E-Invoicing: Readiness to Implementation

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Important Timelines

1 Jul 2026	1 Oct 2026	30 Oct 2026	1 Jan 2027	31 Mar 2027	1 Jul 2027	1 Oct 2027
Pilot live	**FTA Decision No. 13 takes effect**	**ASP appointment**	**Phase 1 go-live**	**ASP appointment**	**Phase 2**	**Government**
Taxpayer Working Group exchanging live PINT-AE documents	Verification of supplier and supply before input tax	Revenue ≥ AED 50m (extended from 31 Jul)	Revenue ≥ AED 50m, issuing and receiving	Revenue < AED 50m and government entities	All remaining businesses except Government;	Government from 1 Oct 2027
	25 days to Decision 13	**55** days to ASP appointment	**118** days to Phase 1 go-live			

Live Poll Question

Have you completed E-Invoicing Gap Assessment?

- ❑ Yes
- ❑ No

Live Poll Question

Have you appointed ASP?

- ❑ Yes
- ❑ No

Readiness to Implementation

Awareness

- Peppol and the 5-corner model
- PINT-AE and the mandatory field set
- MD 243 / 244 phasing and timelines
- ASP accreditation and the list (43)

Readiness

- Revenue streams identified
- Tax-code mapping
- Data GAP assessment
- Selection of ASP
- Customer and Vendor KYC/Communication including Go-live date confirmation
- Project Plan

Design and Implementation

- ASP onboarding on EmaraTax
- Peppol ID creation
- Master-data clean-up
- Field-by-field mapping per ERP and document type
- A Business Requirement Document (BRD) which the ASP and IT needs
- Integration design (API vs SFTP, middleware, sequencing)
- UAT and Design Documents with tax sign-off
- Hypercare and first VAT-return reconciliation

How to Get Ready - Gap Assessment

e-Invoicing: Why Gap Assessment is Essential?

Current Invoicing process Vs E-Invoicing

- Mapping of existing fields in ERP against PINT-AE data dictionary fields;
- Data clean-up required for master data required

Review of tax positions

- Review of business transactions to validate appropriate tax treatment
- Ensure if correct documentation and Invoicing processes are in place

Mapping of Use Cases

- Essential to identify use case for each transaction;
- Decision-making on the inclusion of additional data fields at ERP level, data lake layer, or ASP platform.

Evaluate System Readiness

- Billing and ERP readiness for structured e-Invoicing (XML & real-time integration)

e-Invoicing: Data Fields Redefining Compliance

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Due date of payment

Date when payment is due (should be a fixed date in yyyy-mm-dd format)

Type of Goods or Services subject to RCM:

To be selected from specific list provided on PEPPOL

Tax exemption reason text

Reason mandatory for Exemption from Tax

Preceding Invoice Reference

Identification of Preceding Invoice Reference for Credit Note

Principle ID

TRN of the principle in case of disclosed agent billing

Credit note reason code

Reason Code to be selected from specific code list provided

HSN/SAC Requirement : Currently Optional Can be mandated in future

Invoice Type and VAT Category Codes

Code	AE VAT category codes	Name	Description	Dropdown values
380	S/Z	Commercial invoice	(1334) Document/message claiming payment for goods or services supplied under conditions agreed between seller and buyer	380-Commercial invoice
480	E/O	Invoice out of scope of tax	An invoice issued by a party who is out of the scope of tax regulations and shall not collect tax on the invoice. The invoice should not contain tax details or information about the party tax registrations.	480-Invoice out of scope of tax
381	S/Z	Credit note	(1113) Document/message for providing credit information to the relevant party.	381-Credit note
81	E/O	Credit note related to goods or services	Document message used to provide credit information related to a transaction for goods or services to the relevant party.	81-Credit note related to goods or services
389	S	Self-billed invoice	An invoice the invoice is producing instead of the seller.	389-Self-billed invoice
261	S	Self billed credit note	A document which indicates that the customer is claiming credit in a self billing environment.	261-Self billed credit note
NA		Supplies not subject to E Invoicing	Supplies where E Invoicing is not applicable (Eg Interest on Loan)	Not applicable

