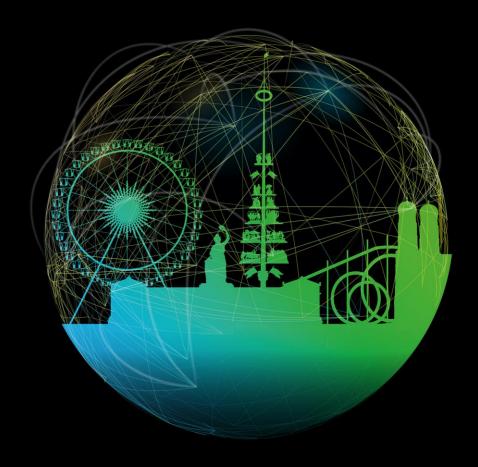
# Deloitte.



E-invoicing A catalyst for digital transformation

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# Agenda

01 Global developments & ViDA

02 Let's not wait until ViDA...

O3 Challenges and opportunities

04 Impact on system landscape



Where do you see your company on the e-invoicing journey?





# Regulatory lens: What and Why?



## What?

# **E-invoicing**

Process of sending and receiving invoices electronically in a structured data format (e.g. Peppol) which allows for its automatic and electronic processing between businesses.

# **E-reporting**

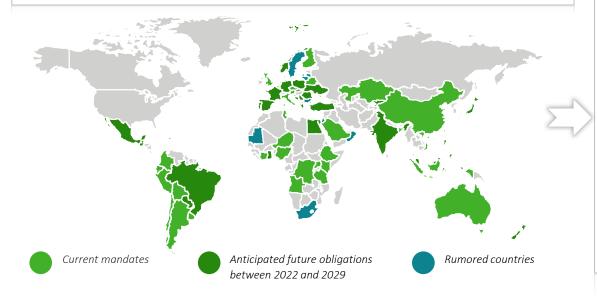
Process of electronically submitting tax-related information to the tax authorities. It is often complementary to e-invoicing and requires companies to transmit all information related to their AP/AR invoicing to the tax authorities within a certain timeframe.



# Why now?

#### Local

- Governments worldwide are adopting e-invoicing and e-reporting to reduce the VAT gap.
- Over 60 countries currently require digital reporting in various forms, with diverse timelines.
- By 2030, it is anticipated that nearly all countries will incorporate electronic reporting into their tax systems.



# **EU level**



**VAT in digital age (ViDA) -** European Commission's proposal issued on December 8, 2022



- The European Commission new proposal to introduce real-time digital (e-) reporting based on mandatory structured e-invoicing for businesses that operate cross-border in the EU, feeding into a central tax data warehouse.
- The aim is to establish a harmonized e-invoicing and e-reporting framework for domestic transactions in the EU likely by 2030 (note: this timeline may change).
- The proposal may undergo modifications and timeline adjustments but emphasize the necessity for harmonization between national einvoicing systems of EU member states and ongoing e-reporting obligations.

# Let us know your thoughts about ViDA



# Zoom in on ViDA: proposal – genesis

# Discrepancy between 30-year-old VAT rules and digitalization of business leading to a two-faceted problem.

# 1. Potentially sub-optimal VAT collection and control for tax authorities

The EU VAT legislative framework is not fully adapted to deal with digital reality of doing business and is prone to fraud.



# **Objective**

Improve VAT collection and control.



Deliver an updated VAT system that is more resilient against criminal VAT fraud through technology and digital advances.



# 2. Administrative burdens and compliance costs for businesses and tax authorities

The digital economy and new business models create new challenges and costs for tax administrations and businesses (that may have to grapple with up to 27 different national VAT systems).



# Objective

Simplify, modernize and clarify certain VAT rules.

# **Core areas of ViDA**

Uncoordinated digital reporting requirements (DRR) landscape across EU Member States, with some states having introduced their own unilateral versions and some having no DRR in place.

Number of instances where businesses need to register in more than one Member State can still be simplified, being particularly burdensome for crossborder operations and SMEs. Traditional and digital businesses are not treated equally, creating VAT inequality and distortion of competition.

### I. DRR

A proposal to introduce real-time digital reporting based on structured e-invoicing for businesses that operate cross-border in the EU, feeding into a central tax data warehouse, and a harmonized e-invoicing and DRR framework for domestic transactions.

## II. SVR

A proposal to improve and extend the already existing schemes to reduce registration burden for businesses carrying out transactions in Member States in which they are not established, namely the One Stop Shop (OSS), Import One Stop Shop (IOSS) and the reverse charge mechanism.

# III. Platform economy

New liabilities for VAT collection imposed on platforms facilitating short-term accommodation rentals and passenger transport as well as on e-commerce marketplaces (extending the 2021 deemed supplier rule to all marketplace goods transactions).



ViDA is part of the overall ecosystem for digitalizing VAT in the EU that includes reporting obligations for digital platforms (DAC7), payment service providers (CESOP), and crypto-asset service providers (DAC8).

# Zoom in on ViDA: Timeline – where are we today?

The European Commission (EC) adopted a Tax Package consisting of a.o. a detailed **Action Plan** with 25 distinct actions to make taxation simpler, fairer and better attuned to the modern economy over the coming years.

