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The future of Indirect Tax – how to prepare for changes ahead

2025 KPMG EMA Tax Summit

Amsterdam

—

26 June 2025

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Our agenda for today

Time	Session	speakers
09:30	Welcome	Antje Müller
09:35	Key trends shaping the future of indirect tax to 2030	Lachlan Wolfers & Kathrin Feil
10:15	E-invoicing & Digital reporting focus	Lyubov Skenderova Christopher Böcker Magali Besnard Stefanie Dreher
11:15	Coffee break	
11:45	Global supply chain management	Severine Kerkhove Werner Gelderboom Katharina Beck
13:00	Lunch	
14:00	Practical experiences and trends with tax authorities in various European countries	Davide Morabito Miguel Ferrandez Amoros Tim Jones Esther Freitag Antje Müller Pietr Zurowski Anne-Laure Benoist
15:00	end of day	

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Key trends shaping the future of Indirect Tax to 2030

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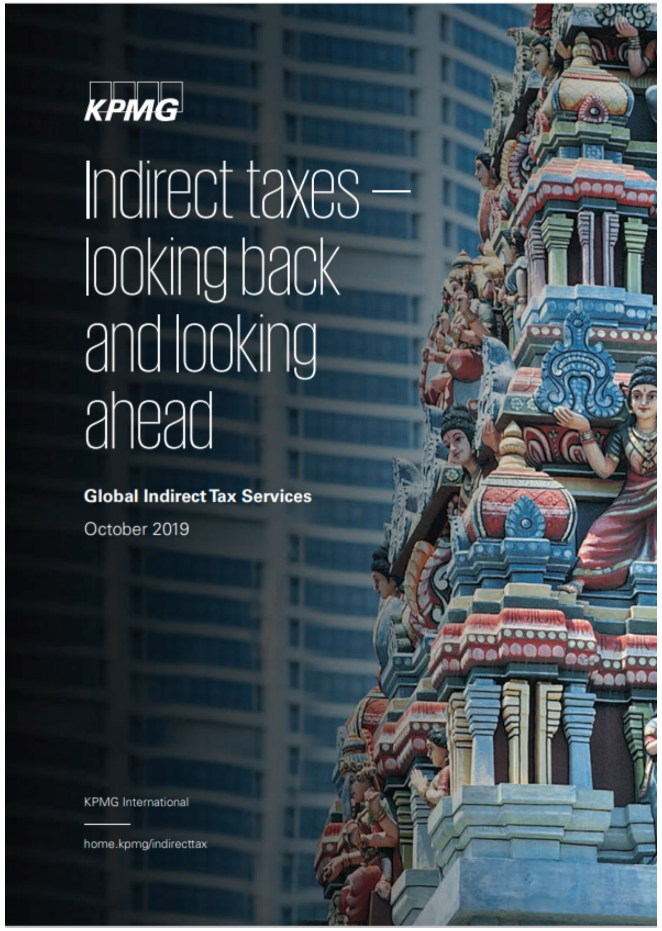
Today's presenters

Lachlan Wolfers
Global Head of Indirect Tax
KPMG Canada

Kathrin Feil
EMA Region Head of Indirect Tax
KPMG Germany

The future of indirect taxes to 2030



Predictions to 2030
Policy / Legislative

Policy predictions for indirect taxes

Prediction 1 – VAT works

The tax base for a VAT does not need to change – it can handle the modern challenges of our economy

Prediction 2 - carbon

The world is yet to find the right way to price carbon

Prediction 3 - DSTs

Farewell to the corporate income tax – the world will move to a modern DST

Prediction 4 - Tariffs

Tariffs are amongst the worst of tax policies, and sadly they will proliferate

Prediction 5 – progressive VAT

The ideal form of a indirect taxes is a more progressive VAT – easily achievable and yet elusive

Key trends shaping the Indirect Tax Landscape in the EU

1

General Court instead of European Court of Justice (ECJ):

- new responsibility for indirect tax (i.e. common VAT regime, customs code, combined Nomenclature tariff clarification, excise)
- since 1 October 2024

2

VAT in the Digital Age – 3 Pillars:

- E-Invoicing & E-Reporting – 1 July 2030
- Platform economy – 1 July 2028
- Reduction of VAT registration requirements (OSS, Reverse Charge, no consignment stock simplification) – 1 July 2028

3

Customs, Trade & ESG:

- Tariffs, Digital Service Tax & Export Control
- EU Deforestation Regulation (start 30 December 2025)
- CBAM (emission trading as of 1 January 2026)

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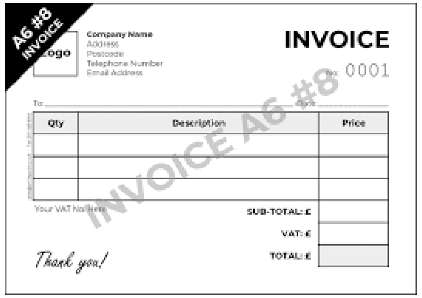
Predictions to 2030
Technology

Technology predictions for indirect taxes

E-invoicing	Systems > Laws	AI regulation	Retail sales tax system	Use of transactional level data for other taxes
Contemporaneous paper & e-invoicing	Indirect taxes will not be governed by laws – it will be governed by systems	AI gives tax authorities virtually unlimited power which needs to be regulated	There should be a shift towards a more technology-driven retail sales tax system	Just as the digital economy is dominated by platforms, so too will the tax profession



Digitalization & Automatization

1

System transformations:

- E-Invoicing & Digital Reporting systems (e.g. Pagero, Sovos, Edicom, SAP DRC etc.)
- S/4HANA Migrations
- Tax Engines (e.g.Vertex, Thomson Reuters, Avalara etc.) & Add-on implementation

2

Data Analytics & Workflow Management:

- Recognition of risks and opportunities
- Implementation of Tax Compliance Management Systems
- Trade Data Check

AI use case examples

Invoice extraction agent

Uses GenAI to extract text, tables, structure and key-value pairs from invoices in over 150 printed languages into a common data model.

Attribute enricher

Reads invoice line items and provides additional information around the purchase (ie to support predominant use).

Tax Notices

This "Agent" leverages GenAI to extract information from a scanned notice. This information is then sent (via API) to the Digital Gateway Notice Tracker. Notice Tracker Agent can assist in responding to the notice.

Tax code assistant

Evaluates the mapped tax code and identifies potential variances.

VAT smart analytics review

AI offers a detailed examination of tax returns and identify potential concerns before filings and is displayed in the PowerBi Analytics.

VAT recoveries

OCR assists with gathering information from pdf documents. Analytics assist with recovery review. Machine Learning identifies items with high likelihood of recovery based on historical analysis

Compliance Workflows

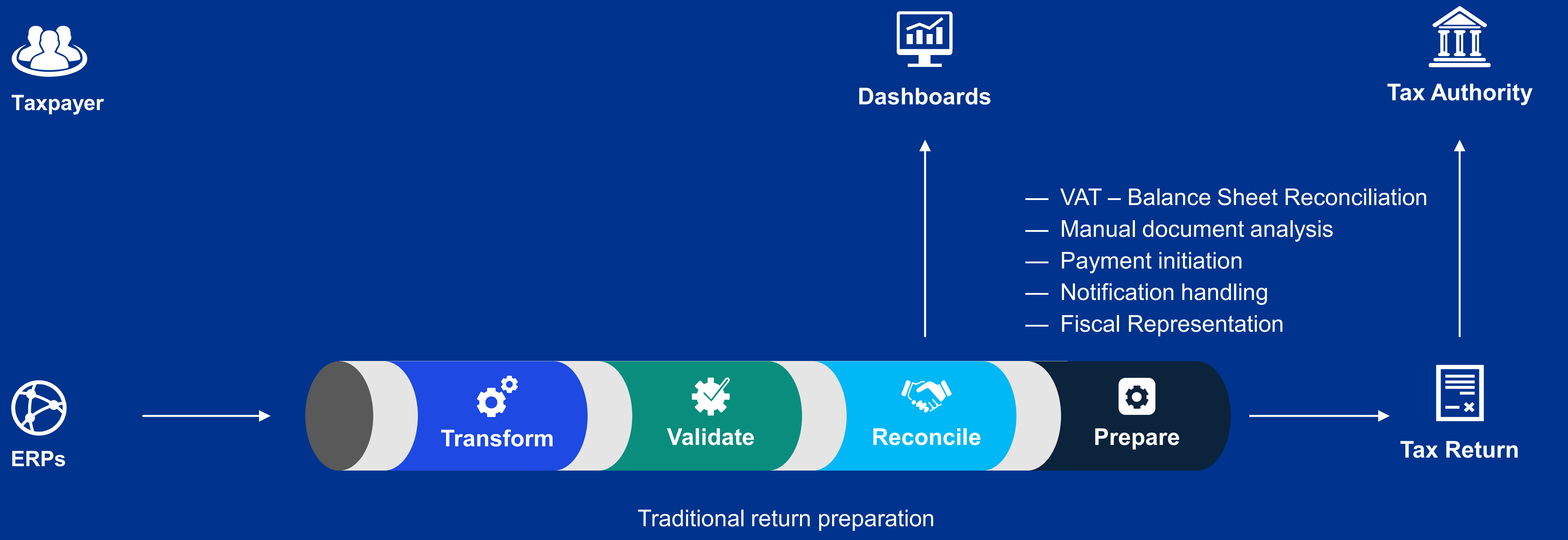
Gen AI conducts first pass review to process key controls.