Transaction Type Codes

Code	Name/ Description
1XXXXXXX	Free trade zone (**position 1**) Supply of goods or services in Free trade zone
X1XXXXXX	Deemed supply (**position 2**) Supply of goods or services without consideration
XX1XXXXX	Profit Margin Scheme (**position 3**) Supply of goods under the profit margin scheme
XXX1XXXX	Summary invoice (**position 4**) Taxable person makes more than one supply of Goods or Services to the same person in the same calendar month
XXXX1XXX	Continuous Supply (**position 5**) Supply of goods and/or services made on recurrent basis
XXXXX1XX	Agent billing (**position 6**) Agent who is a registrant makes a supply on behalf of the principal
XXXXXX1X	Supply through E-commerce (**position 7**) Supply of goods or services via E-commerce
XXXXXXX1	Exports (**position 8**) Supply of goods or services outside the country

Other considerations

1 Participant Identifier (Peppol ID)

Peppol ID = 10-digit TIN (first 10 digits of the Corporate Tax TRN), formatted 0235:XXXXXXXXXX

2 Dummy endpoints for certain transactions

0235:9900000097 – deemed supply

0235:9900000098 - domestic B2B/B2G not yet onboarded

0235:9900000099 – exports where the buyer has no Peppol ID

3 New Identifiers

Entity type (B2B / B2G / B2C)
implementation phase
Transaction Type

4 Supplier and Customer KYC

Seller and Buyer details required as mandatory data fields
Impact of **Decision No. 13** on input tax recovery

e-Invoicing: Key Salient Considerations

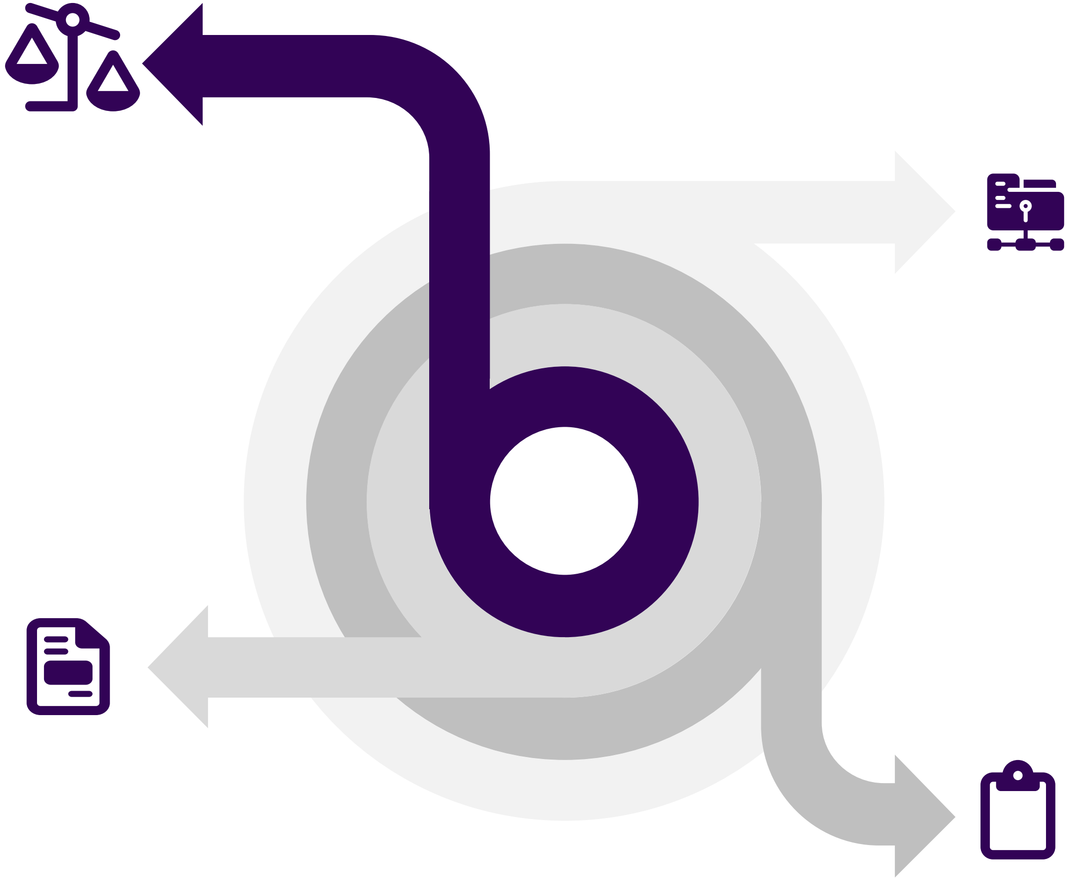
e-Invoicing: Alignment of Customers & Vendors