Publication of the report of the study covering (1) Digital Reporting Requirements (DRRs); 2) The VAT Treatment of the Platform Economy; and 3) The Single VAT Registration and Import One Stop Shop (IOSS). The purpose was to assess the current situation and to assess the impact of possible policy initiative in these areas.

**May 2023:** Close feedback period. All feedback received was summarised by the EC and presented to the European Parliament (EP) and Council.

**16 June 2023**: ECOFIN, MS are positive on implementation of VIDA. Concerns were raised on the date of implementation (minimum 1-2 years delay), the significant IT investment required and the uncertain feasibility/effectiveness of certain measures. **20 June 2023**: EP issued draft report on VIDA and suggested 300+ changes

**July-December 2023**: EU Presidency working meetings were held but the proposal was not brought to an ECOFIN meeting for decision

July 2020 July 2022 January – December 2023

#### October 2021 – May 2022

The EC has published its 2022 **Work Program**. The action plan announced a legislative proposal for 2022 under the heading 'VAT in the digital age' covering a.o. VAT reporting obligations and e-invoicing. **Feedback and consultation period** was opened to obtain the views of stakeholders on the proposed changes and preference on options being considered.

# December 2022

The EC announced its "VAT in the Digital Age" proposals on 7 December 2022. These proposals should result in legislative changes that transform the tax compliance and reporting requirements for a wide range of VAT registered businesses, with the objective to reduce the VAT Gap.

# January 2024 - ...?

**14 May 2024**: During the ECOFIN meeting, Estonia opposed the proposal due to concerns about the new deemed supplier regime (Pillar II – platform economy). No agreement was reached between the MS.

**21 June 2024**: ECOFIN meeting concludes (again) without agreement on ViDA, due to Estonia's disagreement with Pillar II.

New discussions expected in October/November 2024 under Hungarian presidency of the EU Council.

# Zoom in on ViDA: Roadmap in the proposal | Digital reporting requirements

- As of the date of entry into force of the directive (i.e. 20<sup>th</sup> day after it's official publication), a **derogation request** is no longer needed to implement a domestic B2B/B2C e-invoicing obligation
- As of the date of entry into force of the directive (i.e. 20<sup>th</sup> day after it's official publication), MS can decide that the acceptance by the established recipient of invoices issued according to the EU standard is not required in case of mandatory domestic e-invoicing.

EU MS that already implemented domestic e-invoice and DRR (in various ways) before 1
January 2024 or that have received a derogation before 1 January 2024, should converge to these EU standards by 2035 (for self-supplies and supplies of goods and services made between taxable persons within their territory).

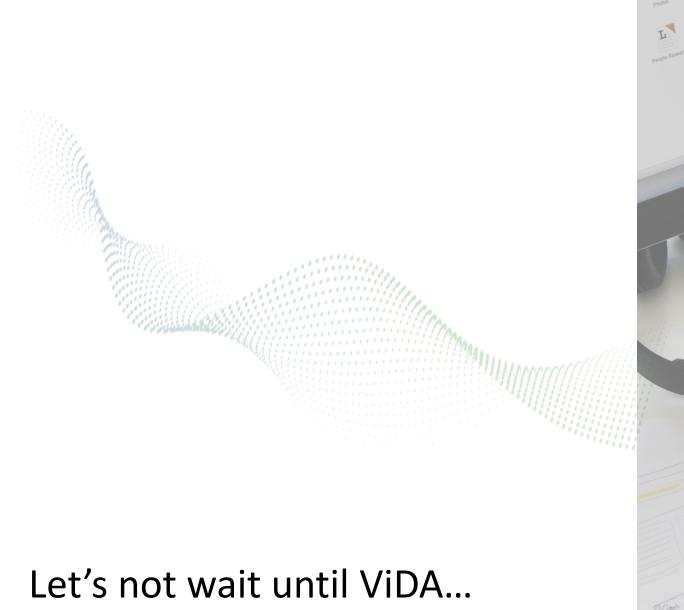
Date of entry into force\*

1 July 2030

1 July 2035

- Digital reporting through mandating e-invoicing for (almost) all cross-border supplies of goods and services.
- Setup of Central VIES for tax authorities.
- Current ESL abolished.
- MS introducing domestic DRR obligations, need to be aligned with the EU standard or other formats ensuring interoperability with the EU standard.

\*Depends on the date of publication





# E-invoicing | What does the future hold? – 2024

#### Ghana



Medium-sized taxpayers will likely to be mandated to implement e-invoicing by January 2024. The authority's plan is to have all VAT registered taxpayers enrolled on the e-invoicing system by the end of 2024.

This also includes non-resident suppliers of ecommerce and telecommunication for use or enjoyment in the country as required under the VAT Act.

#### **Bolivia**



It will be mandatory for various groups of taxpayers to begin using electronic invoicing by designated deadlines based on which wave they are included in as follows:

1 February 2024: Fourth group

1 March 2024: Fifth group 1 April 2024: Sixth group

#### Israel



Israel has postponed this requirement of allocation numbers to 5 May 2024 (from January 2024), whereby invoices must be approved and assigned confirmation numbers on invoices valued over NIS 25,000.

