax audit and similar procedures
- Upon request

South Africa
- 'IT14SD' reconciliation of return to ledgers for Income Tax, VAT, PAYE, and Customs

Hungary
- Real-time reporting since 2021
- Online connection established between invoice invoicing software and the tax authorities' system as of 1 July 2017

Australia
- E-audit introduced recently but upon request
- No SAF-T
- Introduction of e-invoicing based on Peppol (coordinated with New Zealand)

New Zealand
- Promoting e-invoicing based on Peppol

Terminology: E-invoicing <> RTR <> E-filing <> E-Audit

Real-time reporting putting pressure on finance functions:

- **Spanish SII reporting:** Electronic AP and AR invoice submission in near real-time – **every 4 days**
- **Hungary real-time upload:** Electronic submission of **all domestic AR 'B2B' invoices in real-time**: e-Invoicing to regulator

e-Filing focus on driving **automated** processing **from source** data **to filing:**

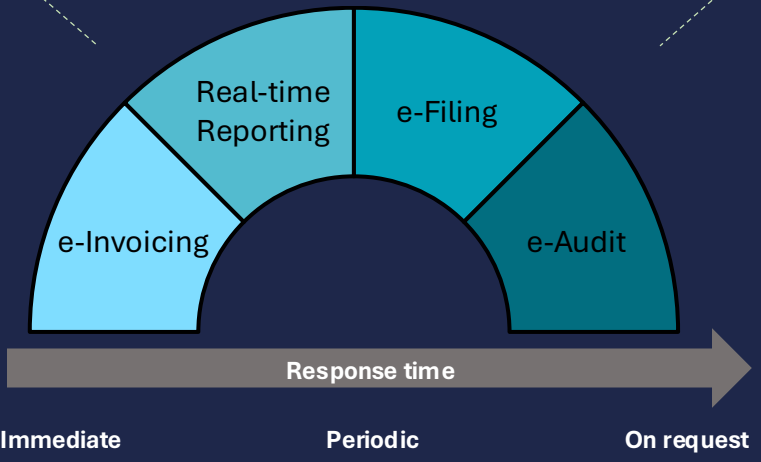
- **UK MTD:** The UK's Making Tax Digital initiative to automate the submission of VAT reporting.
- **Poland JPK:** Electronic submission of book information (warehouses, finance) on a monthly process.

Electronic transfer of **invoice data** as **transactions** are created and booked in accounting systems. Governments capture data as it is created:

- **Italian SDI:** Requires real-time submission of all B2B and B2C invoicing in electronic format

e-Audit focusing on **all data hosted within ERP and other systems.** Slower to respond, but more comprehensive:

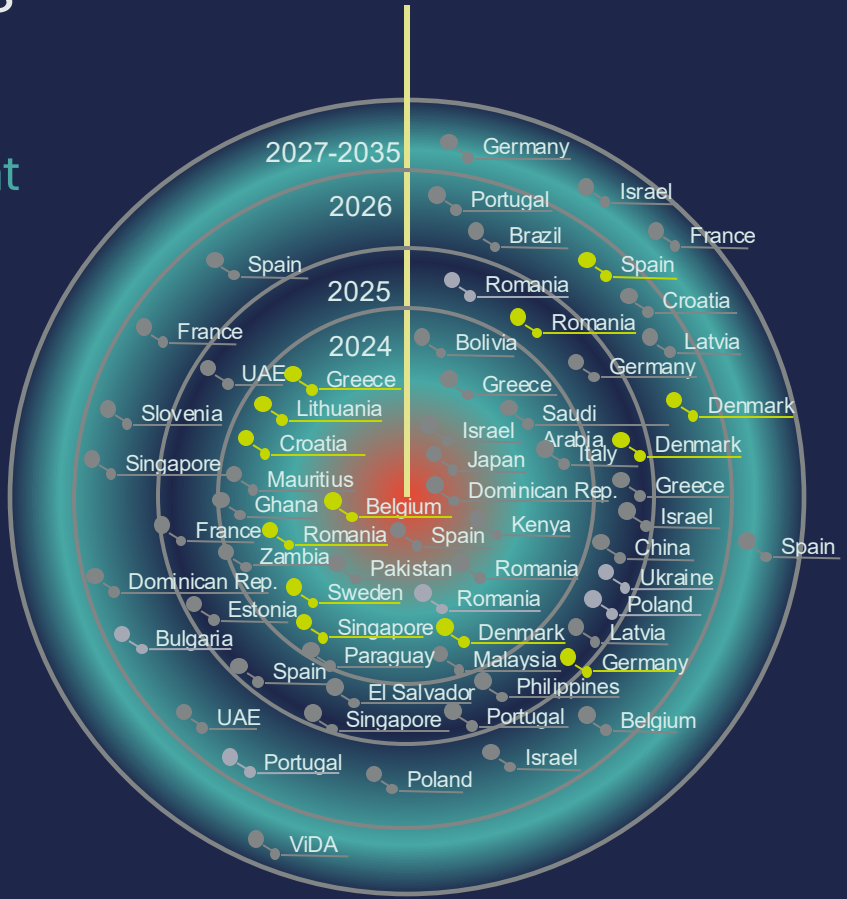
- **Norwegian SAF-T:** Require entire ERP system to be uploaded in electronic filing format. Potentially looking at entire back-up of ERP systems.



"New reporting requirements create new types of challenges for:
tax calculations, electronic documents handling, tax declarations** and **validations and controls."

Digital Reporting Requirements

Global Development



Updates

E-invoicing

2024

Jan
- Greece (B2G – Extended to rest of Central Administration & QR Code)
- Saudi Arabia (phase 2, wave 6)
- Japan (B2B e-Invoice Retention)
- Italy (Widened scope <25k EUR)
- Dominican Rep. (B2B- Large Taxpayers Gr. 1)
- Kenya (Non-VAT registered entities through eTIMS)
- Spain/Basque (Bizkaia (RTIR))
- Romania (B2B: e-reporting)

Feb
- Bolivia (B2B- Group 4)
- Saudi Arabia (phase 2, wave 7)
- Pakistan (Mandate for FMCG)

Mar
- Sweden (Dispatch Advice Projects >SEK 50 million)
- Romania (e-Transport: extended scope)
- Dominican Rep. (B2B- Large Group 2)
- Belgium (B2G contracts <30k EUR)
- Bolivia (B2B- Group 5)
- Saudi Arabia (phase 2, wave 8)

Apr
- Bolivia (B2B- Group 6)

May
- Mauritius (>RS 100 M)
- Israel (>25.000 NIS)
- Dominican Republic (B2B- target Group 3)

Jun
- Saudi Arabia (phase 2, wave 9)
- Lithuania (B2G SABIS platform)
- Greece (B2G Remaining Contract. Authorities)

Jul
- Bolivia (B2B- Group 7)
- Zambia (All taxpayers e-invoicing)
- Denmark (Business w. annual report obligation using standard DBS must book digitally from next period)
- Romania (B2B: e-invoicing)

Aug
- Malaysia (B2B/B2G) (>RM 100 M)

Sept
- Sweden (Dispatch Advice Machinery & transport)
- Singapore (Service provider reaccreditation)

Oct
- Bolivia (B2B- Group 8)
- Paraguay (end of rollout)
- Saudi Arabia (phase 2, wave 10)

Nov
- Saudi Arabia (phase 2, wave 11)

Dec
- Saudi Arabia (phase 2, wave 12)
- Ghana (e-invoicing, remaining TP)
- Bolivia (B2B- Group 9)
- Croatia (Fiscalization 2.0 for SMB)
- Greece (Dispatch Advise)

E-reporting

2024

Jan
- Romania (SAF-T)