Tariff tools

A range of Gen AI capabilities to support tariffs, including global regulatory tracking, tariff classification determinations, agreement reviews, restricted party screenings, product analysis

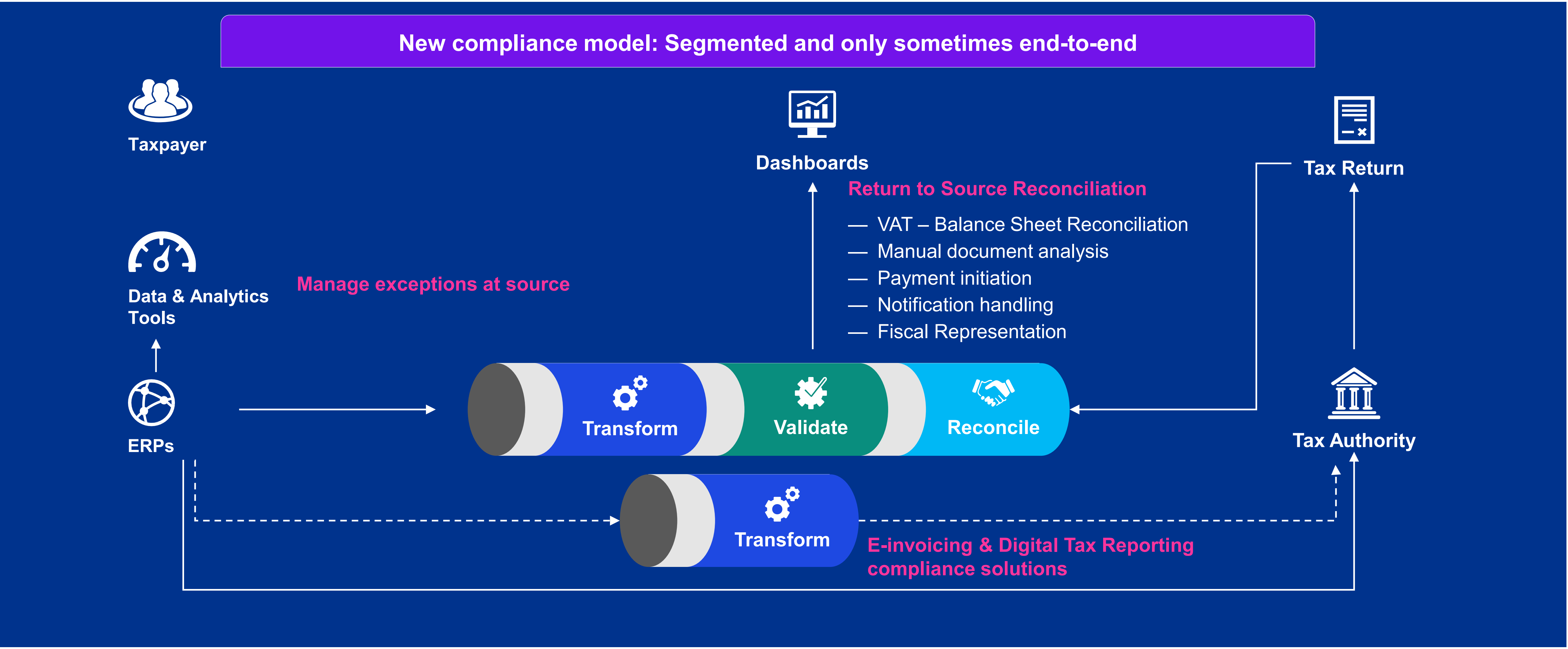
The role of Indirect Tax Professionals to 2030

Indirect taxes – the past & the present



Current compliance model: Always end-to-end & linear

Indirect taxes – end-to-end compliance model



Our view of the world to 2030

Digital Gateway Platform

Platform

- Legal Entity Management
- Workflows
- Document Collaboration
- Smart Questionnaire
- Data & Analytics
- Modeling Framework
- Data Workflow Central
- Document Extraction
- Intelligent Transaction Analytics
- App Center
- News
- Gen AI

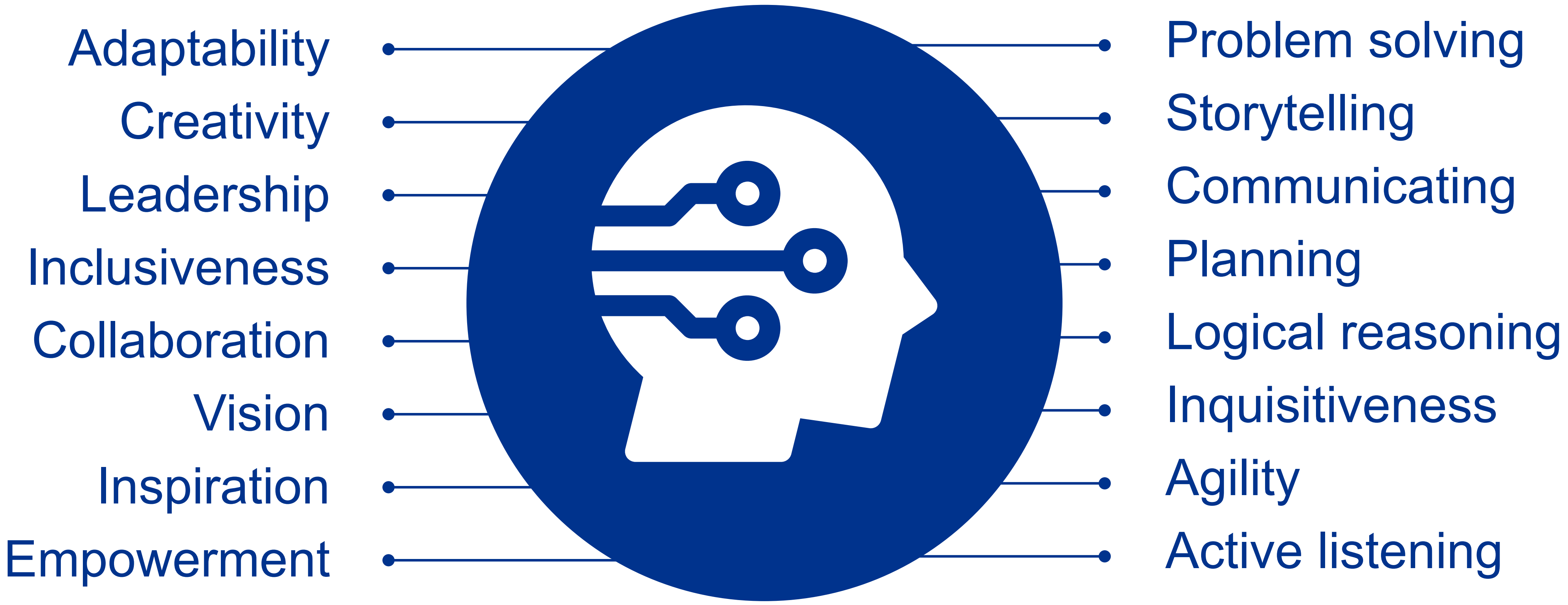
Data Ecosystem

- Data Collection
- Data Pipelines
- Storage
- Mappings
- Data Storefront
- Connections

Integrations

DG Apps	DG Global Tax Engines	Connected Models	Member Firm Tax Engines	Last Mile Solutions	Third party Integrations
Deal Connect	Transfer Pricing Engine (TPE) - Reporter	Risk Analyzer	DMaaS (ASPAC)	CCH	THOMSON REUTERS
ESG – Global Tax Footprint	Transfer Pricing Engine (TPE) - Comparable Insights	BEPS 2.0 Rapid Assessment Tool	DFAM (ASPAC)	Alphatax	servicenow
KPMG BEPS 2.0 Automation Technology (KBAT)			Business Tax Engine (US)	DATEV	Microsoft Dynamics 365
			Various Excel Models (transitioned to Modeling Suite)	Thomson Reuters	Indirect Tax Compliance

Conclusions – your role



Q&A

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VAT's next?

E-invoicing & Digital reporting focus

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Agenda

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Magali Besnard
Tax Transformation Partner
KPMG France

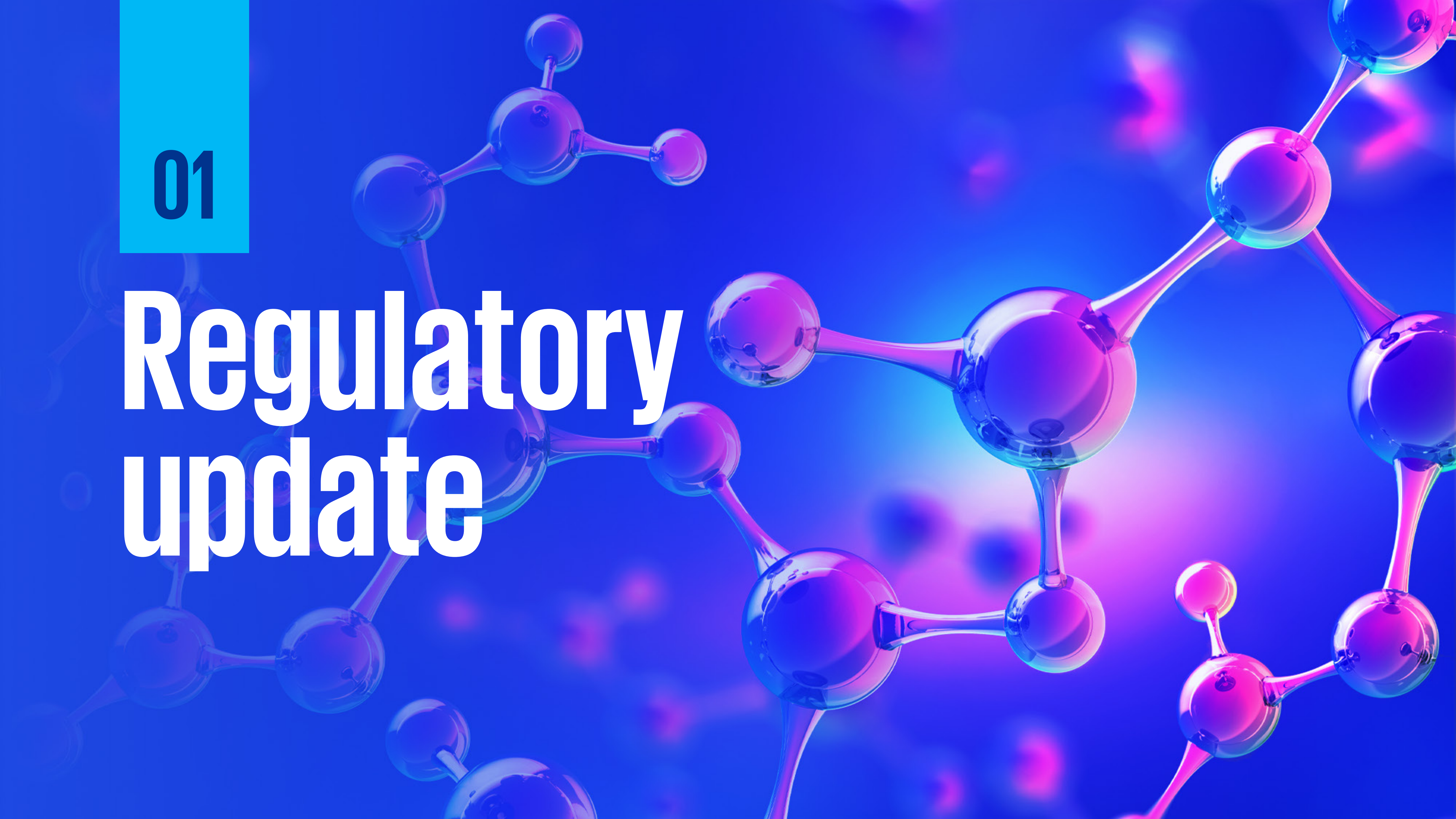
Christopher Böcker
Indirect Tax Partner
KPMG Germany