#### KSA



Integration of the taxpayer's e- invoicing solutions with GAZT's platform implemented in a number of waves (Wave – threshold) :

1 Jan 2024: Wave 6 - SAR 70 Mil

1 Feb 2024: Wave 7 – SAR 50 Mil

1 Mar 2024: Wave 8 - SAR 40 Mil

1 Jun 2024: Wave 9 – SAR 30 Mil

1 Oct 2024: Wave 10 - SAR 25 Mil

1 Nov 2024: Wave 11 - SAR 15 Mil

1 Dec 2024: Wave 12

#### 2024

## Dom. Republic



Large national taxpayers will be required to implement e-invoicing in phases as follows:

Group 1:15 January 2024

Group 2: 15 March 2024

Group 3: 15 May 2024

## **Philippines**



Mandatory Implementation of E-invoicing for larger taxpayers by 2024.

#### Italy



Entities with revenue or fees up to €25,000 per year will be required to issue and clear e-invoices through SDI as from 1 January 2024.

## **Paraguay**



E-invoicing is mandatory for taxpayers listed in:

Group 7 on 2 January 2024 Group 8 on 1 April 2024

Group 9 on 1 July 2024

Group 10 on 1 October 2024

#### Mauritius



Phase 2, starting in January 2024, mandates businesses to generate MRA-compliant invoices.

Economic operators with an annual turnover exceeding MUR 100 million and who have been notified by the authorities must issue fiscal invoices is 15 May 2024.

## Romania



Mandatory e-invoicing, through the RO e-Invoice system should be required for all B2B transactions made by taxpayers with a fixed establishment in Romania by 1 July 2024.

The e-Transport obligation was extended to international transports (for all type of goods) starting January 2024.

Currently, there is no procedure for the application of the reporting obligation and application of fines is suspended until 1 July 24.

#### **Brazil**



The deadline for implementing the NF3-e in the state of Sao Paulo has been extended to 1 June 2024.

#### Zambia



The Zambian Tax Authorities have commenced the implementation of the new e-invoicing regime called "Smart Invoice". It is expected to be live on 1 July 2024.

#### Panama



As From 1 March 2024, taxpayers holding a Certification of Exception will be required to adopt e-invoicing.

\*DRAFT – Regulations are yet to be approved

# E-invoicing | What does the future hold? – 2024

#### UAE



By Q3 2024, the authorities should make available a draft of the technical requirements of e-invoices, Accredited Service Providers process, and publish the Data dictionary.

#### Denmark

From July 2024, Taxpayers required to comply with DBS will have the ability to issue, receive and store e-invoices. This also includes having a connection to Peppol and Nemhandel.

#### Jordan



Taxpayers who submit corporate income tax returns must register on the Jordanian Income and Sales Tax Department's ("ISTD") online e-invoicing portal by 30 April 2024.

## Spain – Biscayan Territory



Corporate Tax Taxpayers, Taxpayers currently under the income allocation system and micro to medium-sized Corporate Tax Taxpayers who are in the following industries have been granted an extension to issue e-invoices for BATUZ reporting until July 1, 2024:

- Industrial, manufacturing, construction, and transport activities;
- Business and professional financial, legal, rental, insurance, health, and other professional activities, except education and cultural activities.

#### 2024

# Malaysia



Mandatory e-invoicing for taxpayers with sales exceeding RM 100mil (from August 2024).

#### Botswana



As per the 2024/25 budget, the government will be implementing electronic invoicing (E-Billing) for efficient VAT collection.

The implementation is planned to be done over a 3-year period with the first phase scheduled to be completed by December 2024.

#### Kenya



The Kenya Revenue Authority (KRA) has rolled out a few modules that taxpayers can use for eTIMS compliance.

The Revenue Authority has also given a deadline of 31 March 2024 for all taxpayers who are yet to onboard onto the new system to do so.

Such taxpayers are required to comply with the e-invoicing requirements for all transactions from 1 January 2024.

#### Greece



As from 1 January 2024, a QR code is required to be included in the body of sales tax records that are issued either via ERP programs or through the IAPR's "timologio" platform.

Mandatory B2G e-invoicing requirements have expanded to bodies of the Central Administration as from January 2024. Note that when an entity has to adopt e-invoicing for B2G transactions (which must be done through licensed suppliers for e-invoicing), it has to adopt it for all its transactions (i.e. all B2G and B2B)

Starting from 1 June 2024, other contracting authorities and bodies will additionally be obligated to issue e-invoices.

\*DRAFT – Regulations are yet to be approved

# E-invoicing | What does the future hold? – 2025 onward

#### France\*



Starting 1 July 2025, a pilot phase for e-invoicing will be introduced for large scale taxpayers.

#### Slovakia



Introduction of e-invoicing obligation as of 1 January 2025 for B2B and B2C transactions. (postponed indefinitely)

#### Dom. Republic

Large local and medium taxpayers will be required to implement e-invoicing as from May 2025.

#### Romania



As from 1 January 2025, e-invoicing will be extended to B2C transactions, but only in case of entities established in Romania.

#### **Uruguay**

All VAT taxpayers will be required to register for the e-invoicing regime by 1 January 2025.