Updates

E-invoicing

2025

Jan

- Romania (B2C - RTIR)
- Germany (Remove buyer consent for EN invoices)
- Denmark (Business sw. annual report obligation using standard DBS must book digitally from next period)
- Greece B2B Mandate
- Israel B2B Large & updated specs
- China (e-fapiao countrywide implementation)
- Saudi Arabia (phase 2, wave 13)
- Latvia (B2G)
- Philipinnes (B2B – Further expansion of target taxpayers)
- Portugal QES in PDF B2C & B2B. Medium & Small e-invoice B2G
- Malaysia (B2B/B2G) >RM 25 M
- El Salvador (B2C- e-tickets fore-issuers)

Mar

- Sweden Dispatch Advice Projects >SEK 35 million

May

- Dominican Rep. (B2B- Medium Taxpayers)
- Singapore B2B-Voluntary

Jul

- Estonia e-invoices upon buyer request
- France E-invoicing Pilot
- Malaysia (B2B/B2G) All taxpayers
- Spain Verifactu
- Germany e-Cash register systems must be reported
- UAE (E-invoicing leg & rollout strategy

Sept

- Sweden Dispatch Advice Projects >SEK 20 million
- Spain Crea y Crece (Largee-invoice + IRM)

Nov

- Singapore B2B- Newly Voluntary

E-reporting

2025

Jan

- Romania (SAF-T)
- Ukraine (SAF-T)
- Poland (JPK_CIT)

Updates

E-invoicing

2026 | 2027 | 2028 | 2030 | 2035

Jan
- Portugal — QRS in PDF B2C & B2B. Medium & Small e-invoice B2G
- Brazil: IBS/CBS
- Spain/Basque: Bizkaia (RTIR)
- Croatia — B2B mandate from 1 Jan 2026 - EU derogation requested
- Latvia — (B2B – e-invoicing mandate)
- Denmark — (Sole traders must book digitally from next accounting period)
- Belgium — (B2B all businesses)
- Israel — B2B NIS 15.000

Feb
- Poland — businesses >PLN 200 million

Apr
- Singapore — B2B-All voluntary registered GST
- Poland — KSeF: All businesses

May
- Dominican Rep. — (B2B- All)

Jun
- Slovenia — B2B countrywide

Jul
- UAE — gradual roll out

Sep
- France — B2B AR Large business
- France — B2B AP: All businesses
- Spain — Crea y Crece (Large e-invoice + IRM)

Jan
- Germany — (No paper or unstructured format – large taxpayers)
- Israel — B2B NIS 10.000

Sep
- France — B2B- All business AP&AR
- Spain — Crea y Crece (Sole trader sIRM)

Jan
- Germany — Non EN-compliant EDI no longer permitted- All
- Israel — B2B NIS 5.000

Jan
- EU ViDA — e-invoicing requirements
- EU ViDA — DRR requirements

Jan
- EU ViDA — MS Harmonization

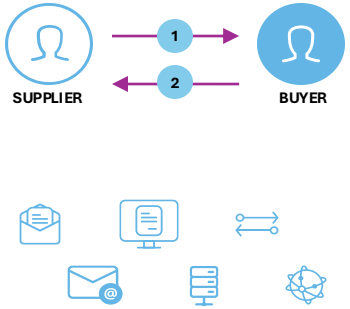
E-reporting

2026

Jan
- Portugal (SAF-T)
- Bulgaria (SAF-T)

Terminology: Continuous transaction controls – main models

Post Audit

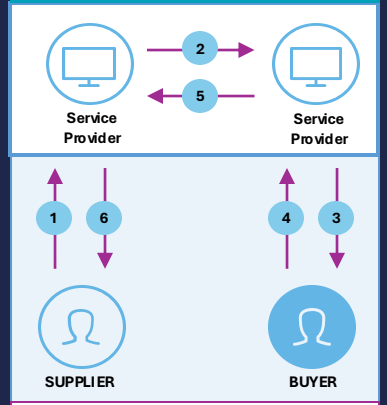


Trading parties are **free to agree** on method and technology used

Belgium

Germany

Interoperability (4-Corner Model)

