# E-INVOICING



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## **About E-Invoicing**



## **INTRODUCTION TO E-INVOICING IN UAE**

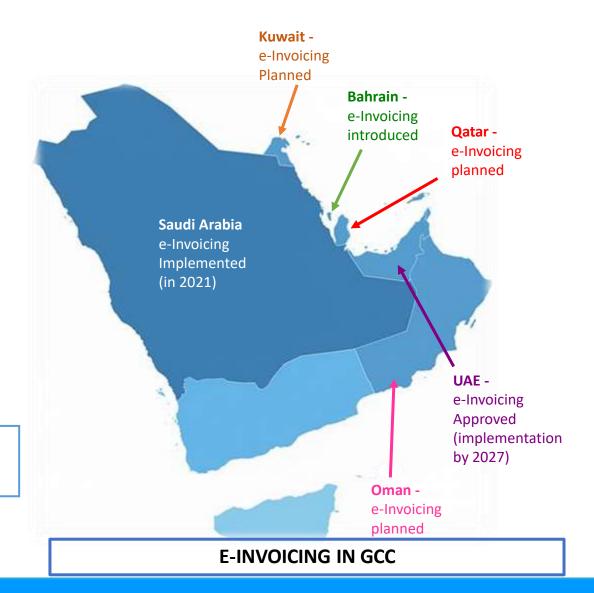


E-Invoicing is the **electronic exchange** of invoices between suppliers and buyers in a structured machine-readable XML format enabling automatic processing by business systems.

Governments worldwide (over 80 countries) are adopting structured **digital invoicing models** that allow real-time transaction reporting and data sharing between businesses and tax authorities.

In the GCC region **Saudi Arabia** has successfully implemented e-Invoicing in **two phases** since 2021 **UAE is the** next mover. **Bahrain & Oman** introduced it as part of its VAT framework.

Faster processing, secure data exchange and environmentally sustainable paperless operations contributing to **improved business productivity** and a **more resilient digital economy**.





## E-INVOICING FRAMEWORK: PEPPOL BASED 5 CORNER MODEL



1. Supplier

2. Supplier's ASP

The UAE has adopted the **Peppol network** as the foundation of its national e Invoicing system aligning with more than **40 countries** that use Peppol for standardized digital trade — including Singapore, Australia, New Zealand, Norway, Sweden Finland and Belgium.

3. Buyer's ASP

The UAE's **5-Corner Model** builds on the global Peppol architecture by introducing a **fifth participant** — the Federal Tax Authority (FTA). The five entities involved are the Supplier, Supplier's Accredited Service Provider (ASP), Buyer's ASP, Buyer and the FTA all connected through the **AS4 secure communication protocol** under Peppol standards.

4. Buyer

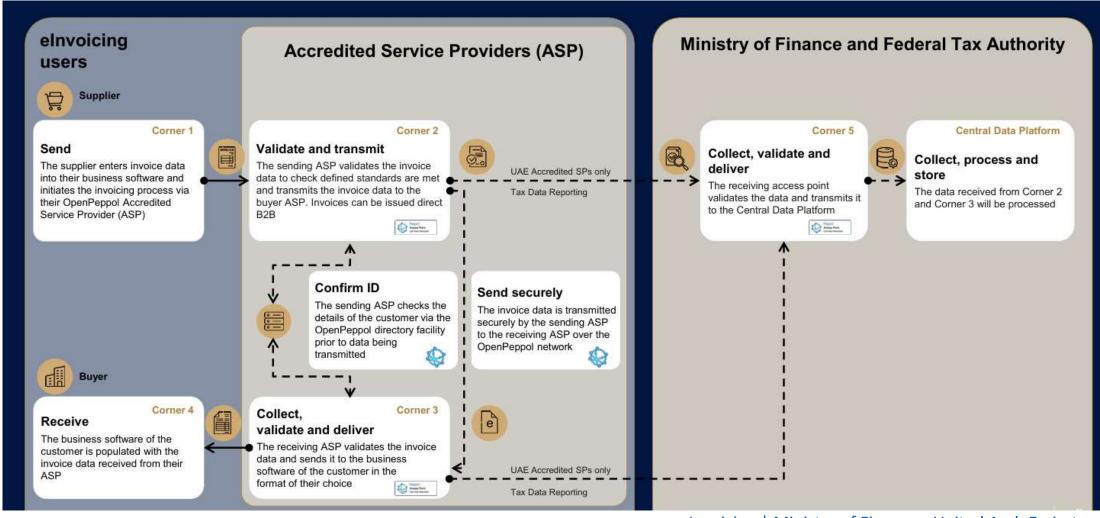
5. FTA (Federal Tax Authority)