## Malaysia

E-invoicing will become mandatory as from January 1st for taxpayers with sales exceeding RM 25mil (approx. USD 5M) From 1 July 2025, e – invoicing will be mandatory for all other taxpayers.

#### Latvia\*



As of 1 January 2025, e-Invoicing will become mandatory for B2G transactions.

#### **Paraguay**



Legal entities register as new taxpayers as of 1 Jan 1 2024 must issue only electronic receipts by Jan 1, 2025.

#### Singapore



GST registered businesses will need to transmit invoice data to the government through InvoiceNow.

As from 1 May 2025, any GST registered company may choose to adopt B2B e-invoicing and submission of transaction listings data through Invoice Now.

Newly incorporated companies that voluntarily register for GST to report e-invoices must comply as of 1 November 2025

#### 2025

#### Spain\*



Mandatory B2B e-invoicing will be applicable to entrepreneurs and professionals whose annual turnover is over €8 million. (Current legislation does not exclude non-residents).

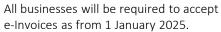
Estimated to be implemented in Spring 2025. To be confirmed.

#### Greece



Mandatory B2G e-invoicing requirements will expand to include expenses of the General Government in January 2025.

#### Germany



# Spain – Biscayan Territory



Professionals, entities taxed under the "income allocation system" ("IAS"), and micro to medium sized corporate income taxpayers who complete wholesale trading activities have been granted an extension to issue e-invoices for BATUZ reporting until **1 January 2025.** 

Micro to medium-sized corporate income taxpayers who provide retail trading, accommodation and food services, reparation of movable properties, hairdressing and other professional services have been granted an extension to issue e-invoices for BATUZ reporting until **1 January 2025.** 

Professionals and entities taxed under the IAS who complete the same activities will follow as from **1 July 2025.** 

#### Spain



The taxpayers, except entrepreneurs or professionals who are obligated to use SII to maintain VAT records, must work with Computerized Billing Systems (SIF) by 1 July 2025 – so called Veri\*factu regulation.

This includes nonexempt corporate and personal income taxpayers with economic activities, non-resident income taxpayers with a permanent establishment, and producers/marketers of computer systems.

#### Egypt



In July,2025 will end the phase to mandate taxpayers to implement E-receipt.

#### Israel



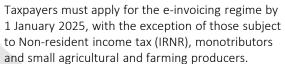
From 1 January 2025, Invoices must be approved and assigned confirmation numbers on invoice amounts over NIS 20,000.

#### Brazil



The SINIEF Adjustment 49 of 2023 postponed the deadline for implementing NFcom, which is the new model for electronic invoices related to communication services. The original deadline has been postponed to 1 April 2025.

## Uruguay



\*DRAFT – Regulations are yet to be approved

E-invoicing | A catalyst for digital transformation

# E-invoicing | What does the future hold? – 2026 onward

## Dom. Republic



Small, micro, and unclassified taxpayers will be required to implement e-invoicing as from May 2026.

## **Belgium**

Mandatory B2B e-invoicing for domestic transactions as of 1 January 2026

#### **Singapore**



All incorporated companies who voluntarily register for GST to report e-invoices must comply as of 1 April 2026.

#### **Poland**



By 1 February 2026, Taxpayers whose turnover exceed PLN 200M in the previous year must issue e-invoices through KSeF.

By 1 April 2026, all other taxpayers will be scoped in

#### Latvia\*



As of 1 January 2026, e-Invoicing will become mandatory for B2B transactions.

#### UAE\*



The phased implementation of an e-invoicing system has been postponed from July 2025 to a potential Go-Live as from 1 July 2026 (Date to be finalized).

#### Israel



From 1 January 2027, Invoices must be approved and assigned confirmation numbers on invoice amounts over NIS 10,000.

## **Germany**



Taxpayers with an annual turnover exceeding EUR 800,000 will be required to issue e-invoices for B2B transactions.

#### France



Small scale business will be required to issue einvoices to their customers as from 1 September 2027.

# 2025

#### Spain\*



Mandatory B2B e-invoicing will be applicable to other entrepreneurs and professionals. (Current legislation does not exclude non-residents).

#### France



All large enterprises to medium enterprises ("GE" and "ETI") will be required to issue e-invoices as from 1 September 2026

# **Spain – Biscayan Territory**



Professionals, entities taxed under the "income allocation system", and micro to medium-sized corporate income taxpayers who provide agriculture, farming, fishing, education and cultural services have been granted an extension to issue e-invoices for BATUZ reporting until 1 January 2026.

Partially or totally exempt corporate income taxpayers and non profit entities covered by Regulation 4/2019 have been granted an extension to issue e-invoices for BATUZ reporting until 1 January 2026.

#### Israel



From 1 January 2026, Invoices must be approved and assigned confirmation numbers on invoice amounts over NIS 15,000.

#### Croatia\*



Taxpayers will be required to issue e-invoices by 1 January 2026.

#### Slovenia\*



Mandatory B2B e-invoicing and e-reporting as of 1 June 2026.

# 2027 / 2028+

#### EU\*



Mandatory e-invoicing for cross-border supplies of goods and services in the EU by January 2028

#### Germany



All taxpayers will be required to issue and receive einvoices for B2B transactions.

