



COMARCH

Mastering Germany's E-Invoicing Mandate feat. PwC

Protect Your Input VAT, Automate XML
Workflows, and Safeguard Global ERPs

29 September 2026

COMARCH

Who's with you today?



Michał Kacperek
DACH Consulting Director
Comarch



Rafał Trojanowski
Head of Legal Compliance
Comarch



Victoria Etzold
Manager Tax Technology
PwC

IDC MarketScape:

Worldwide Compliant E-Invoicing
Solutions 2026 Vendor Assessment
(doc #EUR154882626, September 2026)

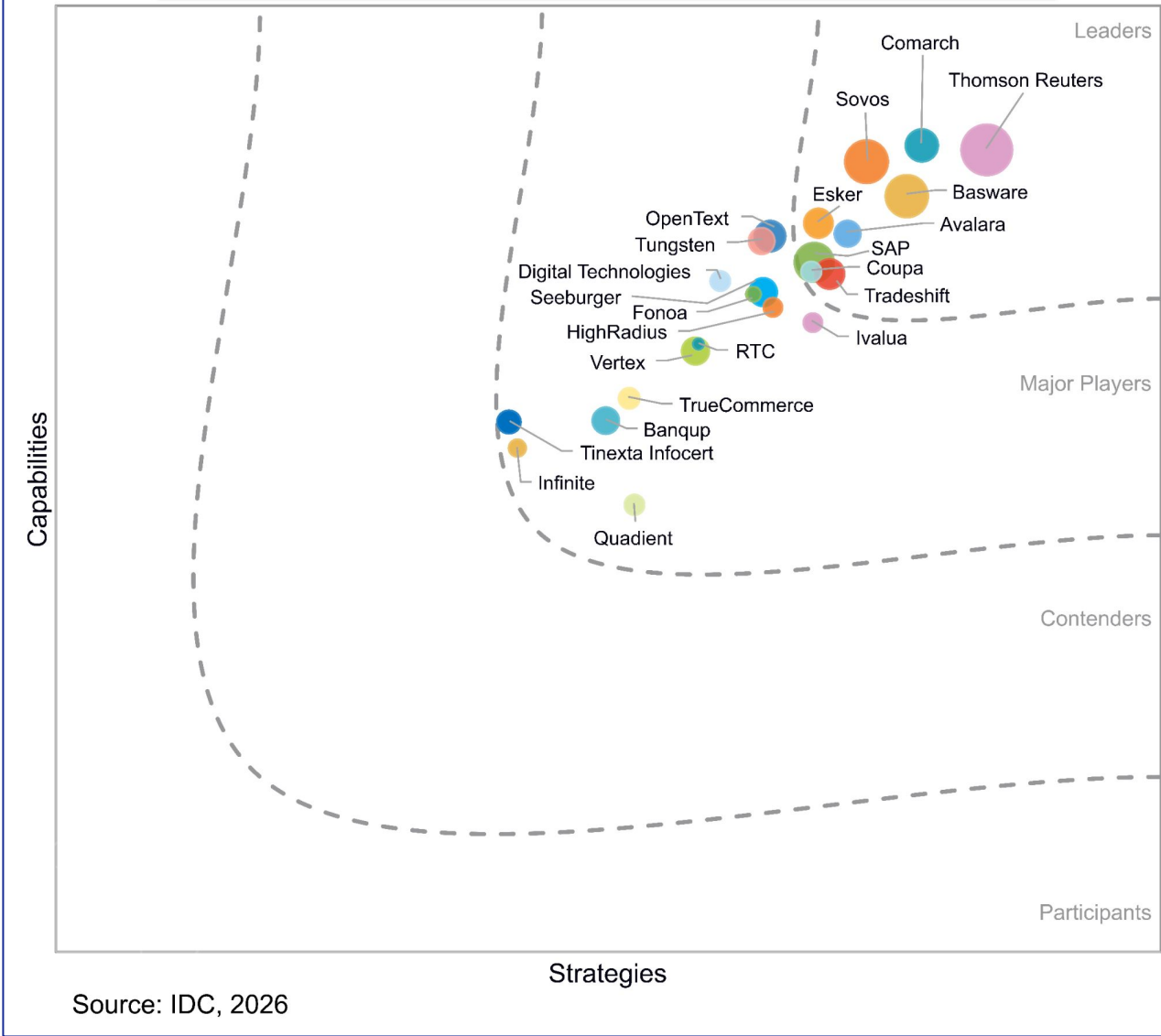
“IDC has positioned Comarch in **the Leaders category** of this 2026 IDC MarketScape for Worldwide e-Invoicing Compliance Solutions.”

“Consider Comarch if you are a large, multicountry enterprise, often running several ERP systems and high document volumes in retail, FMCG, manufacturing, or logistics, that wants compliance and commercial document exchange on a single in-house platform, values direct ownership of legal compliance and transparent pricing, and can accept local partner coverage outside Europe.”

Download the
excerpt from
[our website](#)



IDC MarketScape: Worldwide Compliant e-Invoicing Solutions 2026



IDC MarketScape vendor analysis model is designed to provide an overview of the competitive fitness of technology and suppliers in a given market. The research methodology utilizes a rigorous scoring methodology based on both qualitative and quantitative criteria that results in a single graphical illustration of each supplier's position within a given market. The Capabilities score measures supplier product, go-to-market and business execution in the short-term. The Strategy score measures alignment of supplier strategies with customer requirements in a 3-5-year timeframe. Supplier market share is represented by the size of the icons.