Changes in Customer and Vendor Onboarding Processes

Additional Details for new mandatory data fields. Delay in coordination can impact implementation

Tracking Non-e-Invoicing Documentation

Declarations from suppliers where no e-Invoices were issued to comply with Input VAT recovery conditions



Vendor Readiness

Communicate Vendors to ensure E invoicing readiness & change in contract clauses to prevent Input VAT loss

Government Entities

Go live from 1 October 2027. Segregation of transactions with Govt entities & process alignment required

Live Poll Question

Is your input credit at Risk after 1st October 2026?

- ❑ Yes
- ❑ No

FTA Decision No. 13 Linkage with E-invoicing

Effective 1 October 2026

Verifying the supplier and the supply on every first-time relationship and annually thereafter

Verify the supplier · Art. 3

- Maintain Identity and license
- Registered name, address, employees
- Real place of business
- Risk indicators: address / personnel changes, disproportionate volumes
- Bank and reputation check above AED 375k / 12 months

Verify the supply · Art. 4

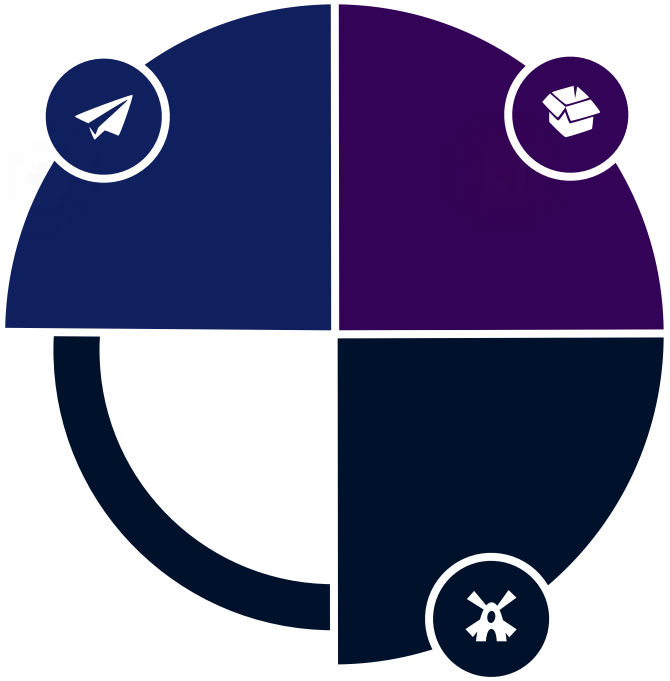
- Genuine commercial rationale
- Electronic payment trail; cash or offshore needs justification
- Price and margin not unexplainably off-market
- Goods, ownership and any intermediary's role

Thresholds & governance · Art. 6

- De minimis: supplies under AED 10,000 excl. VAT
- Void once a supplier passes AED 100,000 in 12 months
- A documented policy naming owner, reviewer and supervisor is itself mandatory

e-Invoicing Implementation

Data Integration Modes



- API via ASP connector
- SFTP
- Excel Upload / Data Entry at ASP Platform

Considerations at Implementation

Dual systems and parallel runs
E-invoicing and conventional PDF invoicing coexist across phases and counterparties

Credit notes against pre-go-live invoices
No preceding e-invoice exists to link to, decide the coding and reference rule now

Handling downtime at peak
High-volume windows and API failures; fallback rules decided in advance, not on the day

Input VAT recovery disruption
Supplier e-invoices delayed during initial adoption

Reconciliation
Three-way reconciliation, weekly: e-invoice register vs ASP transmission log vs VAT return working

Rejection at ASP Level
XML Validation failure

Live Poll Question

Do you know what happens to your data after Corner 5?

- ❑ Yes
- ❑ No

e-Invoicing : What Happens to Your Data After Corner 5?

