

COMARCH

WEBINAR E-INVOICING

Comarch x PwC



SPEAKERS



Ellen Cortvriend

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E-invoicing and E-reporting CoE Lead**

Ellen is a Partner in the ITX team in Belgium, with +15 years of experience in EU VAT, e-invoicing, e-archiving and e-reporting requirements. She is heading up the Centre of Excellence on global e-invoicing and e-reporting requirements, and has, within this capacity, been working on international projects with the Global PwC Network in over 100 countries.



Rafał Trojanowski

Analyst & e-Invoicing Expert at Comarch

Rafał is an analyst and head of the legal compliance team at Comarch. He specializes in carrying out data exchange and document management projects in countries where legal policies concerning e-invoicing were introduced.

Agenda

1

Deep Dive: The Belgian Peppol Go-Live Case Study (PwC)

2

Centralized vs. Decentralized: When the Polish KSeF Meets the Croatian 5-Corner Model (Comarch)

3

Key Takeaways & Roadmap to Success: What's Next? (PwC & Comarch)



Deep dive: the Belgian Go-live Case Study

An analysis of the Belgian mandate: lessons learned, implementation hurdles, and how the Peppol framework is reshaping the local landscape



Recap: the Belgian B2B e-invoicing obligation

As from **1 January 2026** the issuance and receipt of **structured electronic invoices** are mandatory for certain B2B transactions ('big bang' roll-out).

Peppol is the **default standard** for exchanging structured electronic invoices, but some (limited) flexibility will be offered provided there is agreement between the parties.

The issuance of paper invoices, or invoices in other unstructured formats (e.g. pdf) are longer be possible, for transactions in scope of the mandate.

The mandatory e-invoicing obligation will be complemented by an **e-reporting obligation** (real-time data sharing with the tax authorities) as from 2028. Legislation on the e-reporting obligation is not yet available.



Short-term and long-term vision on e-invoicing & e-reporting

Structured e-invoicing transmission

A.

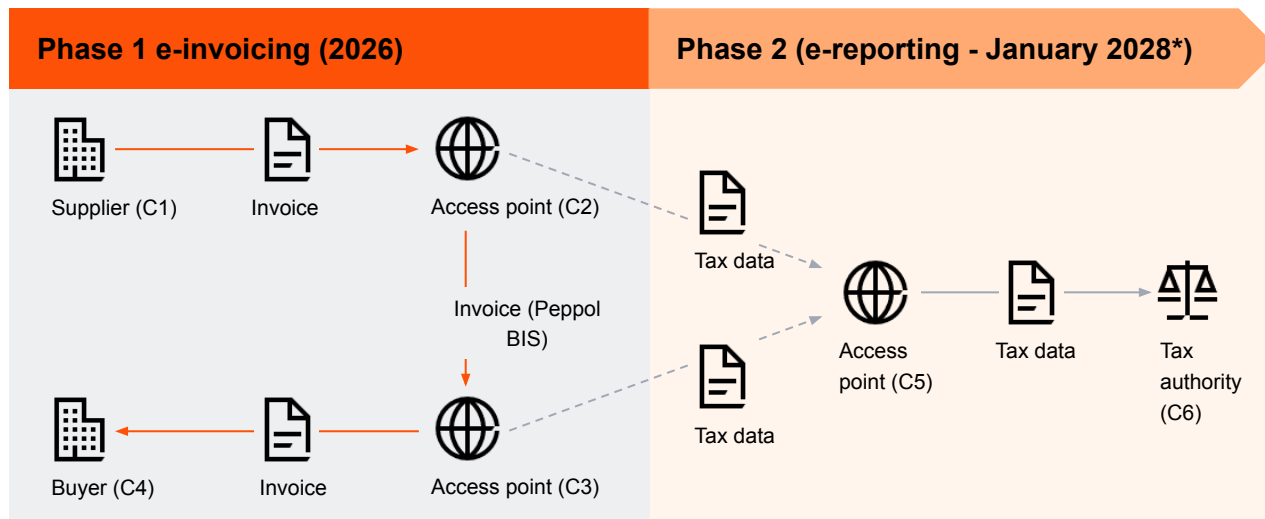
To increase interoperability, **Peppol** is the **default standard**. Peppol is an existing international framework for e-procurement and e-invoicing. It facilitates the exchange of electronic business documents between trading partners ('Connect once, connect to all')

Businesses needed to decide how they will connect with the Peppol network. Multiple options are available.