Comarch | About Comarch

1991



Research institute
at **Cracow University of
Technologies**

1993



Official **company
foundation** and entry in
commercial register

CVC



Since 2024 part of
CVC Capital Partners

Headquarters
HQ in Cracow,
Poland



+4,000



employees globally
and **+400** in the **DACH**
region

Global Reach



over **90 offices** in
over **30 countries**

93%



Revenues generated
from **own solutions**

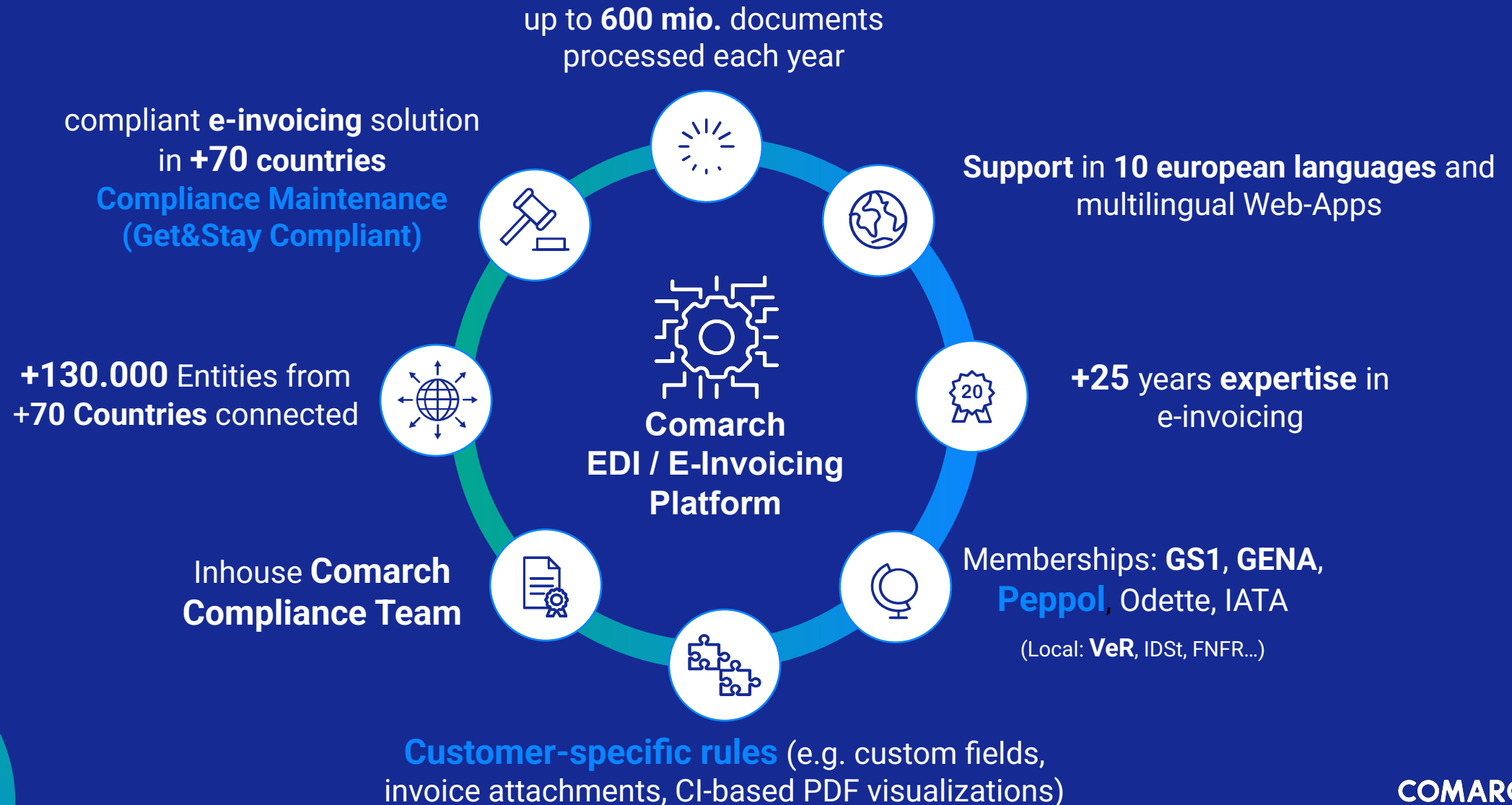
ERP Agnostic



#Multisystem,
#Multichannel and
#Multiformat!



Comarch EDI/E-Invoicing Platform | Highlights



Comarch E-Invoicing | Globaler E-Rechnung-Hub



Get & Stay Compliant!

Compliance Maintenance
Everywhere

COMARCH

**Why is Germany
so different?**



e-invoice in Germany

-  **When:** January 1, 2025/January 1, 2027
-  **What:** Domestic B2B Accounts Payable since 2025 (ability to receive)
Domestic B2B Accounts Receivable since 2027
-  **Format:** EU CEN 16931 conform (i.e. ZUGFeRD 2.2.+ & XRechnung 3.0.1.+, Peppol (?))
-  **Portal:** - good question -
-  **Channel:** - good question - (e-mail? Peppol? EDI?)

German e-invoicing project | Accounts Payable

Comarch CEN Compliance Engine

ZUGFeRD

XRechnung

Peppol

(?)

- EN16391 CII Invoice
- EN16391 UBL Invoice
- EN16391 UBL Credit Note
- XRechnung UBL Invoice V2.0
- XRechnung UBL CreditNote V2.0
- XRechnung CII Invoice V2.0
- XRechnung UBL Invoice V2.0 Extension
- XRechnung UBL CreditNote V2.0 Extension
- XRechnung CII Invoice V2.0 Extension
- XRechnung UBL Invoice V2.1
- XRechnung UBL CreditNote V2.1
- XRechnung CII Invoice V2.1
- XRechnung UBL Invoice V2.1 Extension
- XRechnung UBL CreditNote V2.1 Extension
- XRechnung CII Invoice V2.1 Extension
- XRechnung UBL Invoice V2.2
- XRechnung UBL CreditNote V2.2

- XRechnung CII Invoice V2.2
- XRechnung UBL Invoice V2.2 Extension
- XRechnung UBL CreditNote V2.2 Extension
- XRechnung CII Invoice V2.2 Extension
- XRechnung UBL Invoice V2.3
- XRechnung UBL CreditNote V2.3
- XRechnung CII Invoice V2.3
- XRechnung UBL Invoice V2.3 Extension
- XRechnung UBL CreditNote V2.3 Extension
- XRechnung CII Invoice V2.3 Extension
- XRechnung UBL Invoice V3.0
- XRechnung UBL CreditNote V3.0
- XRechnung CII Invoice V3.0
- XRechnung UBL Invoice V3.0 Extension
- XRechnung UBL CreditNote V3.0 Extension
- XRechnung CII Invoice V3.0 Extension
- XRechnung UBL Invoice V3.0.1

- XRechnung UBL CreditNote V3.0.1
- XRechnung CII Invoice V3.0.1
- XRechnung UBL Invoice V3.0.1 Extension
- XRechnung UBL CreditNote V3.0.1 Extension
- XRechnung CII Invoice V3.0.1 Extension
- XRechnung UBL Invoice V3.0.2
- XRechnung UBL CreditNote V3.0.2
- XRechnung CII Invoice V3.0.2
- XRechnung UBL Invoice V3.0.2 Extension
- XRechnung UBL CreditNote V3.0.2 Extension
- XRechnung CII Invoice V3.0.2 Extension
- Peppol BIS Billing UBL Invoice V3
- Peppol BIS Billing UBL CreditNote V3
- Peppol BIS Billing CII Invoice V3
- ZUGFeRD 2.0.1 Comfort (EN16391)
- ZUGFeRD 2.0.1 Extended
- ZUGFeRD 2.0.1 Basic