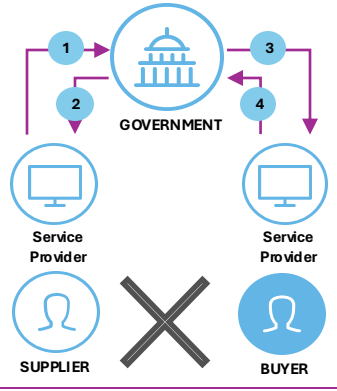


Fully digital exchange of any transaction documents via interoperable **service providers**

Peppol

Australia

Centralised Invoicing

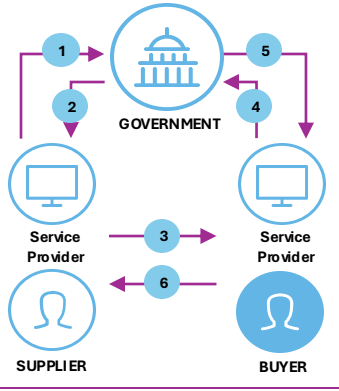


Transactions in exchanged by a predefined **mandated infrastructure**

Italy

Turkey

Clearance (Variations) & VIDA?



Government approval required pre-issuance and validation post-receipt

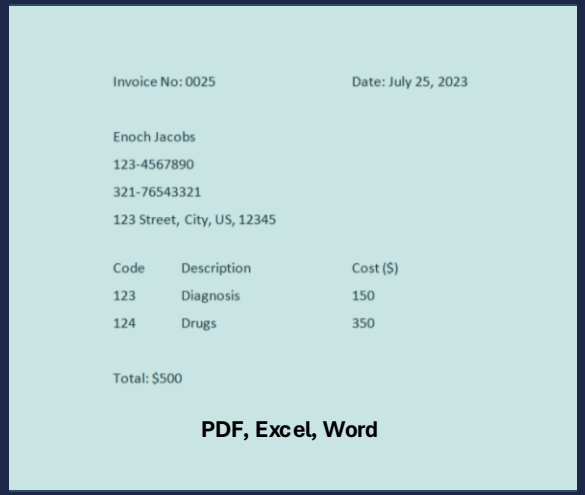
Chile

Mexico

France

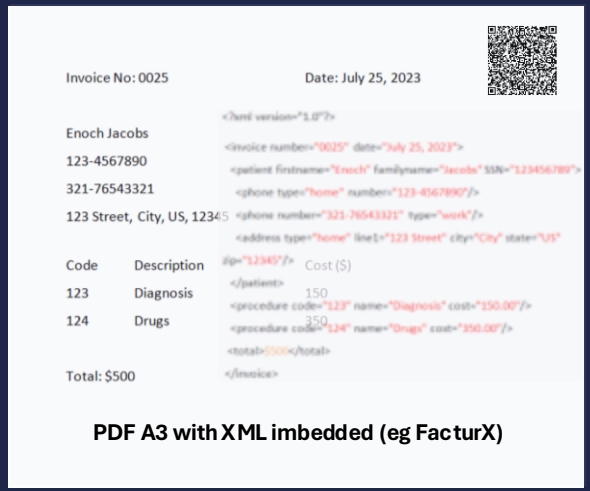
Terminology: E-invoice is a document in a structured electronic format

Unstructured
Visible and readable by **people**



PDF, Excel, Word

Hybrid
Visible and readable by **computers & people**



PDF A3 with XML imbedded (eg FacturX)

Structured
Readable by **computers**

XML, CII, UBL

Paper/E-mail PDF/Scanned

Manual process

Human readable

Digital

Automated invoice process and digital processing

Human readable

Computer readable

So – what are the key issues?