#### Israel



From 1 January 2028, Invoices must be approved and assigned confirmation numbers on invoice amounts over NIS 5,000.

\*DRAFT – Regulations are yet to be approved

# E-invoicing: EU roadmap

#### Romania

Mandatory implementation of e-reporting as from **1 January 2024** 

#### **Denmark**

**1 July 2024:** Companies which use a standard DBS, must book digitally from the next new accounting period

#### **Estonia**

Buyers registered as e-invoice receivers may demand suppliers to issue e-invoices

#### Denmark

**1 January 2025**: Companies which use a custom DBS, must book digitally from the next new accounting period

#### Latvia

B2B e-invoice obligation + e-reporting **Timing TBC** 

## **Spain**

Mandatory e-invoicing for large taxpayers. **Timing TBC** 

#### **Poland**

Mandatory KSeF as of 1 February 2026 for entities with turnover > 200 MIO PLN, **1 April 2026** for the remaining entities

#### Slovenia

Mandatory B2B e-invoicing + e-reporting as of **1 June 2026. Timing TBC** 

#### Germany

Businesses with turnover >800 KEUR should issue EN compliant invoices

#### France

Issuance of e-invoices and ereporting for small and medium sized enterprises as of

1 September 2027

## Germany

2028

The remaining businesses should issue EN compliant invoices

2024

#### France

Development of the Public Platform (PPF)

Slovakia: Rumors for a CTC model for a B2G/B2B/B2C

**VIDA** initiative:

Postponement suggested (2 years?)

# Romania

2025

Announced B2C e-invoicing as of **1 January 2025** 

#### France

Pilot phase of the mandate

#### **Germany**

EN compliant e-invoice becomes default. All businesses must be able to receive structured e-invoices.

#### Greece

Planned e-invoicing mandate via MyData platform **Timing TBC** 

#### **France**

2026

All taxpayers must be able to receive e-invoices + mandatory sending and e-reporting for large and mid- sized taxpayers as of **1 September 2026** 

## Belgium

Issuance of e-invoices mandatory for all Belgian established taxpayers as of **January 2026** 

#### Croatia

Introduction of a countrywide mandatory B2B e-invoicing as of **January 2026** 

Still to be confirmed

# Spain

2027

Mandatory e-invoicing for remaining taxpayers. **Timing TBC** 

# **Timing TBC**

EU Mandatory e-invoicing for cross-border supplies of goods and services in the EU by **July 2030.** 

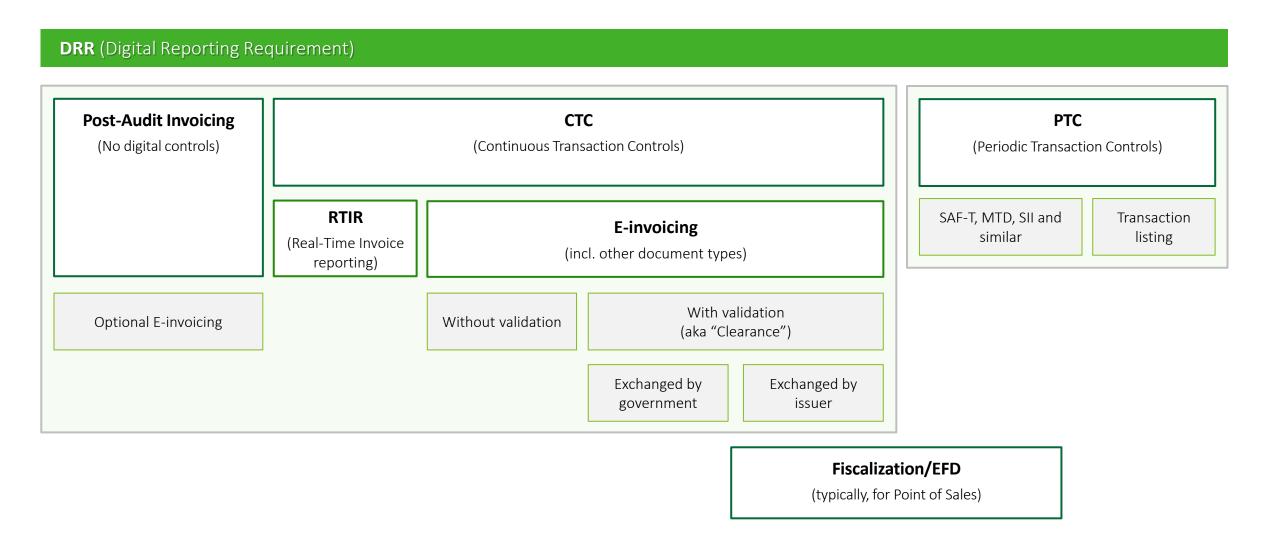
# E-invoicing – No harmonized global regulatory standard to exchange invoices