- ZUGFeRD 2.1.1 Comfort (EN16391)
- ZUGFeRD 2.1.1 Extended
- ZUGFeRD 2.1.1 Basic
- ZUGFeRD 2.2 Comfort (EN16391)
- ZUGFeRD 2.2 Extended
- ZUGFeRD 2.3 Basic
- ZUGFeRD 2.3 Comfort (EN16391)
- ZUGFeRD 2.3 Extended
- ZUGFeRD 2.3 Basic
- ZUGFeRD 2.4 Basic
- ZUGFeRD 2.4 Comfort (EN16391)
- ZUGFeRD 2.4 Extended
- ZUGFeRD 2.4 Basic
- ZUGFeRD 2.5 Basic
- ZUGFeRD 2.5 Comfort (EN16391)
- ZUGFeRD 2.5 Extended
- ZUGFeRD 2.5 Basic

what about XRechnung 4.0
or EDIFACT?

German e-invoicing project | Accounts Payable

E-Mail

1. E-Mail Integration: General E-Mail vs. Dedicated E-Mail

1.1 **General E-Mail:** You keep your current e-mail address (e.g. Rechnungseingang@company.de)

1.2 **Dedicated E-Mail:** You get a separate one (e.g. E-Rechnungseingang@company.de)

In both cases Comarch receives, validates and converts your invoices.

Peppol

2. Peppol Integration: Comarch registers you in the Peppol network to enable receipt via Peppol.

EDI

3) EDI Integration: Comarch onboards your suppliers directly via direct EDI connections.



Comarch CEN E-Mail Screener:

We scan your e-mail box, identify e-mails with e-invoice attachments.

We take it out, validate and convert for you automatically.

Future proof for upcoming German e-reporting system and ViDA

COMARCH

German e-invoicing project | Accounts Receivable

E-Mail

1. E-Mail Integration: Comarch sends e-invoice via e-mail.

(Important: Comarch ensures a proper free of error invoice quality)

Peppol

2. Peppol Integration: Comarch finds the received in the Peppol networks and sends the invoice via Peppol.

EDI

3. EDI Integration: Comarch onboards your customers directly via direct EDI connections.

E-Mail First



E-Mail Submission

vs

Peppol First



Peppol
Access Point
CERTIFIED PROVIDER

Supported AR Peppol Formats:

Peppol BIS Billing UBL Invoice V3
Peppol BIS Billing UBL Credit Note V3
Peppol BIS Billing CII Invoice V3
XRechnung UBL Invoice V3.0
XRechnung UBL Credit Note V3.0
XRechnung CII Invoice V3.0
UBL Invoice EN 16931
UBL Credit Note EN 16931 CII Invoice
Peppol BIS Self-Billing UBL Invoice V3
Peppol BIS Self-Billing CII Invoice V3
Peppol BIS Self-Billing UBL Credit Note V3

Future proof for upcoming German e-reporting system and ViDA

COMARCH

Vielen Dank!

In case of any questions I am happy to be contacted directly:



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The background of the slide features a dark blue globe with a glowing blue network overlay. The network consists of numerous small, bright blue dots connected by thin, light blue lines, creating a complex web that covers the entire globe. The globe itself is partially obscured by the network, with some landmasses visible in a lighter blue tone. The overall aesthetic is high-tech and digital.

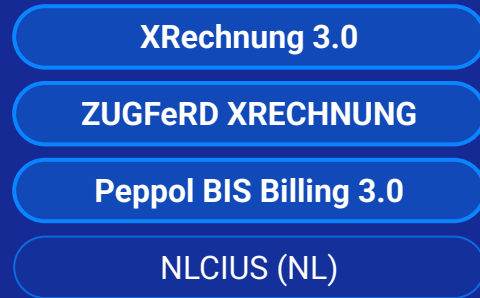
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Beyond the Format: Technical Compliance for Germany

Rafał Trojanowski
Head of Legal Compliance

EN 16931

CIUS – stricter national or network rules (XRechnung, Peppol BIS 3.0)



Core – one semantic model, bound to UBL and CII

ZUGFeRD EN 16931

Extensions – extra elements on top of the core (e.g. ZUGFeRD EXTENDED)

ZUGFeRD EXTENDED

XRechnung Extension

ALL VAT-MANDATORY DATA (§14 (4) UStG) SITS IN THE CORE – EXTENSIONS ARE A CONTRACTUAL ADD-ON, NOT A VAT REQUIREMENT

When is an e-invoice valid?

1

Schema (XSD)

Well-formed UBL 2.1 or CII D16B

2

EN 16931 business rules

Schematron: mandatory fields, totals, VAT breakdown, code lists

3

CIUS rules (if used)

XRechnung / Leitweg-ID: required for B2G, not for B2B

4

VAT content (§14 UStG)

Mandatory invoice particulars

Three error types (BMF, 15.10.2025)

- Format error (syntax / XSD) → not an e-invoice → input VAT deduction at risk
- Business rule error → still an e-invoice; no VAT impact if it concerns non-tax data (e.g. BT-10)
- Content error (§14 UStG particulars) → invoice correction
- ZUGFeRD hybrid: the XML prevails; MINIMUM and BASIC WL do not qualify

No central platform checks invoices in Germany – the receiver is the first to validate, and carries the VAT risk.

Peppol First: routing with evidence

1

Peppol ID known

Convert to a format the receiver has registered, send via Peppol.