Stefanie Dreher
Indirect Tax Director
KPMG Belgium

Lyubov Skenderova
Global E-invoicing Lead
KPMG Meijburg & Co

01

Regulatory update



Global roadmap of VAT reporting requirements

		2001 - 2009	2011	2014	2016	2017/18	2019/20	2021	2022	2023	2024	2025	2026	2027	Beyond
Audit files (SAF-T, VAT Books)	Periodic	Germany Netherlands Bulgaria Portugal		Slovakia	Italy Czech Republic Poland Lithuania		Norway Croatia	Greece	Romania Hungary			Ukraine	Bulgaria		
	On demand	Austria	Luxembourg	France	Poland	Portugal									
Real time reporting						Spain Hungary									
Digital Tax Reporting							United Kingdom		Norway		Denmark				
E-invoicing	B2G	Denmark Finland	Italy		Czech Republic	Lithuania France Germany	Netherlands Greece Spain	Sweden United Kingdom Hungary	Belgium Luxembourg Australia						
	B2B	Argentina Brazil	Mexico Peru Uruguay	Chile South Korea Turkey	Indonesia Taiwan	Italy	India Ukraine Colombia Costa Rica	Egypt Russia China	Panama Paraguay Vietnam Guatemala	Saudi Arabia Serbia Ghana	**Romania** **Israel** **Malaysia** **Dominica** **Mauritius**	**Germany** **Jordan** **Estonia**	**Belgium** **Slovakia** **UAE** **Poland** **France** **Bahrain** **Philippines**	**Germany** **Oman** **Spain** **Slovenia** **Latvia**	**Bulgaria** **Netherlands** **Sweden** **Croatia** **Malta** **Ireland** **Australia**
Other										Japan			**Portugal**		**EU ViDA**

Visual for illustrative purposes and is not exhaustive of all global developments. Timelines are subject to change depending on Tax authority announcements

Belgium — E-invoicing and Digital Reporting Overview

Alligned with ViDA

Highlights & Scope

- ***E-invoicing:*** Mandatory E-invoicing based on 3 vectors
  - ***B2B domestic transactions,*** Except for exempt transactions under art. 44 of the Belgian VAT Code (e.g. financial transactions).
  - ***Supplier:***, Belgian established VAT taxable persons (including VAT groups and FE).
  - ***Customers:*** Belgian established VAT taxable persons (including VAT groups and FE).
  - ***Documents:*** Invoices, credit notes, self-billing invoices, intercompany
- ***E-reporting:*** 2028
- ***E-invoicing B2G:*** ***since 2019***
- ***E-invoicing B2C:*** ***N/A***

1 January 2026

- Mandatory B2B E-invoicing
- E-invoicing is mandatory for suppliers and customers established in Belgium
- Transmission of E-invoices via the PEPPOL Network
- E-invoicing will not be mandatory for VAT exempt transactions without the right to input VAT deduction

Expected 1 January 2028

- Mandatory E-reporting to the Belgian Tax Authority in near-real-time
- 5-Corner model via the PEPPOL Network
- For B2B domestic transactions
- Intended to replace the annual customer listing report

Technical Requirements

- New definition of structured E-invoices (based on ViDA)
- PEPPOL-BIS format via the PEPPOL network
- Other format possible if compliant with CEN standard (EN 16931) and both parties agree
- Structured E-invoices can be issued by supplier, a third party or customer (self-billing)

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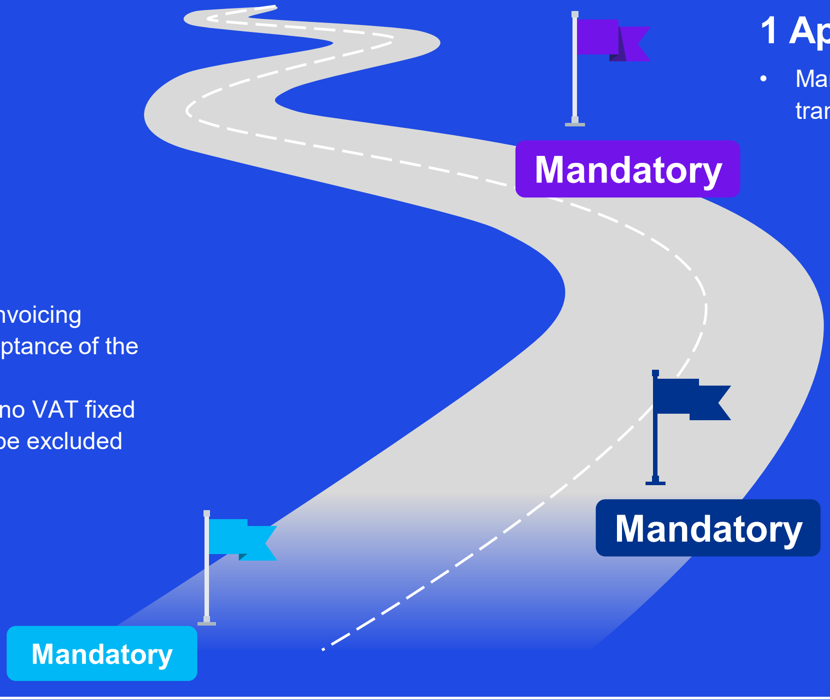
Poland — E-invoicing and Digital Reporting Overview

Not Alligned with ViDA

Highlights & Scope

- *E-invoicing:* Mandatory E-invoicing via **KseF** from 2026
  - Postponement from July 2024 to February/ April 2026
  - Still awaiting final FA schema and legal regulations – exp. June 2025
  - Applies to taxpayears seated or with fixed establishment in Poland
  - Covers *B2B* and *B2G*; *B2C* optional (still not finally confirmed)
  - All sale transactions (domestic and cross-border ones)
- *E-reporting:* SAF-T implemented in 2016; obligatory monthly/quarterly SAF-T VAT reporting (all sales and purchases, domestic and cross-border); some SAF-T files on demand;
- *E-invoicing B2G* already in place but via different system (PEF), obligatory only for e-invoice receiving by purchaser



1 January 2022

- Transition/ test period for E-invoicing
- E-invoicing requires the acceptance of the customer
- Non-Polish VAT-payers with no VAT fixed establishment in Poland will be excluded

1 February 2026

- Mandatory E-invoicing for large companies
  - Companies with sales exceeding PLN 200 million
- Implementation of the National E-invoicing System (Krajowi System e-Faktur – KSeF)

1 April 2026

- Mandatory E-invoicing for all B2B and B2G transactions for all businesses

Technical Requirements

- For **KSeF** Poland did not create its own CIUS but has developed a separate schema FA(3)
- Within **KSeF** transmission (sending and receiving) of E-invoices by API published by Polish Ministry of Finance
- Challenges of KSeF includes adapting IT systems, training employees and modifying internal processes
- Within current voluntary B2G e-invoicing (**PEF** system) PEPPOL is being used

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France — E-invoicing and Digital Reporting Overview

Alligning with ViDA

Highlights & Scope

- ***E-invoicing:*** E-invoicing concerns all transactions for the purchase and sale of goods and/or the supply of services carried out between companies established in France and subject to VAT when they are so-called domestic transactions, i.e. those concerning the national territory (B2B transactions).
- ***E-reporting:*** Cross-border B2B sales, supplies,, purchases; B2C domestic sales and foreign services; Payment Data. Periodically e-reported.
- ***E-invoicing B2G:*** already mandatory since 2017
- ***E-invoicing B2C:*** not in scope. See E-reporting.

1 September 2026

- All companies will have to receive their invoices in electronic format.
- Large companies and mid-sized companies will have to issue their invoices in electronic format
  - More than 5,000 employees, regardless their annual sales of balance sheet total (large company)
  - Fewer than 5,000 employees, but annual sales > EUR 1,500 million and balance sheet total > EUR 2,000 million (large company)
  - Only one of the above mentioned criteria is satisfied (mid-sized company)

Mandatory

Mandatory

1 September 2027

- Very small and medium sized companies will have to issue their invoices in electronic formats
  - Fewer than 10 employees and annual sales < EUR 2 million (micro-enterprise)
  - Two criteria need to be satisfied: Fewer than 250 employees or annual sales < EUR 50 million or total assets < EUR 43 million (small and medium sized company)

Latest updates on the reform

- No further postponement of entry into force : 1 September 2026
- Integration of PEPPOL in the French ecosystem and will serve as a ‘common language’ and default interoperability protocol between PDPs
- Final guidelines are due to be published at the end of June: it will be necessary to check whether there have been any adjustments or new cases
- VAT registered and non established : the situation is not clear for the moment

Technical Requirements

- B2B invoices will be transmitted via certified service providers (PDP) connected to that central platform that will have to obtain authorization.
- Businesses must still demonstrate their e-invoices integrity & authenticity (via EDI; QES; Audit Trail).
- Accepted formats – Compliant with European standard EN16931; UBL 2.1 – UN; CEFACT V3 CII – FACTUR-X Basic.