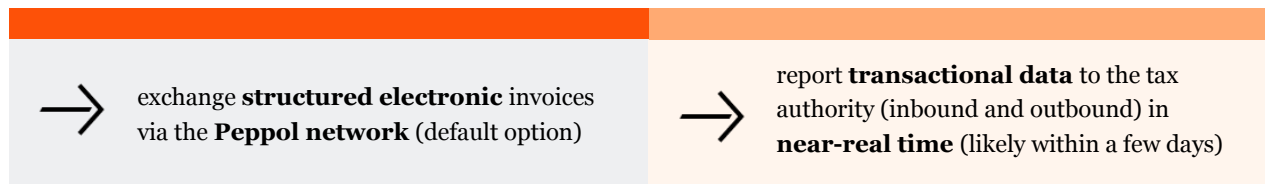
B.

Opt-out possible **upon mutual** agreement between supplier and buyer

- Compliance with 'European Norm' is required
- Transmission method not regulated



The majority of businesses operating in Belgium will be required to:



Recent changes

Tolerance period



The Belgian Tax Administration announced a **3-month grace period** until end of March (subject to conditions)

- You must prove you've taken **timely and reasonable steps** to comply
- Applies only to breaches specific to the new obligation, such as:
 - Missing technical capability to send/receive structured e-invoices
 - Unable to issue a valid e-invoice because your system (or e-invoicing provider) isn't ready
- **No general postponement!**

Lessons learned

Nine steps to future proof your e-invoicing compliance

1 Do not overestimate available time

Many businesses only started working on their Belgian e-invoicing deployment very closely to the deadline, expecting a delay

2 Align Tax, IT, Finance & Procurement

Cross-departmental collaboration & define clear objectives aligned with business goals

3 Select the right technology solutions

Many business went for a simple "transmission only" tool, therefore not grasping the full opportunity of a digital flow. Solution partner investing in proper KYC procedures is crucial.

4 Plan for multi-model complexity

To ensure scalability for the future roll-outs in other jurisdictions

5 Communicate with partners

Customer and supplier readiness and proper communication is key (also in view of the dual process during the grace period)

6 Check your data readiness

Implement a robust data management strategy with focus on ERP fields, codes, validation requirements

7 Monitor regulatory changes proactively

Dedicated compliance tracking

8 Prepare for AI integration

Data gathering, validation, anomaly detection

9 Plan for eReporting

The logical next step after e-invoicing

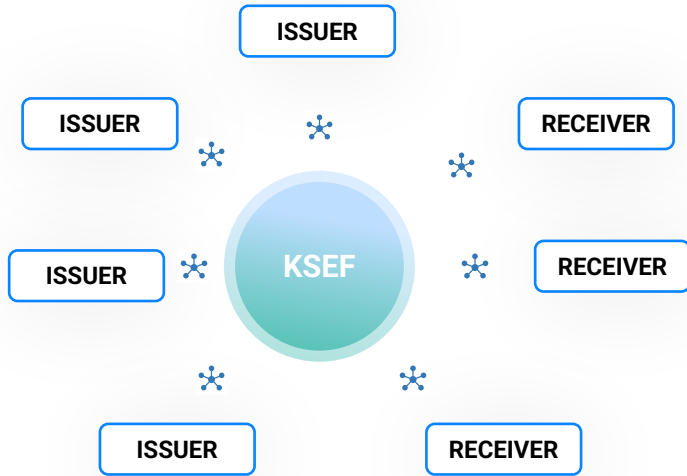
Bottom line: A proactive and centralized strategy reduces risk and cost across all jurisdictions.

Start now. The compliance window is shorter than you think.