2

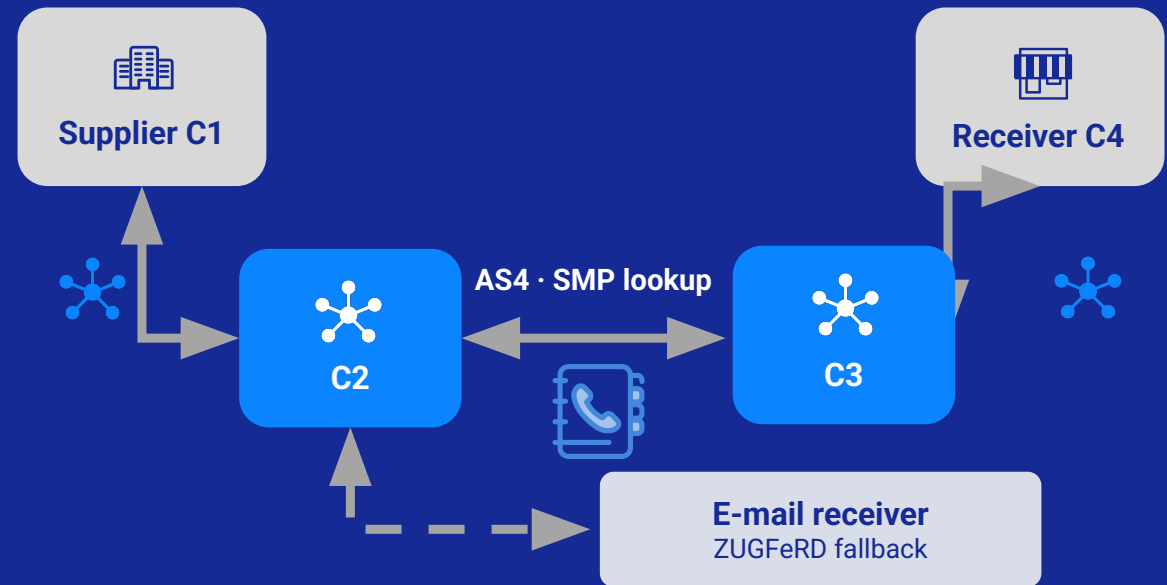
Automatic lookup

Query Peppol SML/SMP by VAT ID and other identifiers; check supported formats.

3

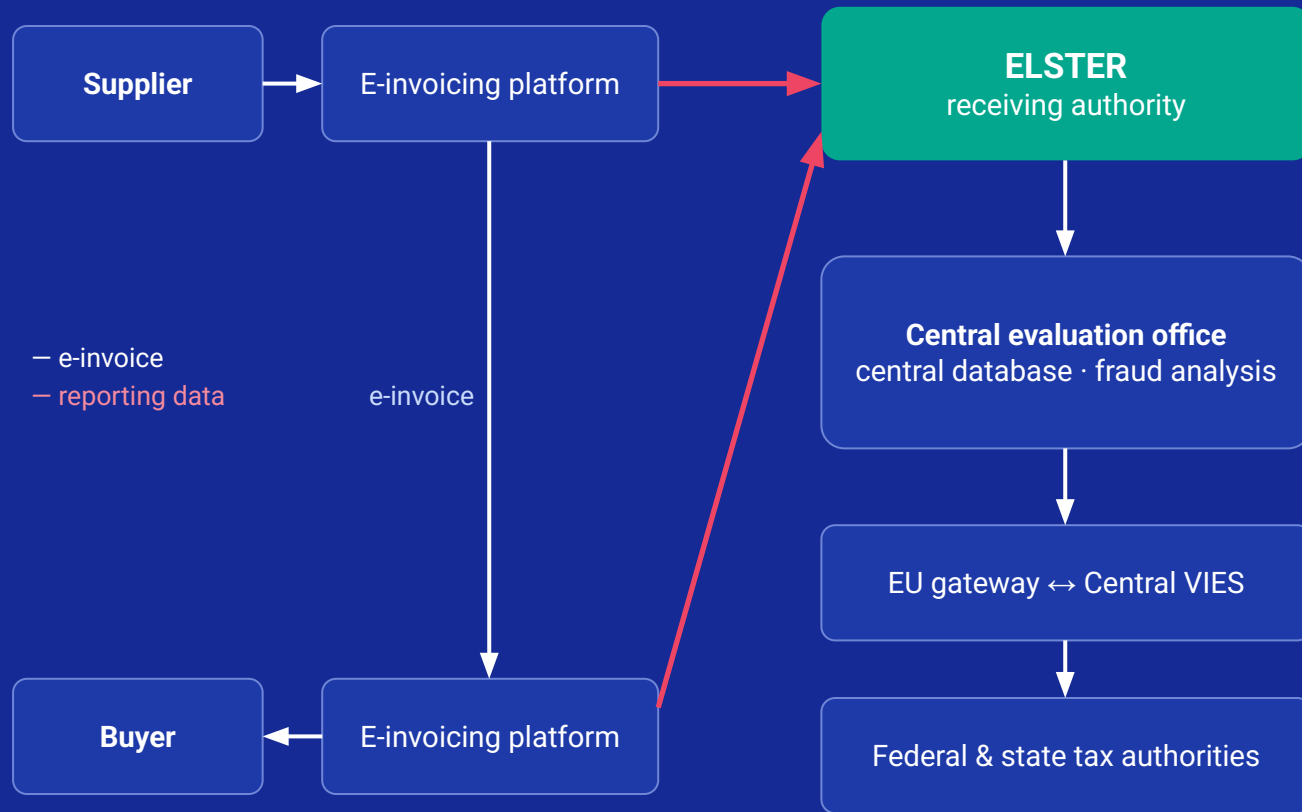
No participant found

Send the latest ZUGFeRD version by e-mail (fallback).



NO CHANNEL IS PRESCRIBED FOR B2B – PEPPOL FIRST IS OUR DEFAULT: DELIVERY EVIDENCE & STATUS (AS4 / MLS) · FORMAT MATCHED TO THE RECEIVER · READY FOR A “5TH CORNER”

Next step: German e-reporting & ViDA



PLANNED · NO LEGISLATION YET

Based on BMF presentation (2026), redrawn

ViDA – July 2030

- Intra-EU supplies: e-invoice + transaction-level reporting
- Recapitulative statement (ZM) abolished
- EN 16931 is the standard for cross-border invoices – a standard, not a format
- Reporting decoupled from transmission – you keep your channel

The invoice you send today is the reporting record of tomorrow.

Four takeaways



Validate all four layers

The receiver carries the input VAT risk.

Plan for new versions

XRechnung 4.0 won't be the last one.

Start the EDI gap analysis

2028 is one budget cycle away.

Build for reporting

Clean master data, unique IDs, a status trail per invoice.

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Thank You!