Germany — E-invoicing and Digital Reporting Overview

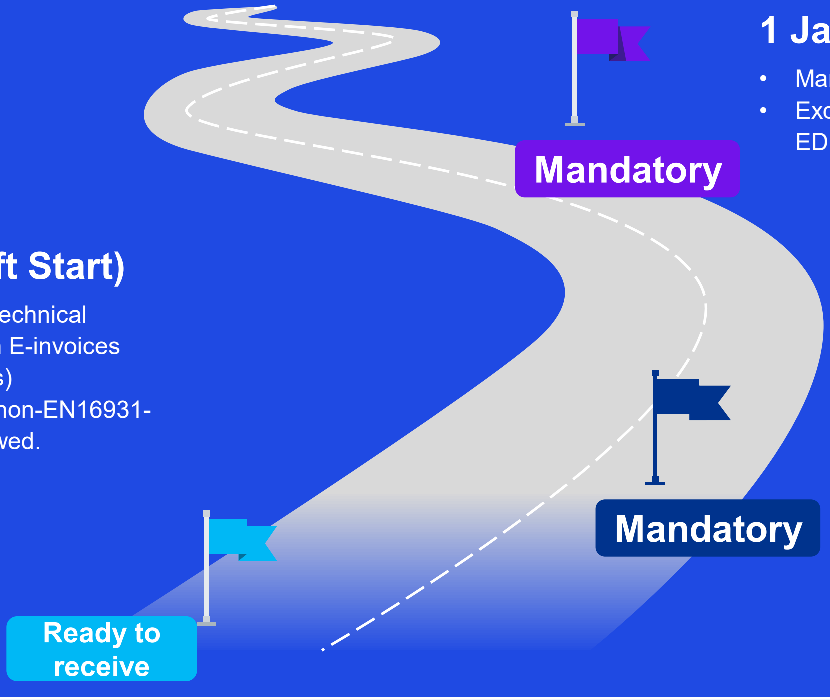
Alligned with ViDA

Highlights & Scope

Steps of mandatory B2B E-Invoicing

- *E-invoicing* implementation in 3 steps
  - January 2025: Soft Start – being ready to receive
  - January 2027: Mandatory B2B E-invoicing except for small businesses (under € 800k turnover) sending paper invoices in non-EN16931-compliant formats allowed for small businesses, VAT-exempt transactions, transportation tickets and simplified invoices (up to € 250)
  - January 2028: Mandatory B2B E-invoicing for all businesses

  Important: E-Invoicing obligation only applies if both, seller and buyer are established in Germany.
- *E-reporting* no legislative proposal published so far, but definitively planned for a later stage (maybe together with ViDA in 2030 or even later)
- *E-invoicing B2G* Already in scope since 2020, but different rules for all 16 Federal States
- *E-invoicing B2C* Not in Scope



1 January 2028

- Mandatory B2B E-invoicing for all businesses
- Exceptions for interoperable formats (e.g. EDIFACT as part of EDI)

1 January 2025 (Soft Start)

- Companies must create the technical requirements for receiving an E-invoices (EN16931-compliant invoices)
- Sending paper invoices and non-EN16931-compliant formats is still allowed.

1 January 2027 (Hard Start)

- Mandatory B2B E-invoicing except for an entrepreneur with annual turnover < EUR 800,000 (exception for sending paper invoices in non-EN 16931-compliant formats)
- Exceptions for simplified invoices, VAT exempt transactions and passenger transportation tickets.

Technical Requirements

- German permitted formats: XRechnung and ZUGFeRD from version 2.0.1 onwards
- Other permitted formats which comply with the CEN standard EN16931 (e.g. Factur-X (France) or PEPPOL-BIS Billing 3.0)
- Interoperable formats (e.g. within an EDI procedure) are permitted as well, if agreed between the parties and if the format allows the extraction of all required data into an EN 16931-compliant format
- EDI procedure using formats which do not fall under the permitted formats above are still allowed to be used until end of 2027

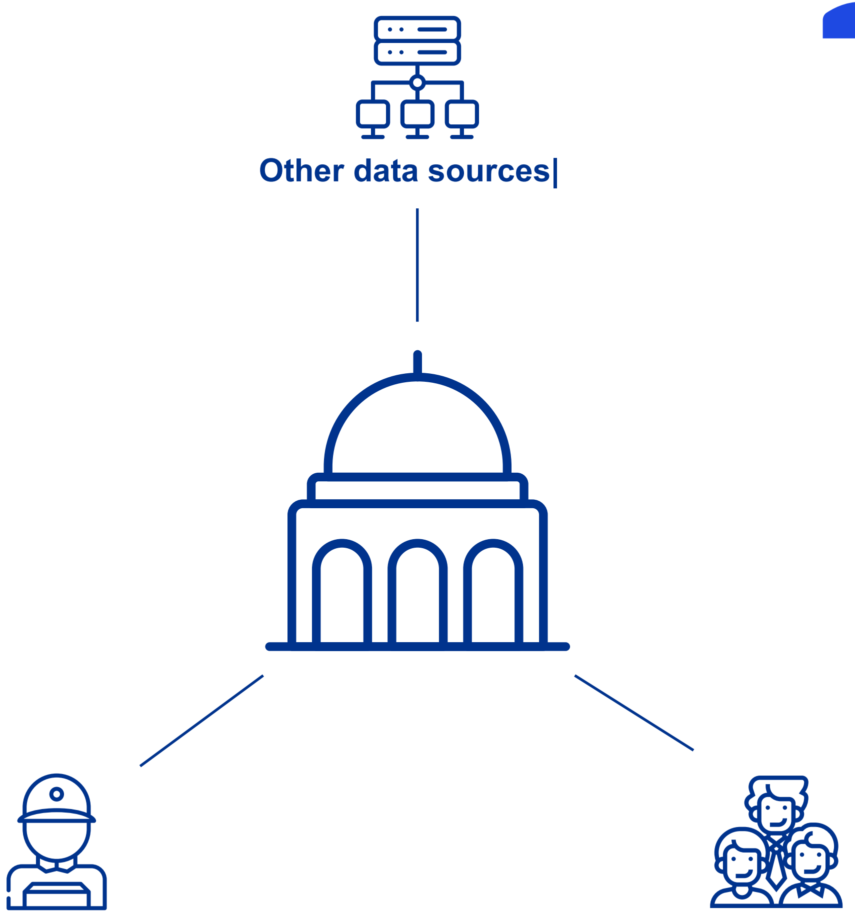
02

2030/35 – Europe after ViDA

The modern role of the government

Data collection

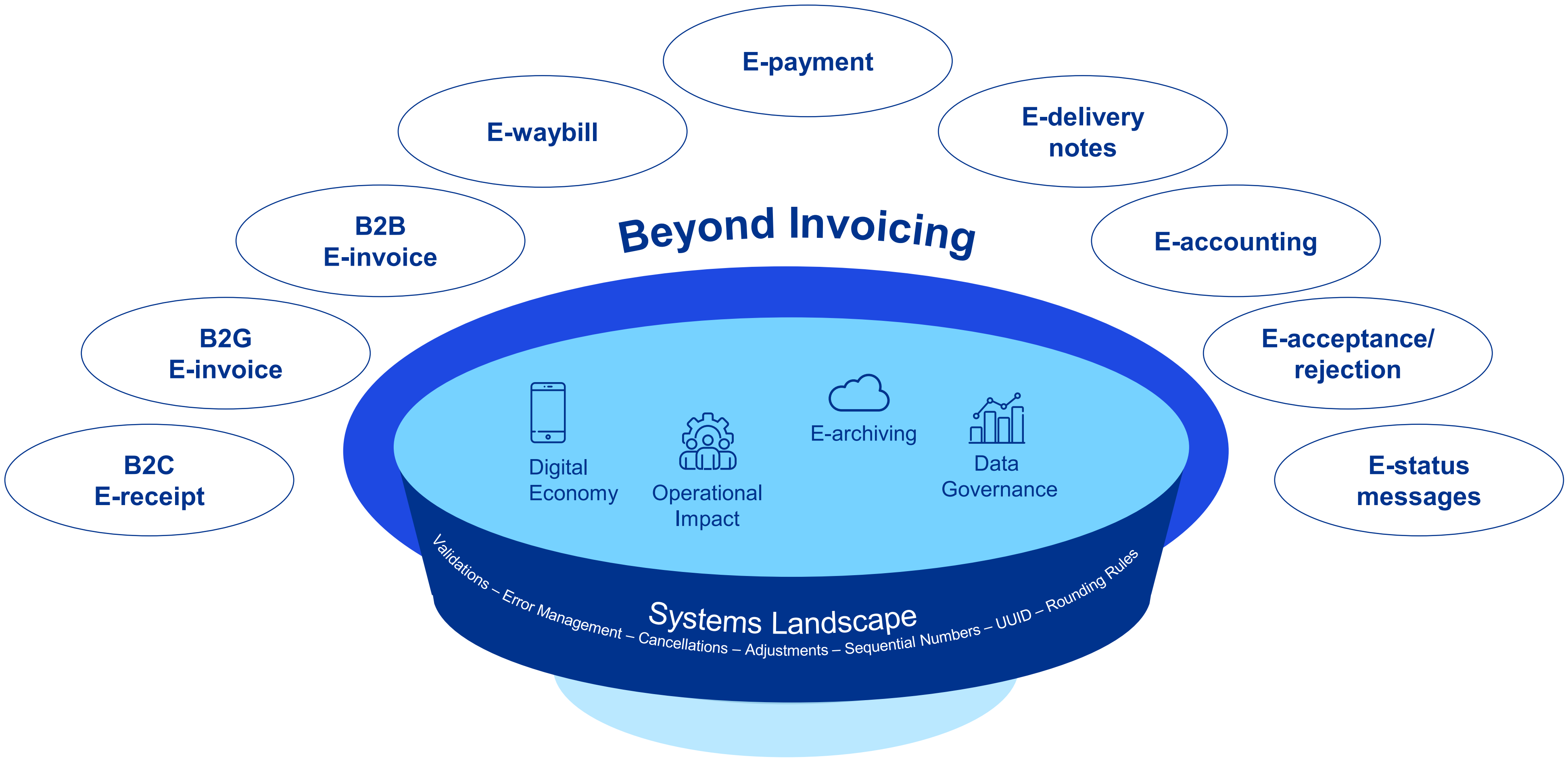
- Orders
- B2C invoice data
- B2B invoice data
- B2G invoice data
- Transportation
- Payments
- CIT
- Local and cross-border



Purpose

- Fight against VAT fraud
- Public policy development
- Data matching
  - Compare indirect tax and corporate tax reporting
  - Supplier vs buyer data
  - Real time vs periodic
- Intra-government sharing