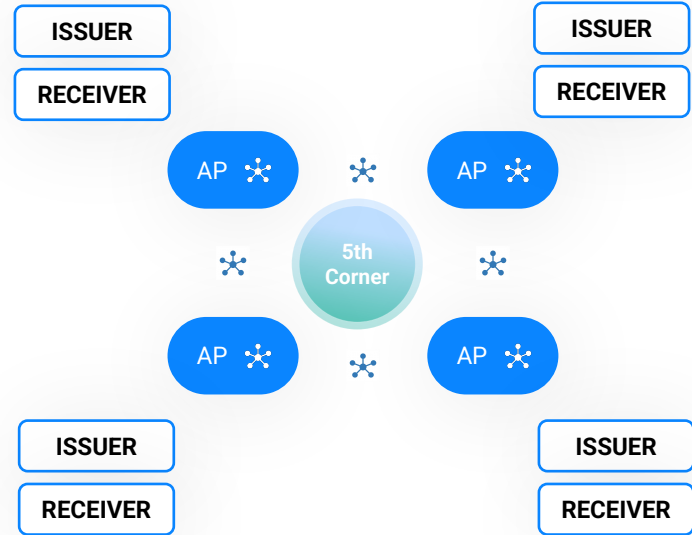


Centralised vs Decentralised

TWO COUNTRIES, TWO PARADIGMS



TRANSMISSION THROUGH CENTRAL HUB



REPORTING DECOUPLED FROM TRANSMISSION

Poland's KSeF – The Rigid Centralized Structure



Massive Scale at Go-Live: The numbers speak for themselves: in less than 48 hours, our Comarch EDI KSeF platform has already successfully processed **over 100,000 invoices** through the new system.



The Single Hub: Every invoice must **successfully pass through the governmental KSeF platform** to enter **legal circulation** and receive its unique KSeF ID.



Strict Structural Compliance: The platform strictly enforces schema versions, rejecting structural inconsistencies upfront before they can reach the buyer.



Configuration: Success heavily depends on exacting configuration; businesses cannot receive or send documents if their credentials or 'Receiving Profiles' are not flawlessly set up.

AUTHORIZATION METHODS



Trusted profiles



Qualified signature



Qualified seal



KSEF Certificate generated after 1st authentication



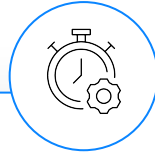
KSEF Token – string generated after 1st authentication

CROATIA'S 5 CORNER MODEL



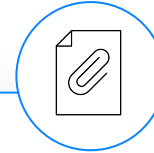
DECENTRALIZED EXCHANGE

Invoices bypass a central clearance hub entirely and travel directly between the buyer's and seller's chosen Information Intermediaries using a unified AS4 protocol



SEPARATION OF EXCHANGE AND FISCALIZATION

The e-invoice exchange is decoupled from tax reporting; both the sender and the receiver independently send fiscalization messages to the Tax Administration within 5 working days



AMS DIRECTORY DEPENDENCY

To route an invoice, IT providers must look up the recipient in the AMS (Address Book). If the buyer is not registered, the invoice simply cannot be routed. It is up to the taxpayer to confirm his provider in the fiscus portal.

The consequences of a Centralized Hub (Poland's KSeF):

- The single-node bottleneck (Performance Issues)
- Transition from voluntary to Mandatory (legacy lock-outs)
- Identity walls (authorization and configuration Issues)

GO LIVE TRENCHES

The interoperability traps of Decentralization (Croatian Fiskalizacija 2.0):

- The directory dependency
- The cross-verification design (mismatch handling)
- Dynamic government oversight (sudden validation updates need to be implemented by each provider)



REAL-WORLD IMPLEMENTATION HURDLES

POLAND

- The transition to the new FA(3) schema meant that perfectly valid invoices issued in the older FA(2) format right before the switch could no longer be downloaded
- The time required to download document packages spiked dramatically for a short period
- Validation of KSEF are not enough in terms of data quality
- Invoice flow was frequently halted by permission/ authorization