In case of any questions I am happy to be contacted directly:



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Analyst & E-Invoicing Expert

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Q & A



COMARCH

Developing the future





E-Invoicing Germany Legal Requirements

Mastering Germany's E-Invoicing Mandate
September 2026



Agenda

- 1 Introduction
- 2 Global e-invoicing landscape
- 3 Germany's timeline & legal deadlines
- 4 Legal framework: scope, formats & penalties
- 5 Archiving requirements (GoBD)
- 6 Practical challenges
- 7 PwC's implementation approach & best practice

Meet Your Speaker



Speaker

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Managerin



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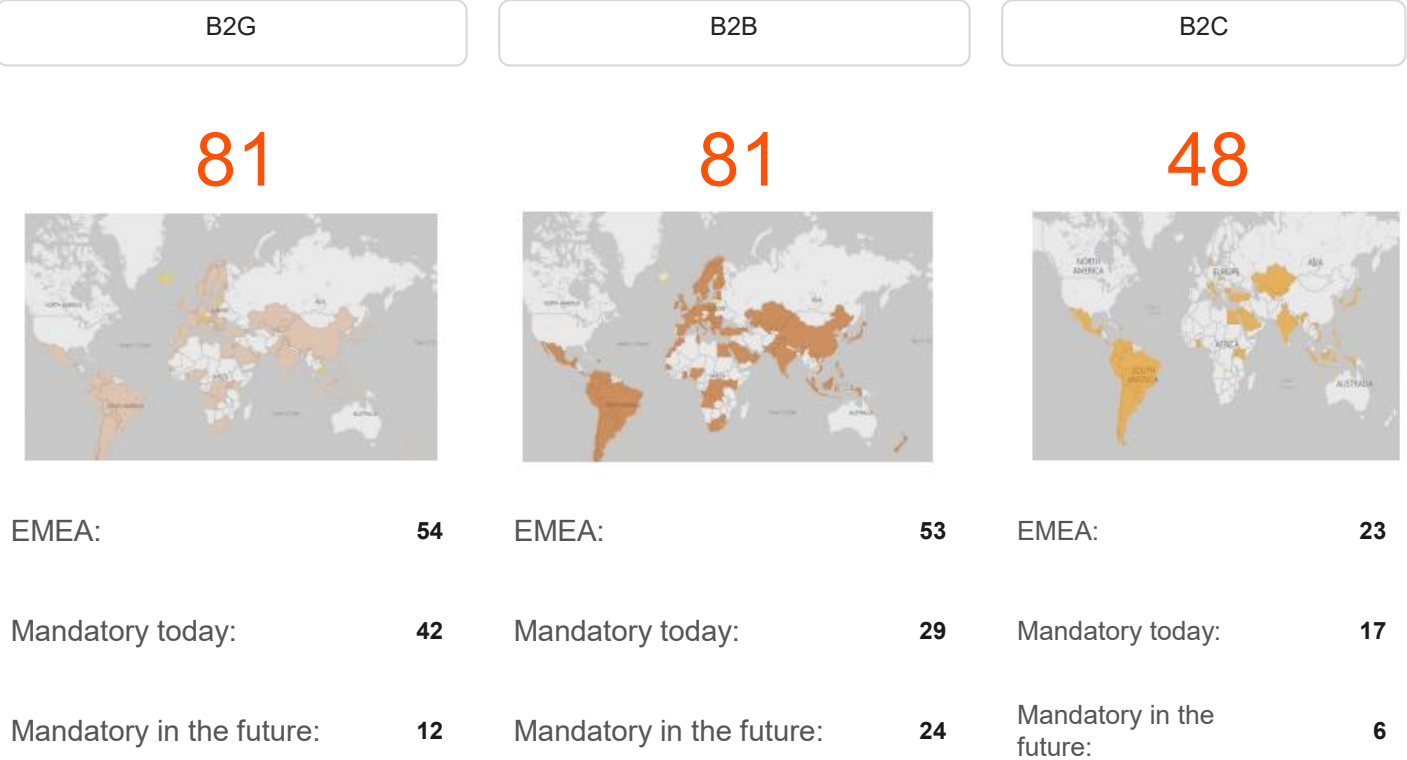
Today's Focus

A light gray world map is centered in the background. An orange location pin is placed in Central Europe, specifically over Germany. A semi-transparent gray rectangular box is positioned on the left side of the map, containing the word 'Germany' in orange text.