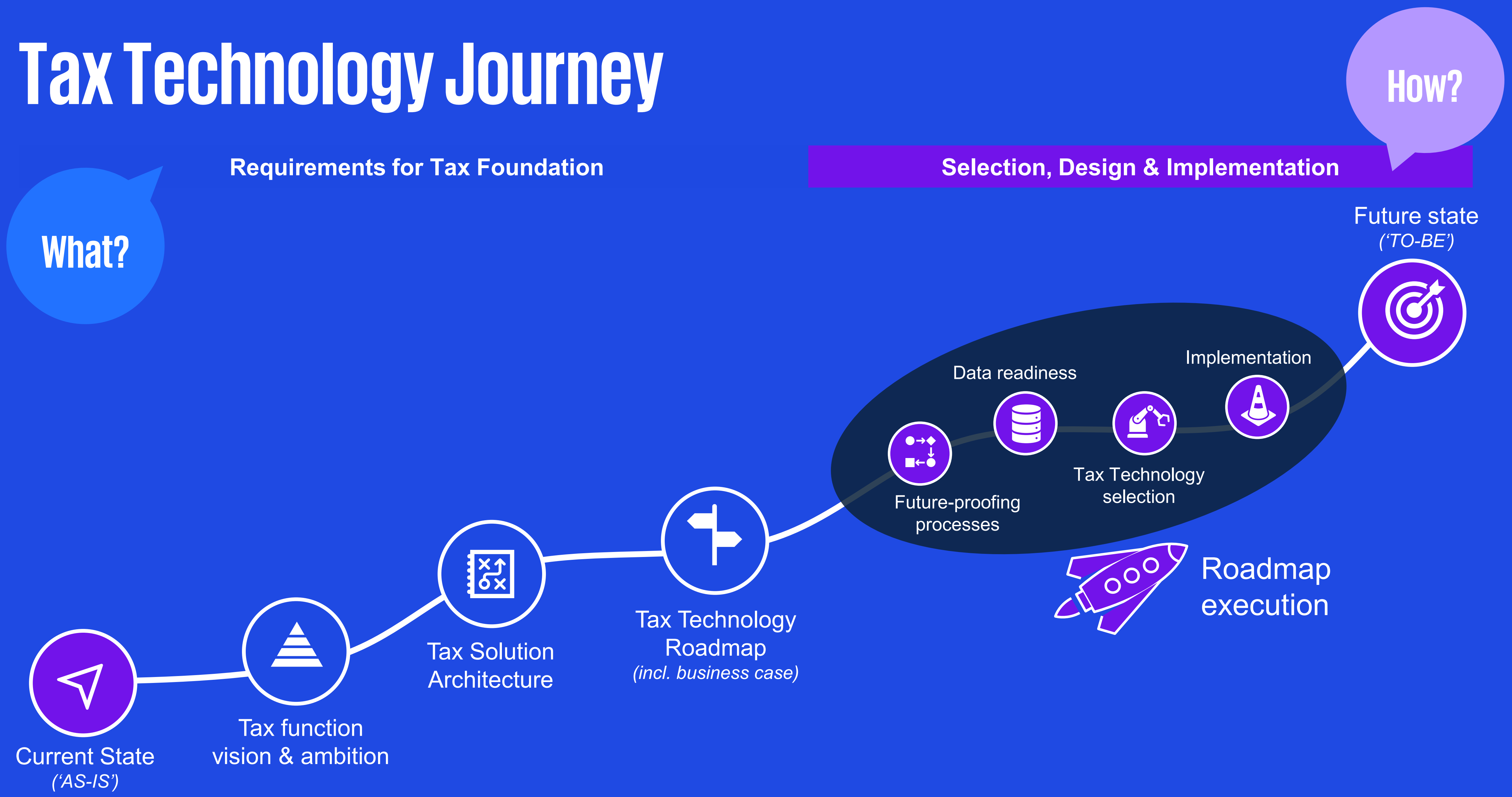
Compliance beyond e-invoicing



03

What should companies do?

Tax Technology Journey



Questions?

Global supply chain management

Balancing VAT, transfer pricing, and customs in a complex world

Today's presenters

Séverine Kerkhove
Indirect Tax Director
KPMG Belgium

Kartharina Beck
Indirect Tax Senior Manager
KPMG Germany

Werner Gelderblom
Indirect Tax Director
KPMG Meijburg & Co

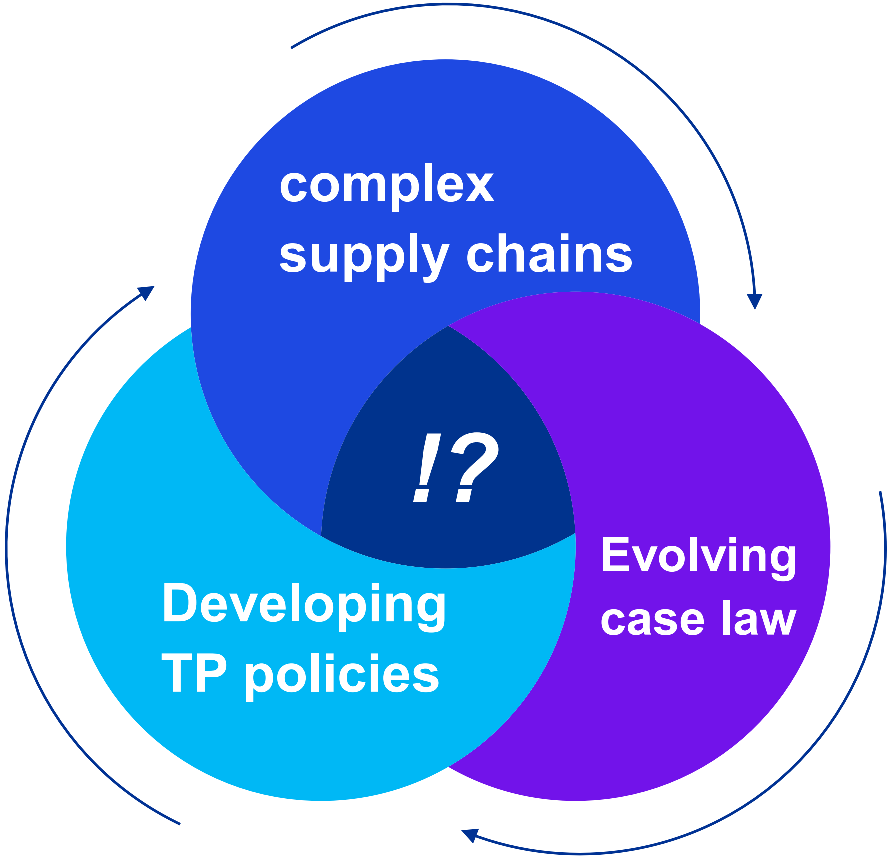
Agenda

1. Transfer Pricing and VAT

2. Transfer pricing and Customs

3. Case studies
   trade tariffs mitigation strategies

4. Wrap-up



01

Transfer pricing and VAT

Principles – VAT

Direct tax vs Indirect tax

Focus for TP is proper allocation of income between members of a multinational enterprise group. The purpose of the VAT system is a consumption tax (neutrality).

Taxable transaction (in-scope)

The supply of goods or services for consideration by a taxable person – article 2(1) of the VAT Directive 2006/112/EC.

Consideration

When? From the settled case-law of the ECJ – direct link between the transaction and the consideration received.

Taxable amount

Includes everything which constitutes consideration obtained or to be obtained by the supplier, in return of the supply, from the customer or a third party, including subsidies directly linked to the price of the supply.

Open market value

The consideration is the value received and not a value estimated according to objective criteria. Exception based on article 80 of the VAT Directive (anti-avoidance rule allowing MS to levy VAT on open market value).

Open market value (article 80 of the VAT Directive)

Member States may take measures in the following cases, when involving family or other close personal ties, management, ownership, membership, financial or legal ties, the taxable amount is to be open market value:

a) Where the consideration is lower than the open market value and the recipient of the supply does not have a full right of deduction. (legal ties can also include employer – employee relationship)

b) Where the consideration is lower than the open market value and the supplier does not have a full right of deduction and the supply is subject to an exemption.

c) Where the consideration is higher than the open market value and the supplier does not have a full right of deduction.

Open market value

“VAT arm’s length principle”

(article 72 of the VAT Directive)

The full amount that, in order to obtain the goods or services in question at that time, a customer at the same marketing stage at which the supply of goods or services takes place, would have to pay, under conditions of fair competition, to a supplier at arm’s length within the territory of the Member State in which the supply is subject to tax.

Need for guidance

There is a tension between the transfer pricing rules set out for the purposes of direct taxation which, based on the arm's length principle seek to arrive at the arm's length valuation of a transaction (i.e. the open market value), and VAT rules, generally based on the existence of a supply for consideration, where consideration is seen as a subjective value (i.e. the price actually paid).

VAT Committee, taxud.c.1(2017)1280928

Based on the VAT Directive, it is not clear when a Transfer Pricing Adjustment is a taxable transaction within- or outside the scope of VAT. In some cases it might be argued that a Transfer Pricing Adjustment is an adjustment of a previous Taxable Transaction and therefore constitutes additional consideration for the same Taxable Transaction. It may also be arguable that the Transfer Pricing adjustment is consideration for a different Taxable Transaction or alternatively is outside the scope of VAT.

VAT Expert Group, taxud.c.1(2018)2326098

It should be noted that the OECD Convention is irrelevant since it concerns direct taxation whereas VAT is an indirect tax.

ECJ 23 March 2006, C-2010/04 (FCE Bank), 39

Interaction VAT: TP methodology and documentation

1

Contracts and TP documentation

Clear description in intercompany contracts to allow the determination of the VAT regime.

2

Invoicing

- Compliance with the invoicing requirements from a VAT perspective.
- Identification of the issuer and recipient of the invoices.

3

Consideration

The allocation of functions and the renumeration may have an impact from a VAT perspective.

Interaction VAT : TP adjustments

Non – Voluntary adjustments

Imposed by the tax authorities

- ***Primary adjustment***: the modification of the taxable profits of a company, as a result of cross-border transactions with another company of the same MNE group.
  - ➢ Outside VAT scope as no consideration?
- ***Corresponding adjustment***: is made in response to a primary adjustment in first jurisdiction to avoid double taxation.
  - ➢ Outside VAT scope as no consideration?
- ***Secondary adjustment***: payment (e.g. dividends) is made to align the accounts with the primary adjustment.
  - ➢ Most probably outside of VAT scope as no direct link with supply of goods/services?

Voluntary adjustments

Performed by the taxable person

- ***Prospective adjustment***: included in the price of future supplies of the same products via a price decrease/increase.
  - ➢ Inside VAT scope and follow treatment of future supplies as no direct link with initial supply?
  - ➢ What if initial supply has another VAT treatment?
- ***Retro-active adjustment***: year-end adjustments.
  - ➢ Always inside VAT scope?
    EU Member States have different approaches
  - ➢ Issuance of credit note/debit note.
  - ➢ VAT reporting/Intrastat reporting.

Challenges

Inside or outside scope

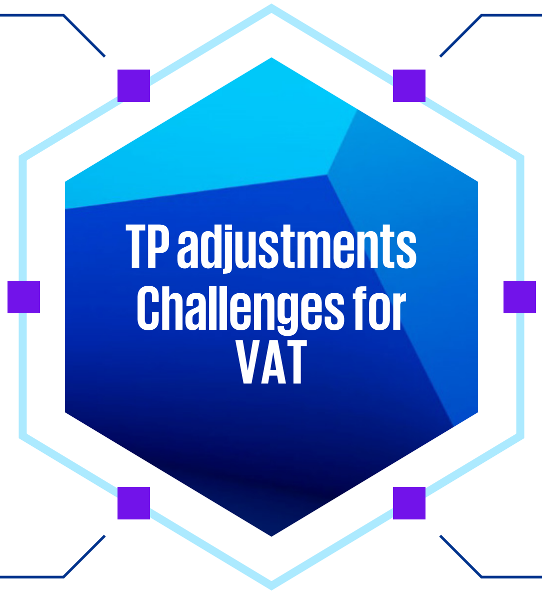
Taxable transaction?