CROATIA

- Delivery fails instantly if the partner is not registered
- Tax Authority introduced updated Schematron validators with very short notice
- Because the buyer and seller report to the tax authority independently, minor IT differences trigger mismatch statuses.
- Providers had to choose: loosen validation rules or maintaining consistency and data quality



TAKEAWAYS & ROADMAP

ROADMAP TO SUCCESS

- Mandates are not static, and initial rollouts are chaotic.
- While standard invoices might process smoothly, businesses often fail when encountering non-standard scenarios.
- Mandates evolve rapidly post-Go-Live, technical changes can happen overnight












- Partner with your provider to establish a "Hypercare" phase immediately following the Go-Live
- Do not just test the happy path. Design and test specific workflows for complex scenarios.
- Do not panic over initial rejections, but prepare your operations for continuous change.



What's next? Practical learnings from recently introduced mandates

What's next: Global landscape at a glance

January

-  **Belgium** – B2B e-invoicing mandate
 -  **Croatia** – B2B e-invoicing mandate
 -  **Israel** – B2B e-invoicing (phase 3 & 4)
 -  **Latvia** – B2G e-invoicing
 -  **Malaysia** - B2B/B2G e-invoicing (taxpayers with an annual turnover or revenue of up to MYR 5 million)
 -  **Bulgaria** - SAF-T large taxpayers
- ## February
-  **Poland** – B2B/B2G e-invoicing (wave 1)
- ## March
-  **Poland** – SAF-T file for CIT and Fixed Assets
 -  **Greece** - B2B e-invoicing (phase A) - Grace period extended to 03/05/2026

2026

January

-  **Germany** – B2B e-invoicing (large Taxpayers)
-  **Slovakia** - B2B /B2G e-invoicing for Slovakian taxpayers and Digital reporting (domestic)
-  **Estonia** - B2B e-invoicing
-  **Croatia** - (Envisaged) B2B e-invoicing mandate (phase 2)
-  **UAE** - B2B eInvoicing Businesses with revenue ≥ AED 50M
-  **New Zealand** – B2G eInvoicing for large companies


2027

January


-  **Germany** – B2B e-invoicing all taxpayers
 -  **Belgium** – Real-time reporting (TBC)
 -  **Slovenia** – B2B e-invoicing
 -  **Latvia** – B2B e-invoicing
 -  **Norway** - (Envisaged) B2B e-invoicing mandate
- ## Month unknown
-  **Portugal** - Accounting SAF-T
 -  **Spain** – (Envisaged) B2B e-invoicing (timing TBC)

2028

April

-  **UK** - Mandatory B2B & B2G eInvoicing

November

-  **Ireland** - Mandatory eInvoicing & RTR for all VAT-registered businesses engaged in cross-border EU B2B transactions (domestic transactions only)




2029

July

-  **EU** – E-invoicing becomes the norm for all B2G and B2B transactions
-  **EU** – DDR for intra-community transactions
-  **Ireland** - Mandatory eInvoicing & RTR for all cross-border EU B2B transactions
-  **Slovakia** - B2B /B2G cross-border e-invoicing

2030


April

-  **Poland** – B2B/B2G e-invoicing (wave 2)**
 -  **Singapore** – B2B e-invoicing for all new voluntary GST-registrants
- ## May
-  **Dominican Republic** – B2B/B2G/B2C e-invoicing (small, micro and unclassified taxpayers)

June

-  **Israel** – B2B e-invoicing (phase 5, final)


July

-  **Malaysia** - B2B/B2G e-invoicing (new businesses or operations commencing from the year 2023 to 2025 with an annual turnover or revenue higher than MYR 1 million***)


Augustus

-  **Oman** - B2B eInvoicing (phase 1- 100 targeted taxpayers)

September

-  **France** – B2B (phase1) & eReporting


October

-  **Greece** - B2B e-invoicing (phase B)