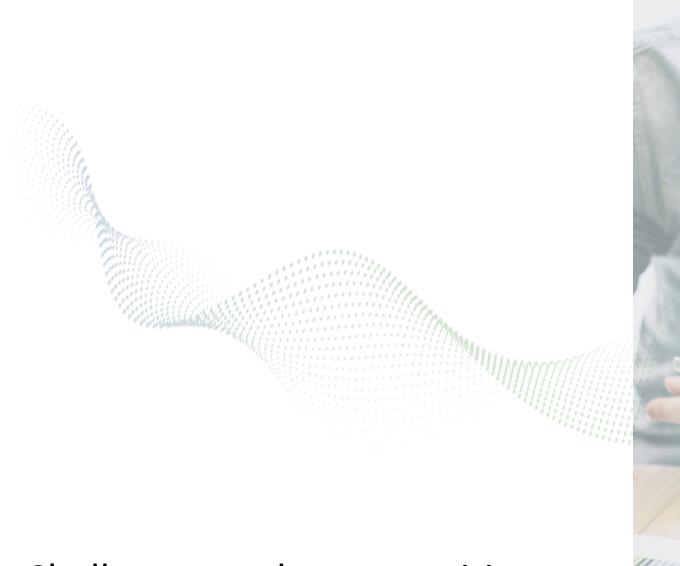
Understanding the four main different regulatory models to exchange invoices between supplier and buyer and the inclusion of the tax authorities

## **Hard clearance** Interoperability Centralized soft clearance Goverment Goverment **Supplier Buyer Supplier Buyer Supplier Buyer** Fully digital exchange of any Government acts as the central hub Approval of transactions pretransaction documents via or gateway through which invoices issuance and validation postmust be validated by using a **interoperability**. No preapproval receipt. from the tax authority is required. predefined infrastructure before The supplier and buyer can trade they are considered fiscally valid. But defined data format by without pre-interference of the tax government: e.g. EN16931 in EU for authorities. ViDA. Egypt India Kenya Germany Turkey



# Obligations go beyond mere e-invoicing





# Challenges and opportunities



# 4. Challenges and opportunities

# Who is impacted?

A wide range of businesses across various industries. The impact largely depends on:



The presence in a given country or region



The nature of the business (B2B/B2G>B2C)



The type of transactions business engage in (local/cross-border/volume)

# Challenges – today

### Important cross-functional impacts

E-invoicing and e-reporting affects various departments Finance, Accounting, Tax, Sales, etc., causing structural changes in a wide variety of processes.

## **Diverse landscape**

Different countries have varying e-invoicing & e-reporting requirements, leading to a complex and evolving regulatory landscape.

#### Increased tax compliance scrutiny

E-invoicing & E-reporting enhances tax authorities' ability to detect non-compliance, possibly leading to more automated audits & penalties.

## Data inconsistency

Multiple data sources, such as ERP systems, can result in inconsistent and poor-quality tax data.

## Lack of strategy

Without a clear vision, strategy, and ownership, clients risk challenges in implementation and future compliance.

# **Opportunities – tomorrow**

#### **Cost savings**

E-invoicing reduces expenses associated with paper, printing, postage, and manual data entry, leading to significant cost savings over time

## **Efficiency gains**

Automated invoicing quickens the billing cycle, enhancing efficiency and enabling tax process automation and improvement.

## **Faster payments**

Quicker invoice processing and delivery result in faster payment cycles, improving cash flow and working capital management.

# Improved accuracy

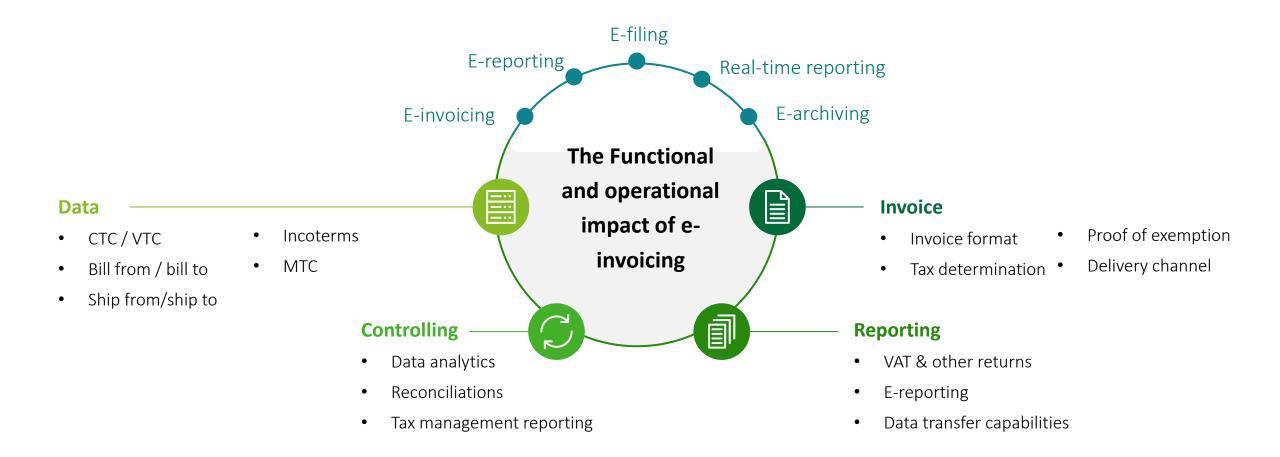
Electronic formats and automated workflows minimize errors, reducing disputes and improving the accuracy of financial data.