In essence the UAE's Five-Corner Model is **unique globally** because it blends Peppol's decentralized efficiency with real time tax control creating a hybrid system that balances privacy automation and regulatory transparency — **setting a new regional benchmark** for digital tax ecosystems. It enables the FTA to access aggregated tax data in real time supporting advanced data analytics risk-based audit selection and VAT pre-filling capabilities in the future.



## PROCESS FLOW OF E-INVOICING IN 5 CORNER MODEL





elnvoicing | Ministry of Finance - United Arab Emirates



### **IMPLEMENTATION TIMELINE**



The e-Invoicing system applies to all Person (natural person or juridical person) engaged in Business-to-Business (B2B) and Business-to-Government (B2G) transactions. Transactions related to sovereign activities, international passenger transport and exempt financial services are excluded from the scope. Business-to-Consumer (B2C) transactions are currently excluded but may be incorporated in later phases of implementation.

The pilot phase of e-Invoicing will launch on **1 July 2026** and voluntary early adoption is encouraged. All taxpayers are required to onboard an Accredited Service Provider (ASP) and complete system testing and integration before their applicable go-live date.

Category	ASP Appointment Deadline	Mandatory Go-Live Date
Large Businesses (Revenue ≥ AED 50 million)	31 July 2026	1 January 2027
Other Businesses (Revenue < AED 50 million)	31 March 2027	1 July 2027
Government Entities	31 March 2027	1 October 2027

Nov	Dec	Jan	Feb	Mar	Jun	Jul	Dec	Jan	Feb	Mar	Jun	Jul	Sep	Oct
2025	2025	2026	2026	2026	2026	2026	2026	2027	2027	2027	2027	2027	2027	2027





## **About Accredited Service Providers**



## **ACCREDITED SERVICE PROVIDERS (ASPS)**



Peppol facilitates the secure exchange of electronic documents **through certified "access points."** In the UAE framework these access points are operated by Ministry of Finance—accredited Service Providers (ASPs).

Under Ministerial Decision No. 64 of 2025 ASPs must hold Peppol certification ISO 22301 compliance and local data hosting. Only ASPs on the official accreditation register can process and transmit e-Invoices within the UAE system. Preapproved list of ASP are mentioned as below:

- 1. Comarch Middle East FZ LLC
- 2. Cygnet Digital IT Solutions L.L.C
- 3. Defmacro Software DMCC
- 4. Deloitte & Touch M.E.
- 5. Flick Network L.L.C
- 6. Oxinus Holding Limited
- 7. Pagero Gulf FZ-LLC
- 8. Skill Quotient Technologies
- 9. SunTec (Xelerate) Business Solutions DMCC

Peppol = network ASP = your gateway

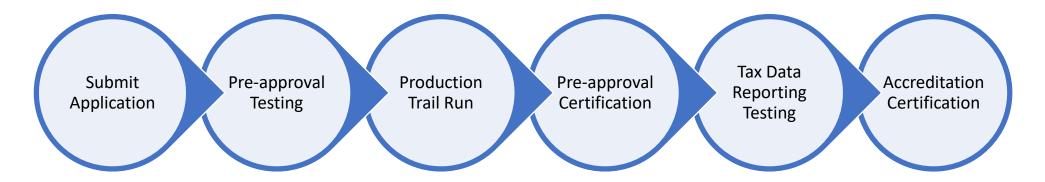
Some of the Service Providers (SPs) are still in the process of obtaining accreditation from the FTA. The accreditation process takes approximately 90 days and we expect to have the final list of Accredited Service Providers (ASPs) by the end of December 2025.