01

Landscape diversity

Multiple, often divergent requirements across the globe drive the cost of global compliance.

02

A legal obligation

Not a business requirement! Non-compliance can lead to severe penalties, even a halt in operations.

03

Processes impacted

Impacts not just the Tax function (Record to Report), but also Source to Pay, Order to Cash as well respective business systems.

04

Digitalization push

Essentially, a government mandated digital transformation requirement.

“A cross-business, cross-service topic with far-reaching legal, operational, system, and governance implications.”

05

A Global topic

Tackling country by country may lead to duplication of effort, or possibly incompatible solutions and processes.

06

No “one-size fits all”

Strategic approach and the solution of best fit needs to be identified on a case-by-case basis.

What to do next?

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Who should be involved & who owns the solution

E-invoicing

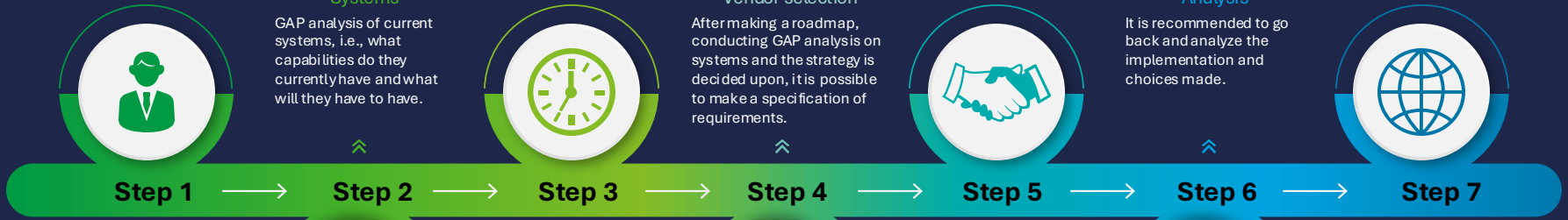
Scope of project:

- Is cross functional, impacting all types of legal entities (plant, principal, LRD, FRD, service entity, holding)
- Has consequences on Commercial, Supply Chain and General Procurement functions
- Has a strong link with external parties; and
- Is skewed towards local specs given absence of unique solution and different country requirements

Models we see in the market (ERP perspective)

Canonical Model + Global Broker	Hybrid Model Global Broker + ERP	ERP- Centric Model
Middleware + Broker	Broker + ERP	ERP + Gap-filling
An intermediate layer and external tooling	**Primary tooling with secondary gap-filling**	**ERP-driven compliance**
Consolidation and transformation of data from various sources into *one standard universal data format* to simplify connectivity to a global broker. Implementation of a third-party solution.	A third-party broker and ERP plug-ins are used to *complement each other*, allowing for flexibility per supported countries. A careful and detailed assessment is required to ensure the benefits are utilized to maximum extent.	Central IT / ERP Team responsible for setup, customizing and maintaining ERP plug-in solutions based on local requirements, as well as stakeholder coordination. *ERP-first and native ERP driven compliance.*

7 steps to a successful implementation



Step 1

Roadmap

Identify requirements

- What countries are and will be applicable for us?
- What transactions will be applicable for us?

Step 2

Systems

GAP analysis of current systems, i.e., what capabilities do they currently have and what will they have to have.

Step 3

Strategy

- Shall e-invoicing be steered from a central level or a local level?
- Which persons should be involved?
- What departments need to be involved?

Step 4

Vendor selection

After making a roadmap, conducting GAP analysis on systems and the strategy is decided upon, it is possible to make a specification of requirements.

Step 5

Implementation

The implementation will vary depending on the choices made in previous steps. An implementation partner is recommended.