## Compliance and audit readiness

E-invoicing systems help maintain accurate records, facilitating retrieval and audit preparation, leading to improved compliance with tax and regulatory requirements.

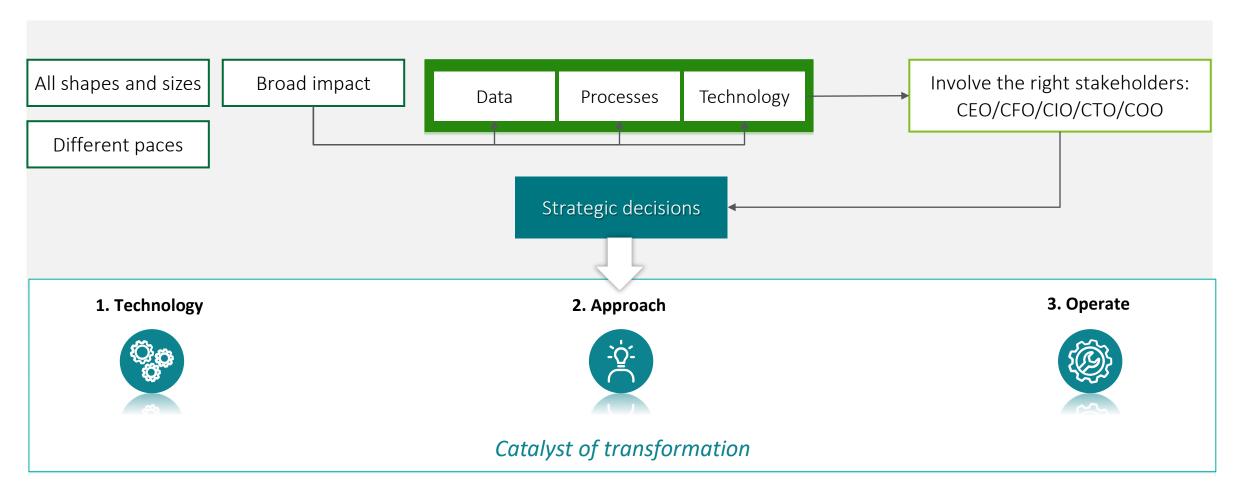
# The impact of a digital reporting project on the tax processes