## **ACCREDITATION OF E-INVOICING SERVICE PROVIDES**



The UAE ASP accreditation process is rigorous transparent technically intensive and credibility-driven designed to ensure only qualified secure and reliable service providers participate in the national e-Invoicing ecosystem.



To qualify for accreditation under the UAE Electronic Invoicing System a Service Provider must be Peppol-certified have at least two years of e-invoicing experience and be a registered legal entity in the UAE (or a licensed foreign entity) with a minimum paid-up capital of AED 50000 and ISO 22301 Business Continuity certification.

It must comply with the UAE PINT AE and Peppol Interoperability Framework hold valid Corporate Tax and VAT registrations and meet strict information security standards covering multifactor authentication encryption and system integrity.

Applicants must also submit a self-declaration of compliance and maintain professional indemnity cybersecurity and business continuity insurance. The Minister of Finance may waive specific conditions. Supporting documents include certification financials ISO proof tax registrations and insurance policies.





## **About IT Requirement**



## IT REQUIREMENTS FOR E-INVOICING



A strong and compliant IT foundation is critical for the successful implementation of e-invoicing. By ensuring system compatibility with UAE PINT AE standards, integrating securely with ASP and maintaining robust data protection and continuity measures, businesses can achieve seamless, compliant and efficient e-invoicing operations. A well-prepared IT infrastructure not only supports regulatory compliance but also enhances automation, transparency and long-term digital transformation within the organization.

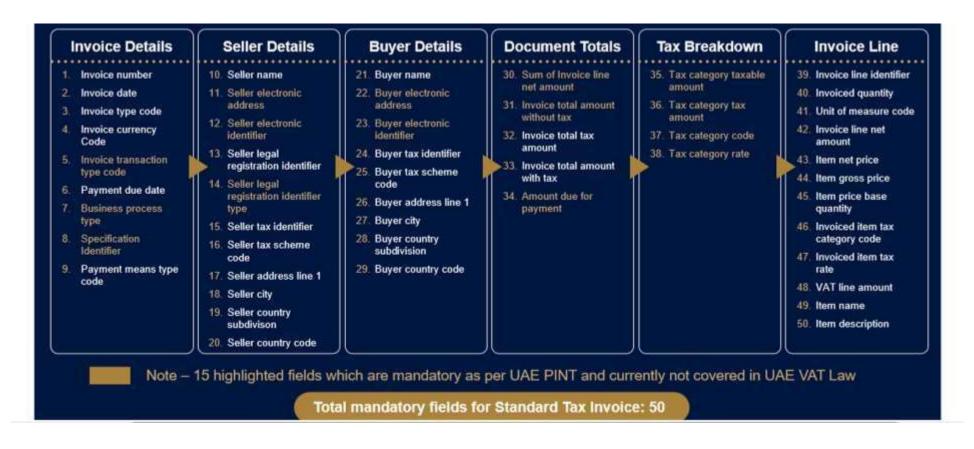
**ASP Integration (API/SFTP)** XML/UBL (PINT AE) Support 50 plus mandatory fields **Digital Signing & Encryption Continuous Monitoring Archival System Data Residency within UAE** 



### **50 MANDATORY DATA POINTS FOR E-INVOICING**



These fields must be present in every valid e-Invoice issued through the UAE e-Invoicing System (XML/UBL 2.1 format)



These 50 fields are mandatory or conditionally mandatory depending on the transaction type (B2B/B2G). In commercial e-invoice point no. 48 (VAT line amount) is not required. Optional fields (like discount, additional charges, delivery terms, references, etc.) can be included but are not compulsory. All data must conform to the UAE PINT AE schema and validation rules established by the UAE Peppol Authority and FTA.







- Conduct GAP Analysis ERP readiness, data quality, and workflows
  - Select and contract with an FTA-accredited ASP
- Integrate ERP/accounting systems with ASP (API, SFTP, or manual upload)
  - Cleanse and update master data (TRN, TIN, buyer/supplier details)
    - Configure invoice templates to capture 50+ mandatory fields
      - Implement digital signing and encryption tools
  - Establish archiving system to store XML & PDF copies for 7 years
    - Train finance, IT, sales, and procurement teams
    - Test invoices in pilot phase with ASP and FTA sandbox
- Communicate with vendors/customers about e-invoicing requirements





## Mostly asked FAQs



## **FAQs**



#### Q. Can a business still send a PDF invoice by email?

The PDF may be sent for reference, but issuance and exchange must happen via the structured e-invoice format and ASP network

#### Q. Can a business implement e-Invoicing before the mandatory date?

Yes — many businesses are voluntarily adopting ahead of deadline to gain efficiencies, engage ASPs early and minimize rush-implementation risks.