Consideration

What is my consideration for a supply of goods or services. Is there a direct link with subsequent adjustments. See also ECJ case law Elida Gibbs and Boehringer.

Impact on VAT reporting

Issuance of credit notes/debit notes and adjustments to VAT reporting and Intrastat.
Note e-invoicing and DRR



VAT regime

Impact on different trade routes (import, intra-Community transactions and local transactions).

Risk (penalty + late payment interest)

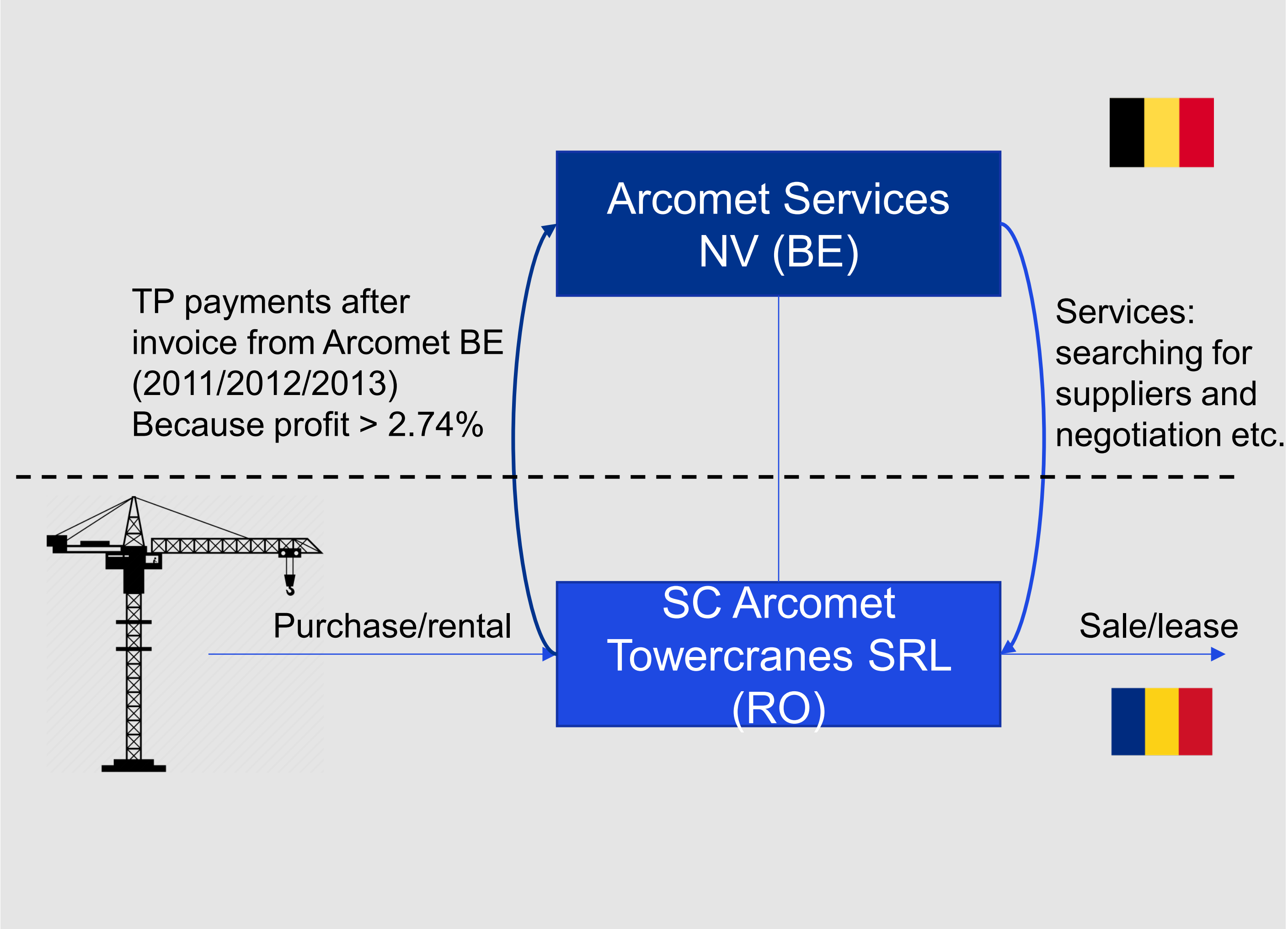
VAT deduction and calculation of VAT due. This is a risk both when VAT is charged and when VAT is not charged.

Lack of guidance

The complexity of the matter requires further guidance and harmonisation between EU Member States.

ECJ Case C-726/23 (Arcomet Towercranes)

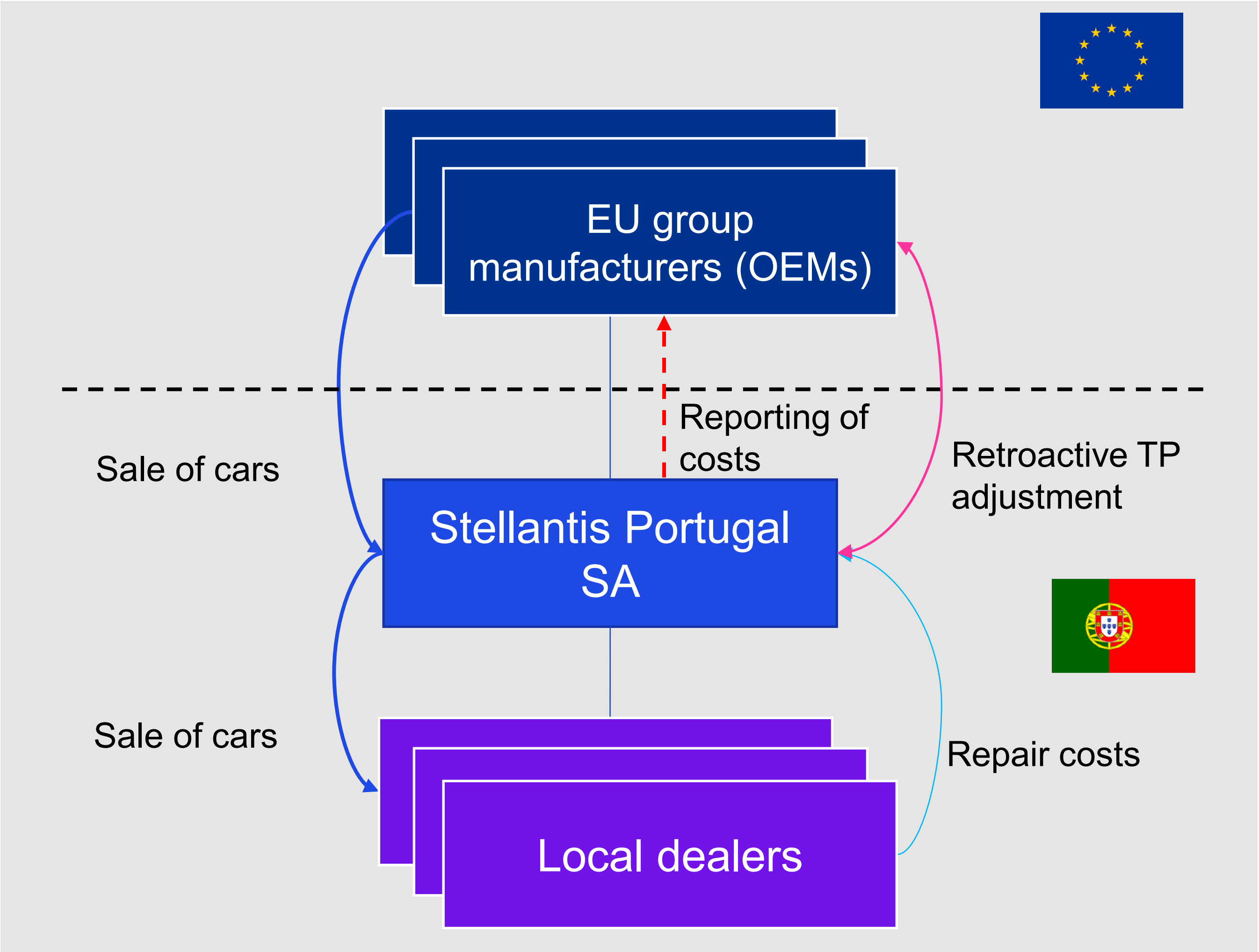
Questions:
- Should these TP payments be considered consideration for VAT taxable services?
- If so, what additional documents may the Tax Authorities require to substantiate VAT recovery?



ECJ Case C-603/24 (Stellantis Portugal)

Question:

- Should the retroactive TP adjustments be regarded as the remuneration for separate services?