Step 6

Analysis

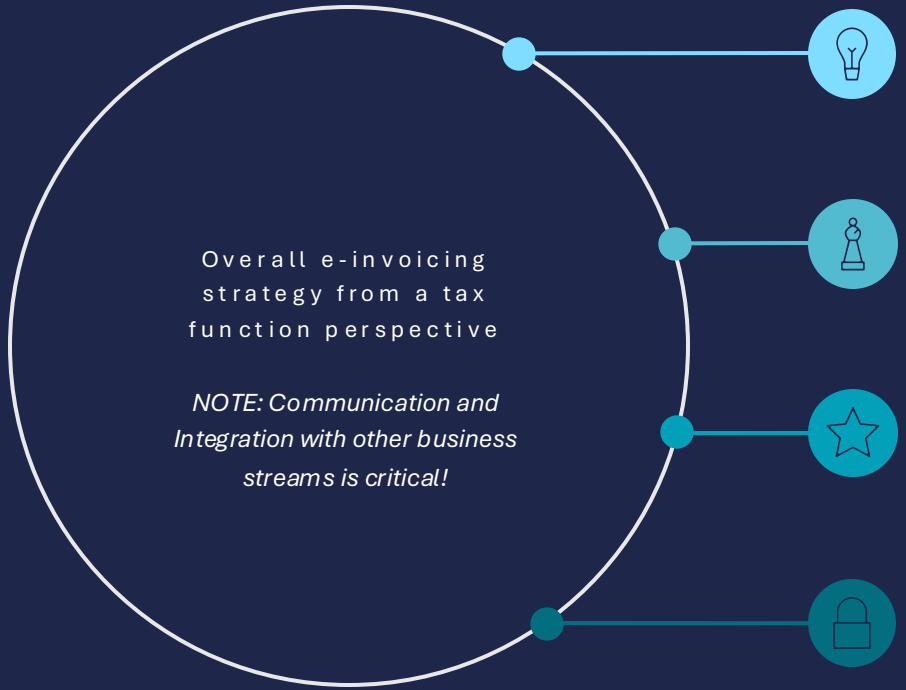
It is recommended to go back and analyze the implementation and choices made.

Step 7

Ongoing maintenance

New requirements will come and therefore ongoing maintenance will have to be done on a continuous basis.

Examples of initial discussions and expectation setting



Overall degree of centralization & harmonization & People

E.g. decisions around a CoE, decision making mandates across various levels of the organization, team and resourcing structures, RACI and governance, costing model and cost distribution

Country release management, compliance and business & Processes

E.g. Rollout management plan, Gap analysis, continuous compliance monitoring and compliance functions, Local implementations, operational and business processes – Order to Cash, Source to Pay

Architecture & systems & data

E.g. Decision on system support, integrations across IT landscape and tax systems/service, tax master data management and vendor specific IT questions, compliance technology, availability of data and data models

ERP transformation roadmap

E.g. ERP e-invoicing add-ons, typical transformation design topics such as structure of tax codes, foreign VAT registrations, legal company setup, etc.

Examples of initial discussions and expectation setting

Strategic, high-level discussions:

- What are your **strategic considerations** about approaching the e-invoicing and digital mandates globally?
- What is the **degree of centralization** within your enterprise, and to what extent can this be leveraged or would affect driving a centralized e-invoicing project?
- Do you currently operate **shared service centers** and what is their role in adapting to the new mandates?
- Are you considering a E-invoicing **Centre of Excellence** or a service center supporting the rest of the organization on the matter?
- What does your **ERP roadmap** look like for the next 3 years?