Tax Authorities have a broader objective to leverage e-Invoicing data or monitoring the following domains

e-Invoicing data

Central Data Platform

Collect, Process and store
The data received from Corner 2 and Corner 3 will be processed

VAT Registration	Verify accuracy, threshold compliance, and effective registration dates to maintain regulatory adherence.
VAT Returns/Refunds	VAT reporting verification, variance analysis and utilizing insights while processing refund requests.
Taxable person data	Validation of taxable person data and developing indicators for detailed segmentation and analysis.
Audit Sampling	Analysis based on pre-defined set of data parameters.
Macro-Economic Performance Metrics	Data analysis based on actual real-time data for trend, sectoral developments etc.
Micro-Economic Performance Metrics	Analysis of liquidity &credit risks, pricing and cost structure shifts for margin and competitiveness insights,

Implementation Key Success Factors

UAT Testing (User Acceptance Testing)

- Validate end-to-end invoice flows (AP, AR, Credit Notes).
- Test ERP integration, data accuracy, and reporting requirements.
- Ensure business users sign off before deployment.

Training & Awareness

- Conduct role-based training for Finance, Tax, Procurement, and IT teams.
- Create awareness on new invoicing processes and compliance requirements.
- Provide quick reference guides and FAQs.

SOPs & Governance

- Update Standard Operating Procedures (SOPs) to reflect e-Invoicing processes.
- Define roles, responsibilities, controls, and exception handling.
- Establish governance for ongoing compliance monitoring.

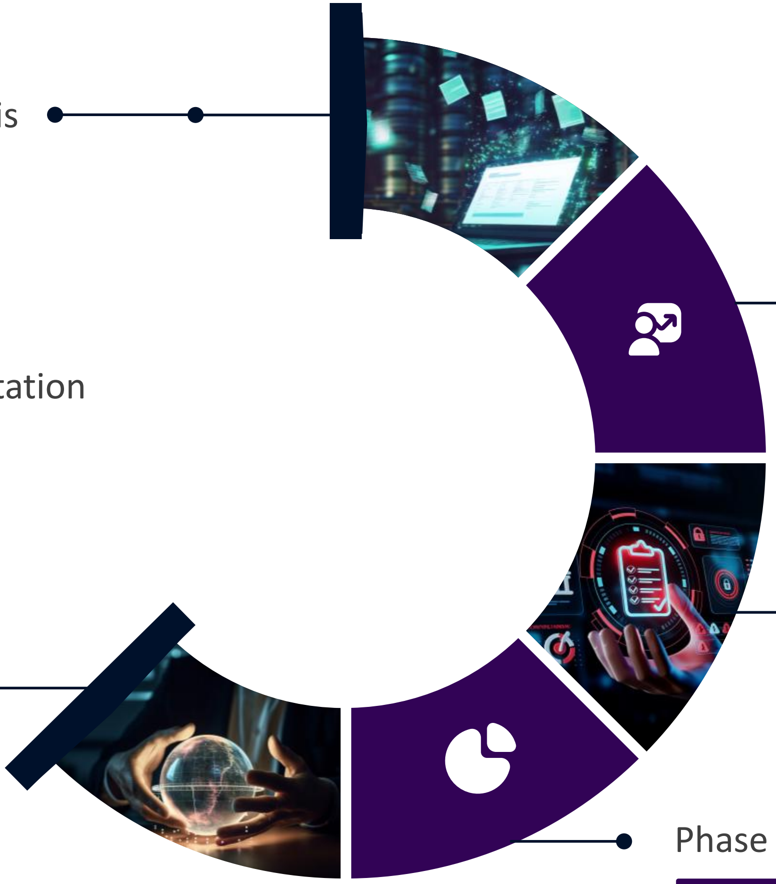
Go-Live Readiness

- Complete data validation and master data checks.
- Confirm system configurations, integrations, and contingency plans.
- Obtain business and IT readiness sign-off.

Hypercare Support

- Dedicated support team during initial weeks post go-live.
- Monitor invoice transmission, errors, and user issues.
- Track KPIs and implement quick fixes to stabilize operations.

e-Invoicing : Implementation Life Cycle



Phase 1 : Impact Assessment and Gap Analysis

6 – 8 Weeks

Phase 2 : Integration Design and Development

8 – 12 Weeks

Phase 3 : Testing and Validation

2 – 3 Weeks

Phase 4: Training and Documentation

2 – 3 Weeks

Phase 5: Post-Implementation Support

On-going

The overall duration of the project is expected to be approximately 6 to 8 months.

Live Poll Question

Which stage best describes your business's current progress?

- ❑ Identified Gaps
- ❑ Fixing Data Fields
- ❑ ASP Integration
- ❑ UAT Testing / Pilot Run

Thank You

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