02

Transfer pricing and Customs

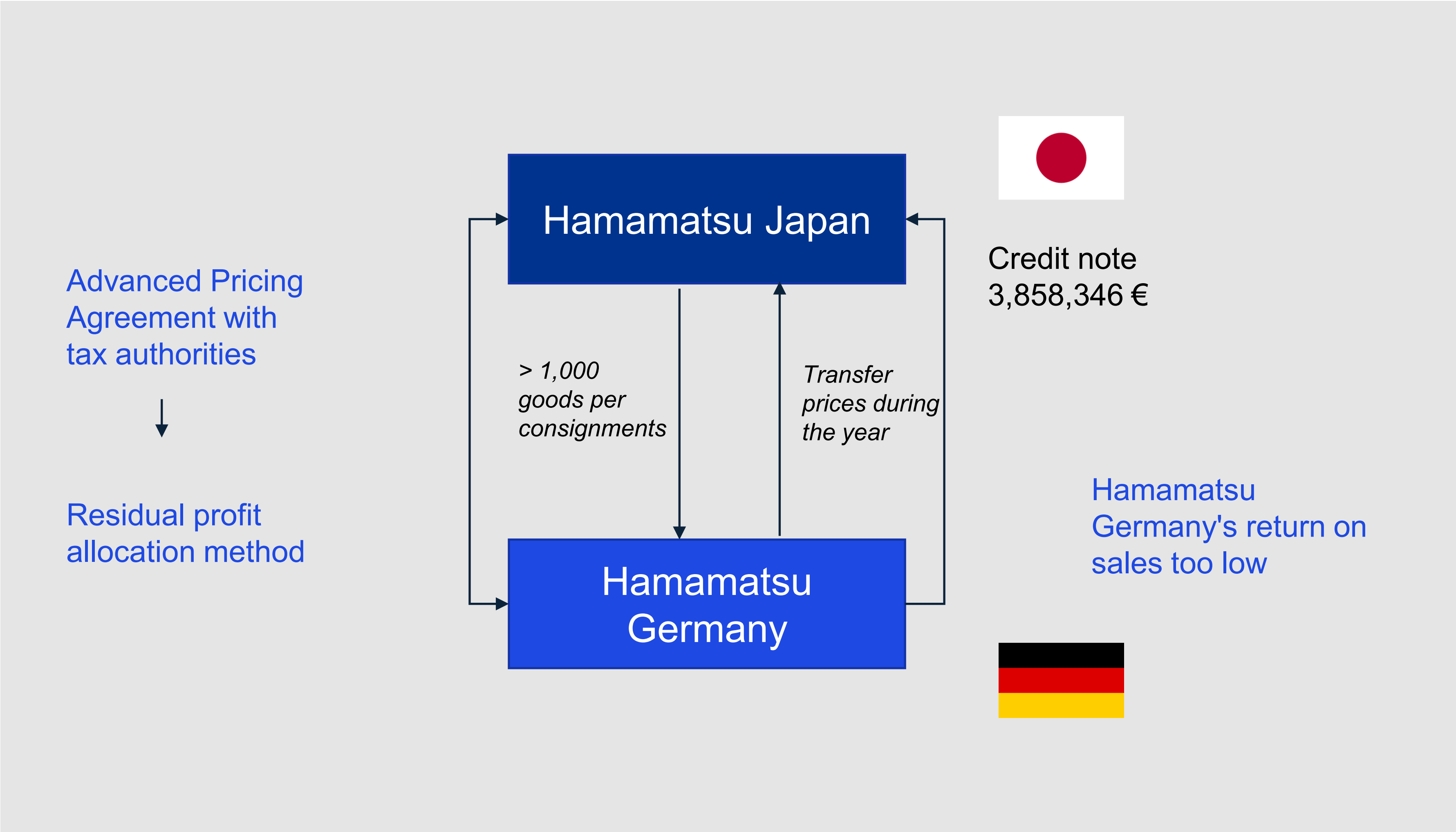
Basics of the GATT-Valuation

Customs value is...

— The rules for customs valuation are set out in the **WTO Customs Valuation Agreement** and are administered by the WCO or implemented in the **EU Customs Code** (UCC).
— Hierarchy of valuation methods, with the **transaction value method** being the most important method.
— If there is no transaction value, or if the transaction value is not acceptable because the price has been distorted by certain conditions, the GATT provides for **five other methods** of customs valuation to be applied in the prescribed hierarchical sequence

Transaction value	Identical goods	Similar goods	Deductive method	Calculated value	Fallback method
method 1	method 2	method 3	method 4	method 5	method 6

ECJ judgment of 20.12.2017 C 529/16 Hamamatsu



ECJ judgment of 20.12.2017 C 529/16 Hamamatsu

Questions arising from the ruling:

Does the ECJ ruling only apply to a customs valuation using the transaction value method or also to all other customs valuation methods?

Does the ECJ ruling only apply to flat-rate transfer pricing adjustments or also to product-related adjustments?

Does the ECJ ruling only apply to transfer pricing adjustments in the form of credit notes or also to transfer pricing adjustments in the form of subsequent charges?

How to handle

1. Alignment

→ Alignment Strategy between TP, Tax, logistics etc.

2. Coordination

→ Coordinate of customs declarations with the local customs authorities

3. Assessment

→ Assessment of the potential impact of different approaches by local customs authorities

4. Risk mitigation

→ Risk Mitigation Strategy:
- Local practices
- Fallback scenarios
- Rulings etc.

5. Documentation

→ Availability of documentation for substantiation of positions and providing these documents

6. Annual valuation

→ Annual customs valuation and corresponding corrections where applicable

03

Case study

trade tariffs mitigation strategies

Case study – trade tariffs mitigation strategies

Company: GlobalMachinery Engineering

Industry: Machinery Manufacturing

Challenge:

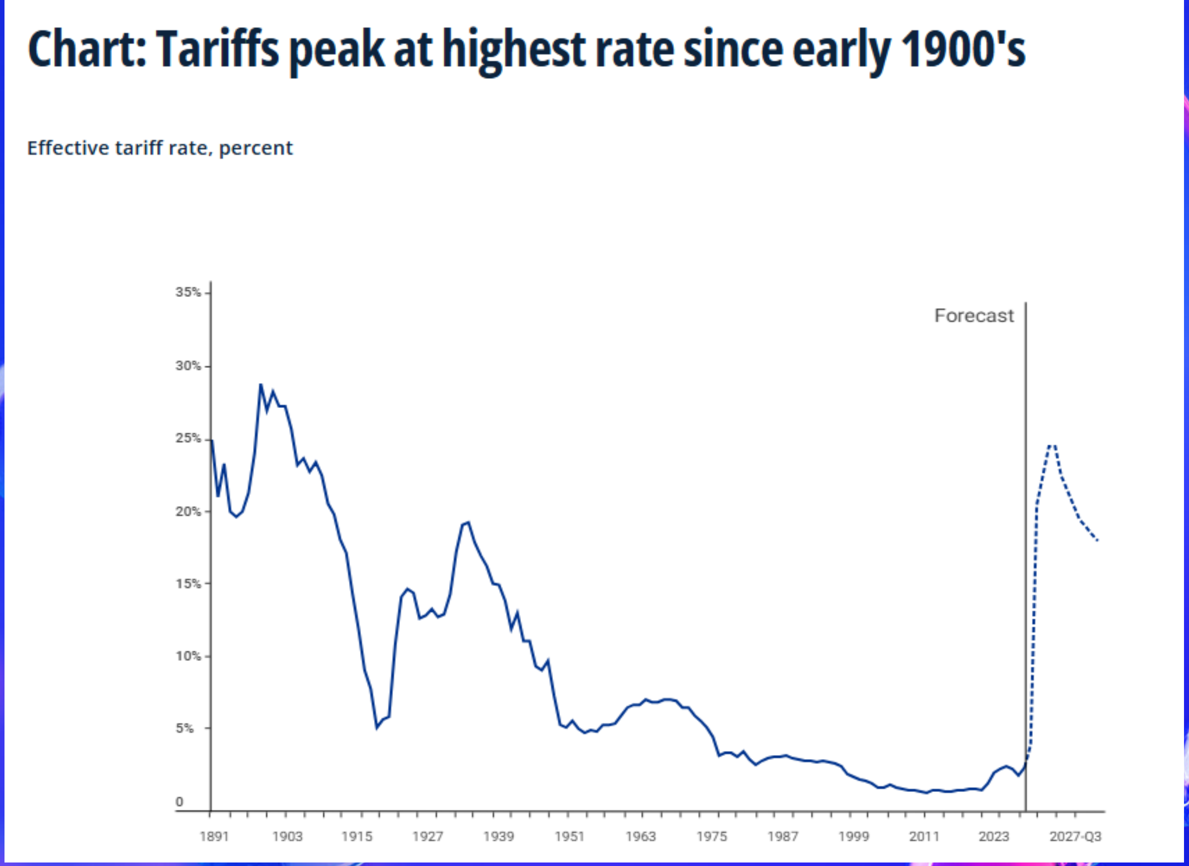
- GlobalMachinery Engineering is facing increasing trade tariffs and pricing uncertainties due to rapidly changing tariff rates.
- These tariffs are raising the costs of imported raw materials and components necessary for the production of machinery.
- The company is seeking ways to mitigate these tariffs to maintain competitiveness and protect profit margins.

Objective:

- Developing a strategy to reduce trade tariffs by restructuring the supply chain
- Avoidance of unforeseeable risks

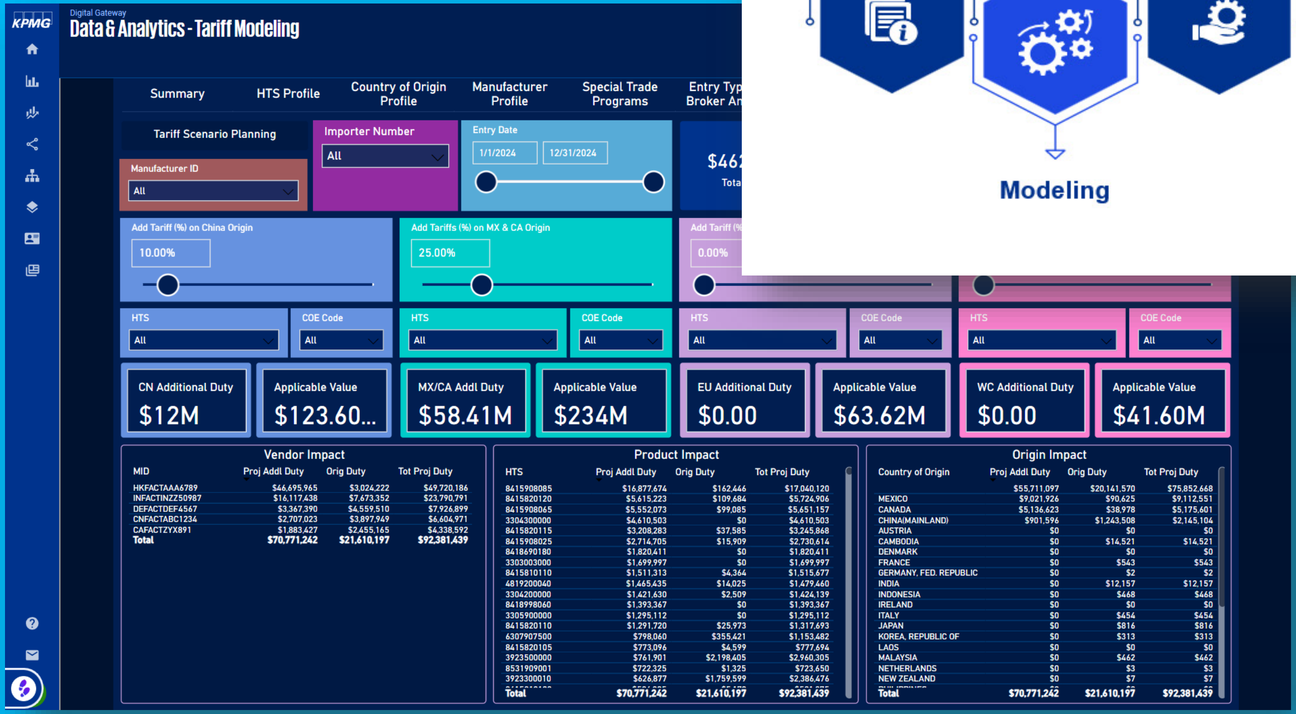
Current customs challenges - Tariffs

Transparency is the goal to meet the challenges!