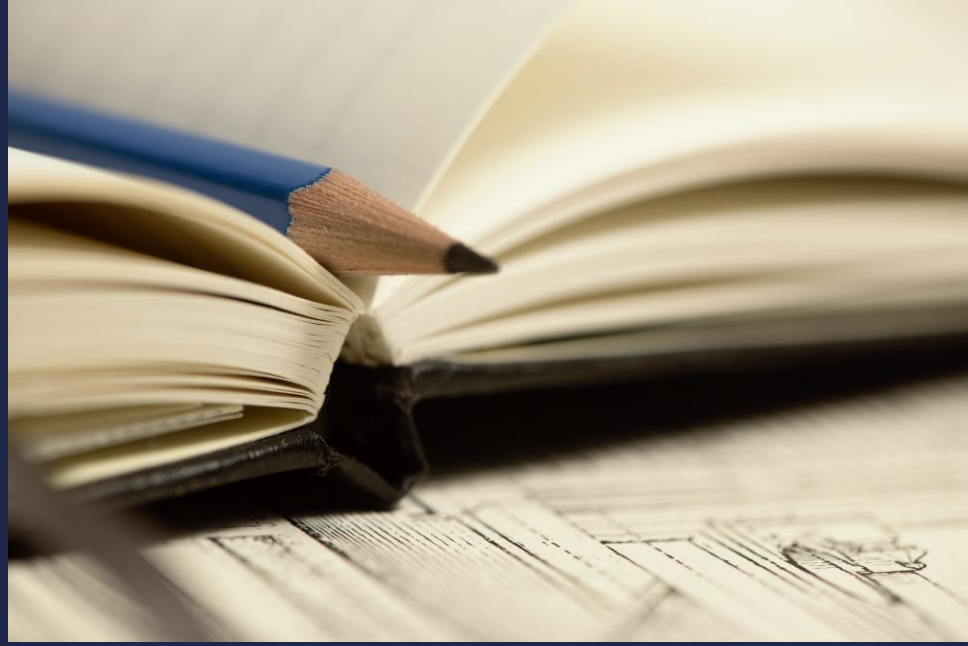
…

Solution-oriented discussions:

- Who holds the **budget ownership** for the Digital Solution Strategy, and is it managed locally or globally?
- What level of **country coverage** do you expect from the solution?
- Does your organization possess adequate **local IT support** capacity to effectively implement and maintain the solution??
- Would you like to implement **optional B2B e-invoicing** in cases where it is not mandatory but offered as an option?
- How many **invoices** does your organization typically process on an annual basis per entity, in terms of **volume**?
- Are there any **other services you envision in relation to the e-invoicing,** such as email distribution, digital signature, content validation, transaction reporting, etc.?
- Are you interested in connecting with **interoperability networks/**recipients such as Peppol, Pagero, Edicom, etc.?

….

Our experience



Best practice we see in the market:

Centralization

01

Reusability of effort

Centralizing knowledge and ensuring that duplications of efforts for the BAs and Group are minimized. (e.g. external support, advice, internal resources working on identifying and maintaining the knowledge on local rules and regulations & impact assessment, etc.)

02

Knowledge retention

Having a central team working together with local business over time ensures experiences learned and/or issues identified within all BAs can be shared in the coming roll-outs in an efficient way. This ensures insights and knowledge around e-invoicing and its impact, including implemented solutions remains centrally within the group.

03

OTP considerations

Large number of transactions covered by the mandates relate to intra-group invoicing. In practice, these transactions require the whole businesses to co-operate, further enhancing the positive impact of a centralized approach

Summary

+ E-invoicing will affect the IT systems
+ There are several stakeholders in an e-invoicing project, not only Tax
+ We have to start now to ensure readiness

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September 30, 2025

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Wrap up

How can xperitus help?

Solution we made

- SAF-T
- E-invoicing
- Bank files

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Questions?

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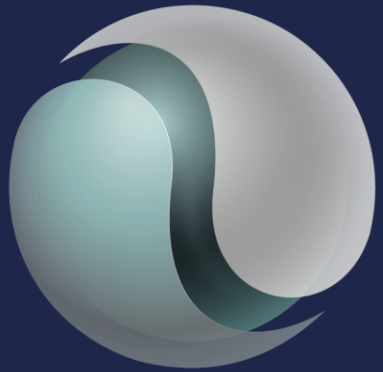

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ERP systems specialists