December

-  **Philippines** - B2B/B2C/B2G e-invoicing


February

-  **Oman** - B2B eInvoicing large VAT registered businesses-


July

-  **UAE** - B2B eInvoicing Businesses with revenue < AED 50M

August

-  **Oman** - B2B eInvoicing all remaining VAT registered businesses


September

-  **France** – B2B (phase 2) & eReporting

October

-  **UAE** - B2G e-invoicing

November

-  **Ireland** - Mandatory B2B eInvoicing & RTR for large VAT-registered corporates (domestic transactions only) & AP obligation

LEGEND

- B2B:** Mandatory B2B e-invoicing
- B2C:** Mandatory B2C e-invoicing
- B2G:** Mandatory B2G e-invoicing
- On:** on-request e-audit
- RTR:** real time reporting

* This overview is purely indicative, non-exhaustive and subject to change. PwC – February 2026

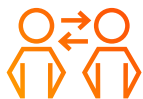
** Please note that, for the smallest “digitally excluded” taxpayers, whose transactions involve small amounts the mandate will only become applicable as of 1 January 2027

***For new businesses or operations commencing from year 2026 onwards, the

e-Invoice implementation date is 1 July 2026. However, if the first year’s turnover or revenue is less than MYR 1 million the e-Invoice implementation date would be 1 January in the second year following the year in which the total annual turnover or revenue reached MYR 1 million.



Practical insights & lessons learned



Impact on people

- eInvoicing impacts multiple departments (IT, Finance, Tax (AP/AR), Legal etc) - cross departmental collaboration is needed!
- Indirect tax department is not always involved in all relevant IT projects, leading to compliance gaps;
- Make sure that changes in Regulations are proactively monitored by a dedicated team;
- Combination of tax knowledge and AI¹ is becoming essential. By combining the right technology with skilled people and effective processes, compliance is transformed into a driver for confident, accurate, and timely data-led reporting;



Impact on systems & processes

- Consider your system strategy carefully, Direct connection vs. service provider, single vs. multiple Access Points, and future scalability;
- Don't assume your ERP or accounting system will provide a complete solution, vendor selection requires careful evaluation by businesses;
- Avoid "one-size-fits-all": when choosing a vendor, evaluate multi-country coverage vs. Local depth;
- Don't underestimate the implementation and maintenance costs;
- Don't underestimate the AP impact, accounts payable requires significant workflow changes;
- Don't forget about intercompany transactions;
- Sometimes integration with tax authority systems is required depending on the model applicable in each country, Plan for direct connectivity and API integrations with government platforms;
- Plan for system failures and fallback procedures: What happens when the e-invoicing platform or government system is down?
- Broader tax technology reform: Invest in unified AI tools that empower you to proactively check data quality across jurisdictions, anticipate challenges before they arise, and ensure readiness for eInvoicing/real-time reporting.

Practical insights & lessons learned



Impact supply chain

- Segment trading partners by capability and volume — tailor your approach: large partners adopt quickly, while small/medium partners may struggle with technology;
- Trading partners may not be ready/aware of the mandate — Proactive communication is essential;
- Foreign suppliers and customers may add complexity in specific countries;
- Some customers/suppliers may be exempt from the mandate;
- Specific for Belgium: Peppol opt-out possibility, but businesses must still be capable of sending/receiving invoices via Peppol!

The increasing volume of data needed

Corporate Income Tax data	Withholding Tax data	CSRD data 1,000+ data points
Transfer Pricing data	VAT and E-invoicing data	Pillar Two data 280+ data points
Customs and Trade data	Tax provision data	FSR data 170+ data points
Payroll data	State and local taxes data	CBAM data 400+ data points



Data at the center of compliance

- More data points are required — E-invoicing mandates typically require fields not currently captured in ERP systems;
- Unique codes, IDs, or QR codes may need to be added to invoices;
- Invoice validation with government platforms may be required before issuance;
- Consider pre-filled VAT returns — Tax authorities are moving towards automated reconciliation based on e-invoice data.

Contact details



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Q&A Session

Your Questions Answered

Scan the QR code to get the latest version of our **E-Invoicing Guide - Navigate Compliance in 75 Countries!**





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