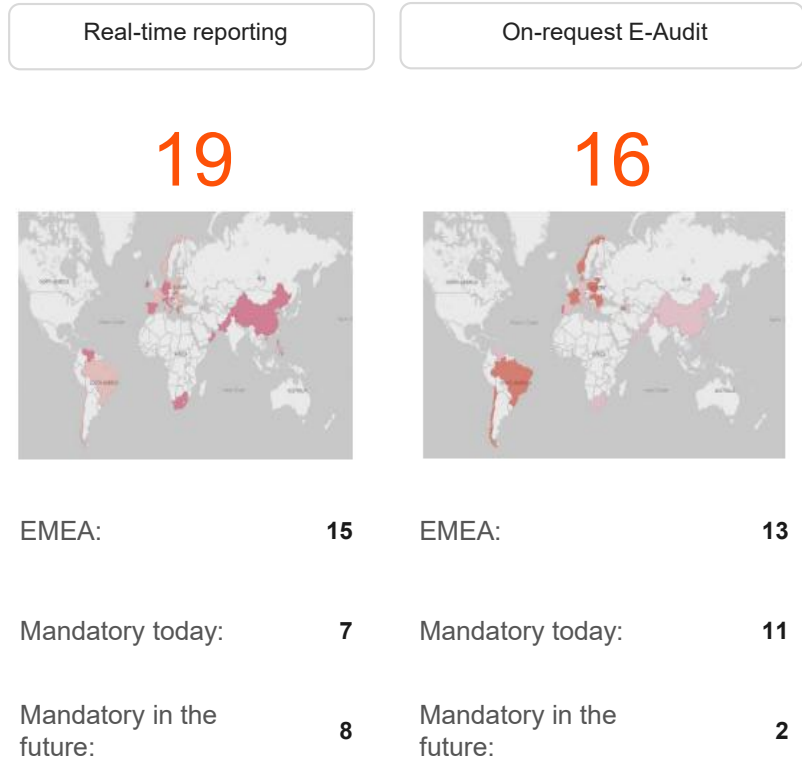
Germany

Global development in the area of e-invoicing/e-reporting

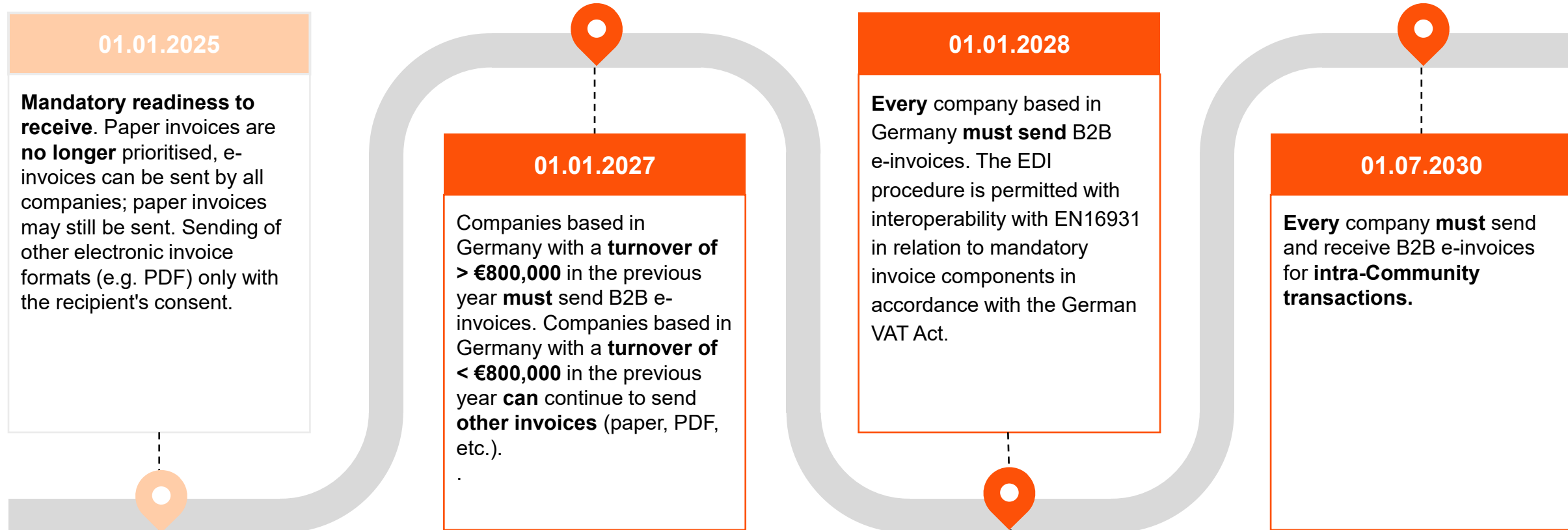
Mandatory electronic invoicing



E-Reporting



Germany's E-Invoicing Roadmap: Key Deadlines



Deep Dive (1/5): Who is Obligated & Exemptions

Who is obliged

→ All entrepreneurs based in Germany (including management or permanent establishments in Germany)

Which transactions

→ E-invoicing applies to both taxable and certain tax-exempt transactions (in accordance with Section 4 Nr. 1 - 7 of the German VAT Act (UStG)).

→ The following invoicing processes are also covered: self-billing invoice procedure, reverse charge, travel services, differential taxation

Exceptions

→ Small businesses (within the meaning of Section 19 UStG / Art. 282 VAT Directive) with a previous year's turnover of not more than EUR 25,000 and a turnover in the current year of less than EUR 100,000. If the threshold of EUR 100,000 is exceeded in the middle of the year, the small business regulation no longer applies. These thresholds are net values.

→ Small amount invoices: Small amount invoices not more than 250 EUR in accordance with Section 33 UStDV

→ Tickets: Tickets issued for the transport of persons in accordance with Section 34 UStDV

Deep Dive (2/5): Syntax & Penalties

Syntax

UBL 2.1 and CII D16B

Invoicing period

Within 6 months (invoices are usually issued earlier)

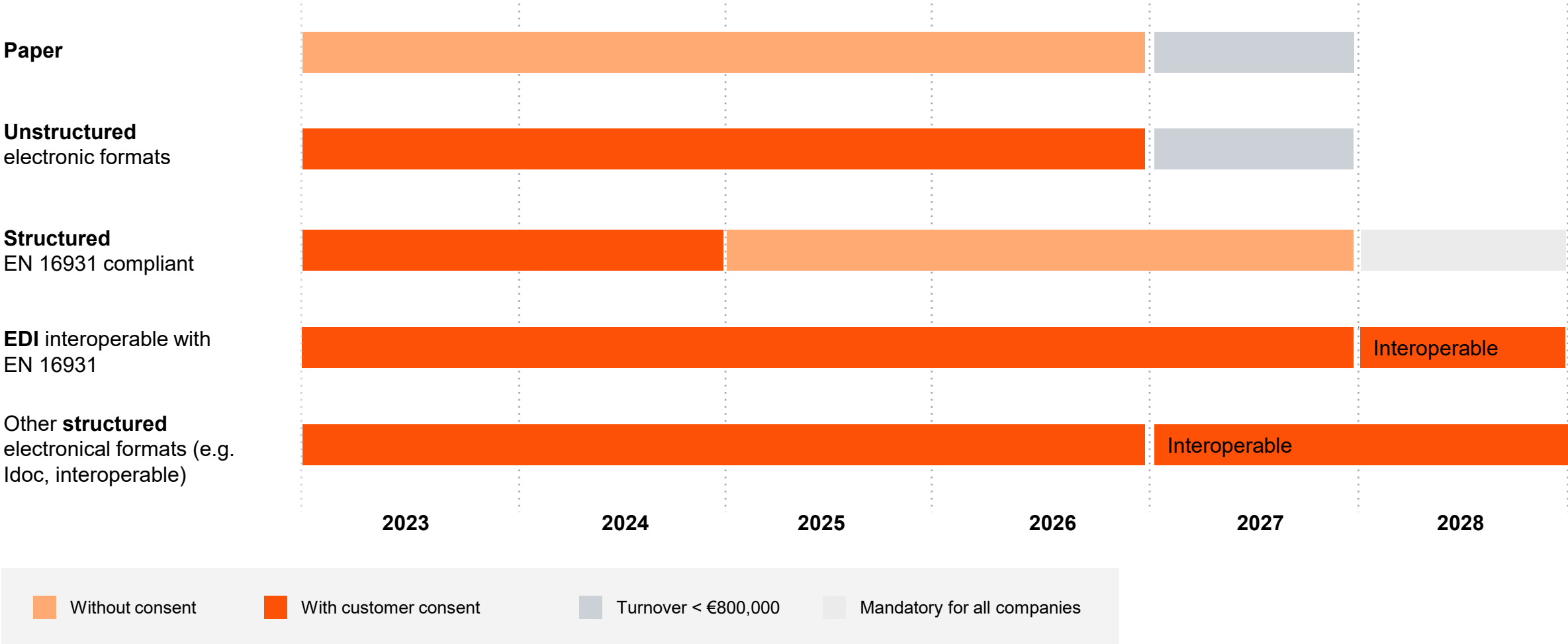
Possible penalties

Non-issuance an invoice: fine of up to EUR 5,000 (Section 26a UStG)

Non-recording or incorrect recording of invoices: fine of up to EUR 25,000 (Section 379 AO)

If the accuracy of the accounting is challenged: Tax auditors may estimate the assessment basis for all outstanding years in which the violation occurred (Section 162 AO)

Deep Dive (3/5): Accepted Formats & Transition Timeline



Deep Dive (4/5): What Qualifies as an E-Invoice?