#### Q. Does e-Invoicing apply to intra-group or self-billing transactions?

Yes — group supplies, self-billing, intercompany transactions are subject to the framework if they fall within the scope of VAT-registered persons and B2B/G.

#### Q. Can an e-Invoice be cancelled or edited?

No. Once issued, an e-Invoice cannot be cancelled. Corrections must be made by issuing a Credit Note referencing the original invoice.

#### Q. If the company provides services to overseas clients, must these be e-invoiced?

Yes, export transactions are in scope.

#### Q. Q. What happens if the company is part of a VAT group?

Each VAT group member must have its own Peppol endpoint with the ASP, even though the same group TRN is used.





## Role of M&M



### What M&M can offer



**Data Requirement Analysis:** The scope of this analysis includes Mandatory E-Invoice Data Fields and Formats and Review of Master Data (Vendor & Customer).

**Mitigation & Functional Action Plan:** The scope of this plan includes Business Process Re-engineering and Training and Change Management Strategies.

**System Readiness Review:** The scope of this review includes Assessment of Current ERP Accounting and Invoicing Systems and Evaluation of Existing IT Infrastructure for Real-Time Transmission.

**IT Gap Analysis:** The scope of this analysis includes Comparison of Current IT Capabilities vs. Peppol Network Requirements and Identification of Technical Gaps in Data Generation Transmission and Storage.

**Integration and Compliance Planning:** The scope of this planning includes Strategy for Integration with Accredited Service Providers (ASPs) and Peppol Network and Considerations for Digital Signing Security and Data Residency.

**Reporting & Deliverables Overview:** The scope includes How IT Systems will Support Real-Time Reporting to the FTA and Mechanisms for Audit Trails and Data Integrity

Key Deliverables				
System Readiness Assessment Report	Technical Integration Recommendations			
IT Gap Analysis Report	Consolidated Implementation Roadmap			



### **ABOUT M&M**



Diverse cultural background

Member of MGI global network

Tech savvy and innovation DNA

Stringent client onboarding process

High client satisfaction and retention







## ABOUT OUR NETWORK MGI WORLDWIDE





Locations worldwide strong coverage

Across 8 business-focused regions

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Member Firms
Globally

Offices in APAC

198 Offices In EMEA

Offices
In Latin America

Offices
In North America

8886 Professionals

1B Combined revenue





## **E-INVOICING IS NOT JUST COMPLIANCE**

IT IS DIGITAL TRANSFORMATION





#### **Need help with UAE E-Invoicing?**

A U D I T I N G Whether it's managing imports and exports, connecting with an Accredited Service Provider (ASP), or aligning your ERP system, our experts are here to ensure a smooth and compliant implementation.

Contact us — we'll help you make e-Invoicing simple and seamless.



**Nancy Thakrar** Manager - Tax Nancy@mandmauditing.com 050 984 1552



**Arpit Maniyar** Director - Tax Arpit@mandmauditing.com 058 906 5462



Vinayak Aatreya **Managing Director** Vinayak@mandmauditing.com 052 777 2978



2307 - Oaks Liwa Heights, Cluster W, Jumeriah Lake Towers, Dubai UAE. PO Box 43711

#### **OUR OFFICES:**

Dubai, Abu Dhabi, Sharjah & Hamriyah

**M**: 971 52 777 2978 **T**: 971 4 448 6424

#### **Email Address:**

info@mandmauditing.com

#### Website:

www.mandmauditing.com

www.mgiworld.com



#### Legal documents referred:

Federal Decree-Law No. (16) of 2024, Ministerial Decision No. 243 & 244 of 2025, Ministerial Decision No. 64 of 2025, Cabinet Decision No. 52 of 2017 (amended by Decision No. 100 of 2024)