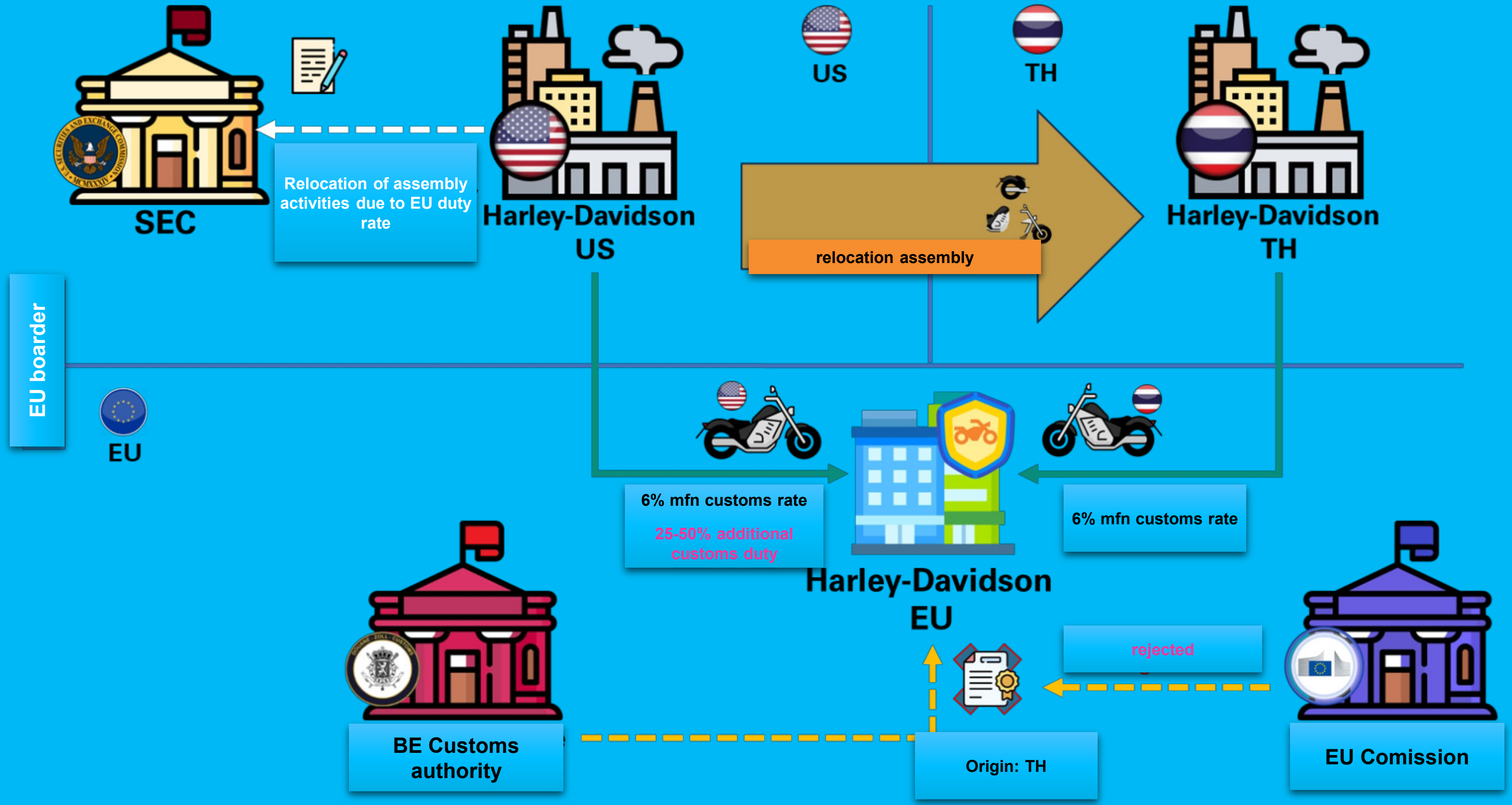


Source: KPMG Economics, United States Census Bureau

Tariff modeling

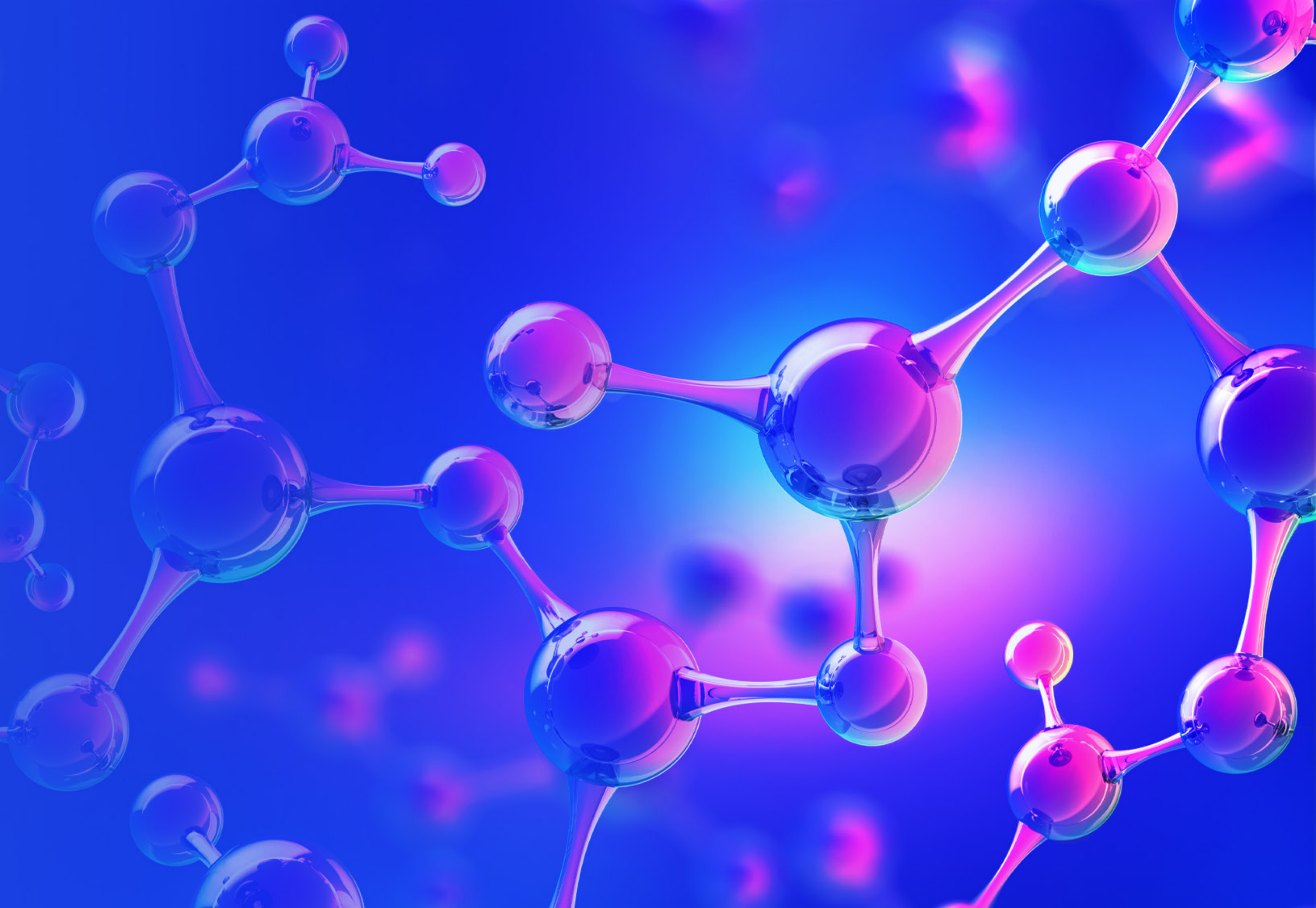


The Harley Davidson case



Judgment - 21/11/2024 - Harley-Davidson Europe and Neovia Logistics Services International v Commission Case C-297/23 P
November 21, 2024

Q&A



Playbook for an internal TP & Indirect Taxes Workshop

An integral approach of TP, Tax and Customs is key!

1. Supply chain transparency and TP documentation

Create full insight in the supply chain. Assess whether all material transactions are covered by complete TP documentation. Fill in the gaps!

2. Identify the 'best possible' VAT and Customs treatments

TP Adjustments?	VAT Base?	Customs Valuation?
Prospective / directly applied TP pricing	✓	✓
(Clearly) linked to identifiable supplies	✓ (corrective invoice)	? (local rules differ)
Linked to 'entirety' of transactions	✓ (separate supply?)	X (local rules differ)
Profit based adjustments	? (local rules differ, tendency towards VAT taxable)	X
Non-voluntary adjustments (only reflected in the CIT return)	X (local rules differ, generally no VAT)	X

3. Manage uncertainties

Mapping country specific risks
Monitoring evolving case-law (EU & local)
Reconsidering supply chains & valuation methods

KPMG

Practical experiences and emerging trends with European tax authorities

2025 KPMG EMA Tax Summit

Amsterdam

26 June 2025

Agenda

01

Introduction

Introduction - Today's presenters

Tin Jones
Partner
KPMG UK

Davide Morabito
Partner
KPMG Italy

Piotr Żurowski
Partner
KPMG Poland

Anne-Laure Benoist
Partner
KPMG France

Antje Müller
Partner
KPMG Germany

Esther Freitag
Partner
KPMG Austria

Miguel Ferrández Amorós
Partner
KPMG Spain

02

Countries' particularities

Particularities of the local Tax Authorities

Italy

- Accessibility: Very low
- Even small violations could trigger criminal investigation against directors, in addition to heavy monetary fines for the company
- Contradictory guidelines from the tax authorities

Poland

- Accessibility: Low
- Criminal investigations as a way to postpone statue of limitation
- Relatively helpful binding rullings system
- Slightly less rigid authorities since SAF-T implementation

France

- Possible agreement with the tax authorities to set up a partner relationship
- Binding guidelines from the tax authorities
- Possible application of very high penalty and possible application of criminal offense

Particularities of the local tax authorities

Germany

- Accessibility : low
- Significant increase in relevance of VAT in tax audits
- Strong focus on formalities
- Good cooperation on individual topics (e.g. chain transactions)
- Increase of criminal investigations

Austria

- Limited possibility to discuss with the tax authorities VAT Team
- VAT Guidelines not always consistent
- Rigid in mistakes leading in too low VAT payable in preliminary VAT returns

Spain

- Accessibility: Very low
- Contradictory guidelines from the tax authorities
- Rigid in unfulfillment of formalities

03

Roundtable: Countries' hot topics

04

Closing

Thank you for beeing our guests & Goodbye