Exchange of relevant invoice data in an (electronic) machine-readable structured format for fast and efficient processing



Human-readable

Unstructured format

INVOICE

CLIENT NAME

Saba Christos
sabadon@tiscali.com
0491 870 110
Gefellg. Country
123 Any Street
1000 2000

INVOICE #12345

Date: 08/11/202X

Service/Product	Description	Price	Quantity	Line Total
Service 1	Detailed description of item	\$120	1	\$120
Service 2	Detailed description of item	\$100	2	\$200
Service 3	Detailed description of item	\$180	1	\$180
SUBTOTAL				\$700
GST (10%)				\$70
TOTAL DUE				\$770

Example formats
PDF, Excel, Word

Manual processing



Human- and machine-readable

Hybrid format

XML Schema: `xmlns:xsi="http://www.w3.org/2001/XMLSchema"`
`xmlns:udt="urn:un:unece:uncefact:data:standard:UnqualifiedDataType:100"`

```
89 <ram:ExchangeDocumentContext>
90 <ram:BusinessProcessSpecifiedDocumentContextParameter>
91 <ram:ID>urn:fdc:peppol.eu:2017:poacc:billing:01:1.0</ram:ID>
92 </ram:BusinessProcessSpecifiedDocumentContextParameter>
93 <ram:GuidelineSpecifiedDocumentContextParameter>
94 <ram:ID>urn:cen.eu:en16931:2017#compliant#urn:xeinkauf.de:kosit:
95 </ram:GuidelineSpecifiedDocumentContextParameter>
96 </ram:ExchangeDocumentContext>
97 <ram:ExchangeDocument>
98 <ram:ID>471182</ram:ID>
99 <ram:TypeCode>388</ram:TypeCode>
100 <ram:IssueDateTime>
101 <udt:DateTimeString format="102">20241115</udt:DateTimeString>
102 </ram:IssueDateTime>
103 <ram:IncludedNote>
104 <ram:Content>Rechnung gemäß Bestellung vom 01.11.2024.</ram:Content>
105 </ram:IncludedNote>
106 <ram:IncludedNote>
107 <ram:Content>Lieferant: Lieferant GmbH
108 Lieferantenstraße 20
109 80333 München
110 Deutschland
111 Geschäftsführer: Hans Muster
112 Handelsregisternummer: H A 123
113 </ram:Content>
114 <ram:SubjectCode>REG</ram:SubjectCode>
```

Leistungserstellung

Rechnung-Nr.	Datum	Umsatz
1	01.11.2024	120,00
2	01.11.2024	200,00
3	01.11.2024	180,00

Handelsrechnung (REG) Nr. 471182 vom 15.11.2024

Umsatz	Netto	Brutto
500,00	450,00	500,00

Steuern und Abgaben:

Steuern	Abgaben
10%	50,00

Netto: 450,00

Brutto: 500,00

Steuern: 50,00

Abgaben: 50,00

Netto: 450,00

Brutto: 500,00

Steuern: 50,00

Abgaben: 50,00

Example formats
ZUGFeRD (PDF/A-3
with XML)

Machine processing



Machine-readable

Structured format

XML Schema: `xmlns:xsi="http://www.w3.org/2001/XMLSchema"`
`xmlns:udt="urn:un:unece:uncefact:data:standard:UnqualifiedDataType:100"`

```
89 <ram:ExchangeDocumentContext>
90 <ram:BusinessProcessSpecifiedDocumentContextParameter>
91 <ram:ID>urn:fdc:peppol.eu:2017:poacc:billing:01:1.0</ram:ID>
92 </ram:BusinessProcessSpecifiedDocumentContextParameter>
93 <ram:GuidelineSpecifiedDocumentContextParameter>
94 <ram:ID>urn:cen.eu:en16931:2017#compliant#urn:xeinkauf.de:kosit:xrechnung_3.0</ram:ID>
95 </ram:GuidelineSpecifiedDocumentContextParameter>
96 </ram:ExchangeDocumentContext>
97 <ram:ExchangeDocument>
98 <ram:ID>471182</ram:ID>
99 <ram:TypeCode>388</ram:TypeCode>
100 <ram:IssueDateTime>
101 <udt:DateTimeString format="102">20241115</udt:DateTimeString>
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103 <ram:IncludedNote>
104 <ram:Content>Rechnung gemäß Bestellung vom 01.11.2024.</ram:Content>
105 </ram:IncludedNote>
106 <ram:IncludedNote>
107 <ram:Content>Lieferant: Lieferant GmbH
108 Lieferantenstraße 20
109 80333 München
110 Deutschland
111 Geschäftsführer: Hans Muster
112 Handelsregisternummer: H A 123
113 </ram:Content>
114 <ram:SubjectCode>REG</ram:SubjectCode>
```

Example formats
XRechnung (XML UBL/CII)

Digression: The CEN standard 16931

Semantic data model:

Excerpt of the CEN standard 16931 (a total of approx. 160 business terms)

ID	Level	Business term	Data type
BT-1	+	Invoice number	Identifier
BT-2	+	Invoice issue date	Date
BT-7	+	VAT tax point date	Date
BG-4	+	SELLER	
BT-27	++	Seller name	Text
BT-31	++	Seller VAT identifier	Identifier
BG-5	++	SELLER ADDRESS	
BT-35	+++	Seller address line 1	Text
BG-25	+	INVOICE LINE	
BT-126	++	Invoice line identifier	Identifier
BT-129	++	Invoiced quantity	Quantity
BT-131	++	Invoice line net amount	Amount
BG-30	++	LINE VAT INFORMATION	
BT-152	+++	Invoiced item VAT rate	Percent
...	...	...	...