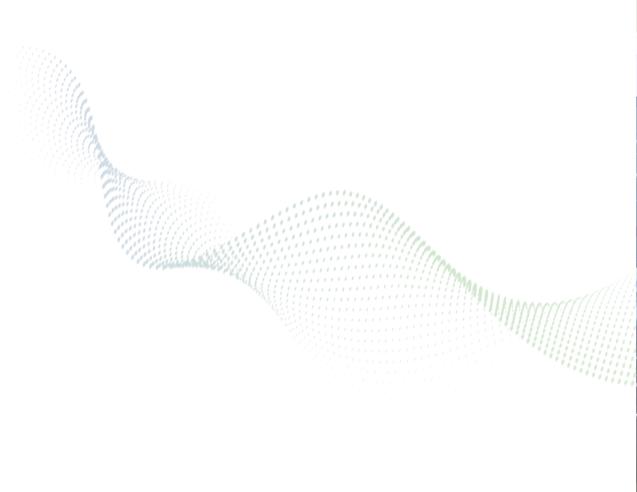
Digital tax transformation



# A business-critical process

# Impact: challenges & opportunities on a business-critical process

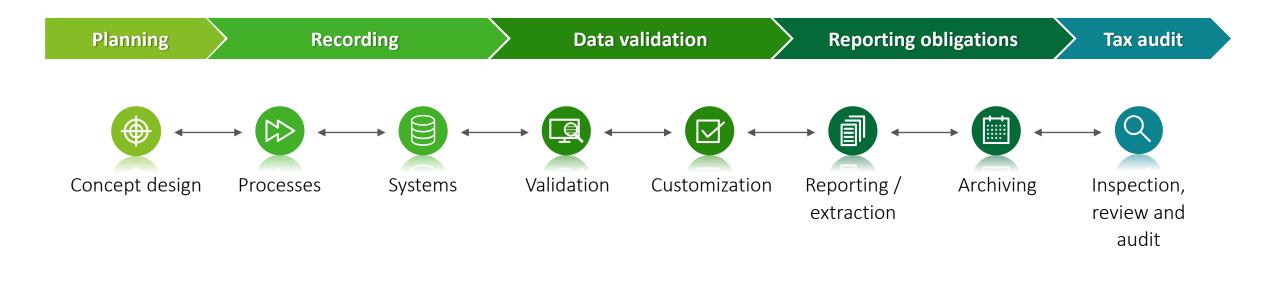




# Impact on system landscape



# End-to-end tax processes

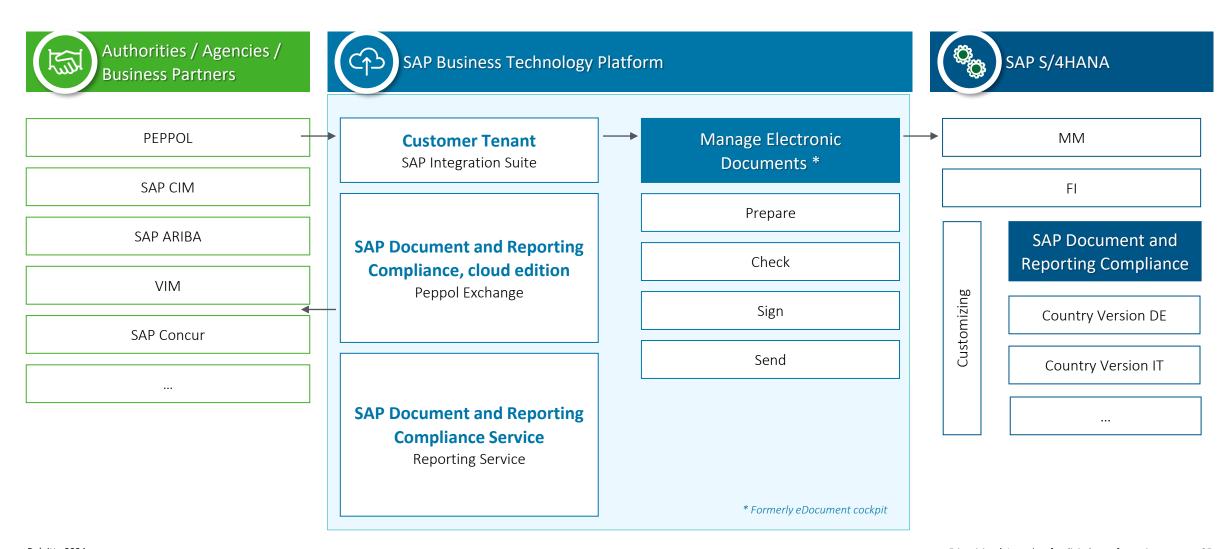


Earlier validation Earlier reporting date

# **Tax Compliance Function – Tax CMS**

# SAP Document and Reporting Compliance

Possible IT Landscape for SAP (S/4 only) for AP

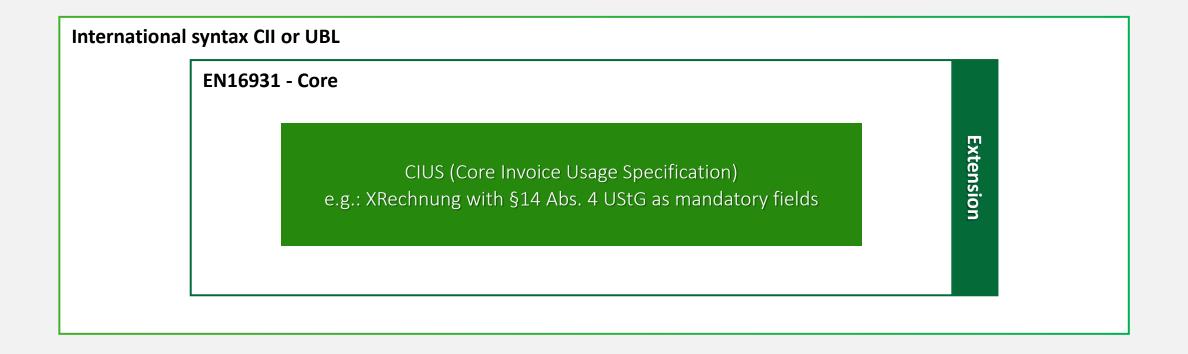


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# **Syntax**

EN16931 – CIUS - Extension

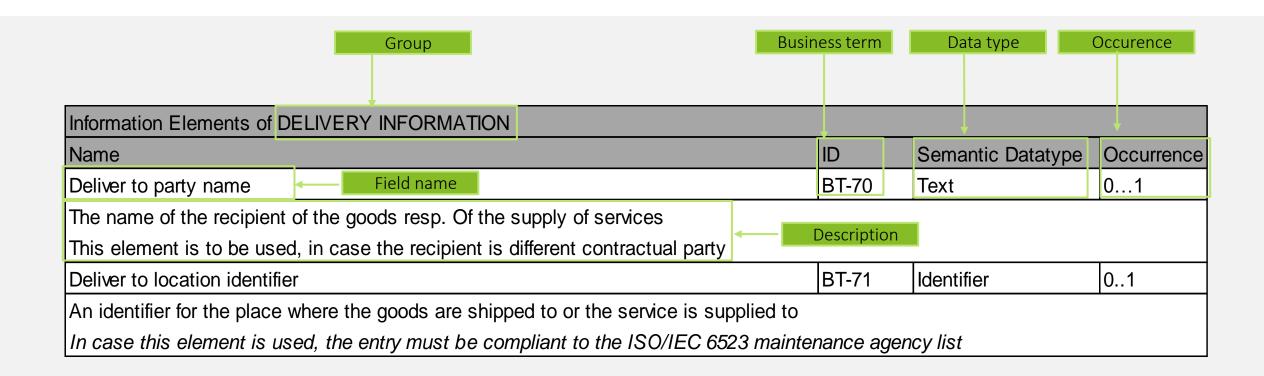
Electronic invoices which follows a CIUS needs to follow the framework of the Core



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# E-invoicing in Germany

Example: XRechnung



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# Team



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