Firma B
Musterweg 100
10000 PARIS
FRANKREICH

Ihre USt-ID: FR123456789

Rechnung 123456789

DATUM	31.03.2028
REFERENZ	A526A83
TELEFON	+49 123 456 789
KONTAKT	SABINE@PWC.COM

Art. Nr.	Bezeichnung	Menge	Preis	Betrag	MwSt	*/**
1000001	Stuhl 524	5	100,00	500,00	0%	*
				500,00	=====	

```
<cac:AccountingSupplierParty>
  <cac:Party>
    <cbc:EndpointID schemeID="0088">7300010000001</cbc:EndpointID>
    <cac:PartyIdentification>
      <cbc:ID schemeID="0088">7300010000001</cbc:ID>
    </cac:PartyIdentification>
    <cac:PartyName>
      <cbc:Name>Firma B</cbc:Name>
    </cac:PartyName>
    <cac:PostalAddress>
      <cbc:StreetName>Musterweg 100</cbc:StreetName>
      <cbc:CityName>Paris</cbc:CityName>
      <cbc:PostalZone>10000</cbc:PostalZone>
    </cac:PostalAddress>
    <cac:AddressLine>
      <cbc:Line>Third address line</cbc:Line>
    </cac:AddressLine>
    <cac:Country>
      <cbc:IdentificationCode>FR</cbc:IdentificationCode>
    </cac:Country>
  </cac:Party>
  <cac:PartyTaxScheme>
    <cbc:CompanyID>FR123456789</cbc:CompanyID>
```

Example excerpt:
Syntax of an e-invoice

Deep Dive (5/5): Archiving & GoBD Compliance

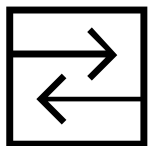
Archiving

The GoBD have not changed with regard to the new requirements for electronic invoicing. This means that the following principles must be adhered:

- Electronic archiving: Unalterable storage on machine-readable data carriers (Section 257 HGB).
- Proper and verifiable storage of documents (GoBD point 117).
- Data availability: readable and evaluable at any time (GoBD point 118).
- Retention obligation: Data may not be deleted before the expiry of the retention period or may only be stored in paper form (GoBD point 119).
- Format conversion: permitted as long as the data evaluability is preserved (GoBD point 131).

Practical Challenges in Implementation

Mandatory readiness to receive



- Technical validation and formal review for input VAT deduction
- Turn of year: ZUGFeRD vs. PDF

For preparation within the company



- Assessment of relevant invoice receipt and dispatch channels affected by e-invoicing requirements
- Implementation of a third-party solution vs. in-house implementation

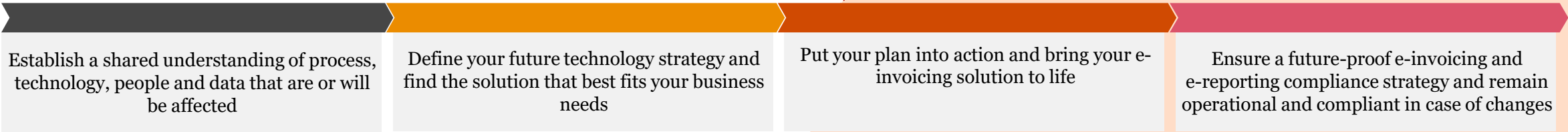
For existing electronic formats



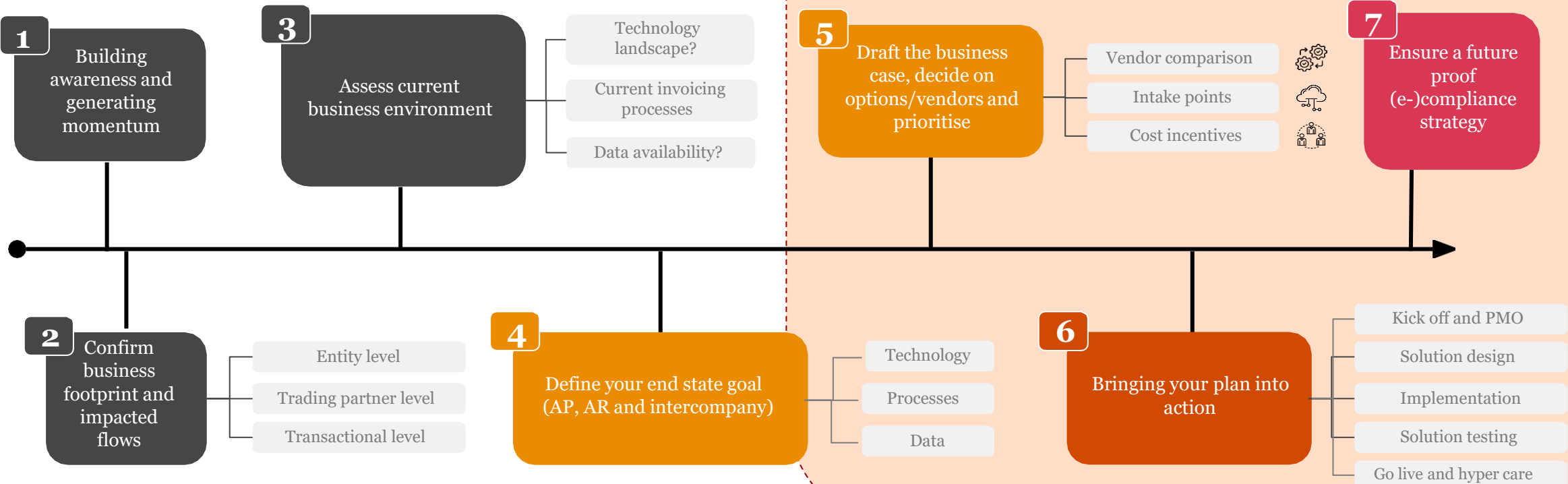
Interoperability check of existing structured electronic invoice formats (e.g. EDI, Idoc)



PwC's Phased & Modular Implementation Approach



Draft project plan



Working with our Alliance Partners

Best Practice: Key Questions to Get Started



Who is responsible for and who drives the e-invoicing initiative, and who within the company do I need for this?

How do you ensure that the solution can grow with your business and meet future needs?

How can I verify that we have the right data to meet the requirements and operate efficiently?

How can I adapt my tax controls and processes to ensure (nearly) real-time data exchange?

How can I integrate a solution provider while still keeping track of day-to-day operations?

How do I find a solution provider that's a good fit for my business?

Thank you