



## VERI\*FACTU AND ELECTRONIC INVOICES WILL AFFECT THE INVOICING IN SPAIN

In the near future, invoicing practices will undergo significant changes as a result of the new Veri\*Factu regulation and mandatory electronic invoicing requirements. These measures are aimed at encouraging the digital transformation of Spanish businesses and putting an end to outdated invoicing methods, such as using non-digital or dual-purpose systems. +

The Veri\*Factu Regulation (Royal Decree 1007/2023, of December 5<sup>th</sup>) requires producers, distributors and users of invoicing systems and software to guarantee the integrity, preservation, accessibility, readability, traceability and immutability of invoicing records, with no omissions or unauthorized alterations that are not properly logged.

This means that every time an invoice is issued, Invoicing IT Systems (SIF) must generate and store a detailed, tamper-proof invoicing record that cannot be modified later without leaving an audit trail. Specifically, these systems must meet the following requirements:

- Integrity: Records must be immutable and linked to an electronically signed digital fingerprint (hash).
- Preservation: Records must be stored for at least 6 years in an accessible and readable format.
- Accessibility: Issued invoices must include a QR code that allows recipients to verify the invoice's data via the Spanish Tax Agency's (STA) electronic portal. Furthermore, although SIFs must be technically capable of instantly submitting these records to the STA (this is strictly what Veri\*Factu refers to), the decision to do so will rest with the users themselves. If they choose not to, the STA may request copies of the invoicing records in electronic format.

This regulation affects two groups:

1. Software manufacturers, developers, and distributors of accounting and invoicing programs, who must ensure that their products comply with these requirements from July 28<sup>th</sup>, 2025.

2. Businesses with a registered office in Spain (except those based in the Basque Country or Navarre), as well as non-residents operating in Spain through a Permanent Establishment. In both cases, when issuing invoices (even if it's only for part of their activity) they must use a SIF compliant with the new regulation.

To comply, businesses must verify that their invoicing software visibly displays a compliance declaration from the software producer before the following effective dates:

- January 1<sup>st</sup>, 2026 for Corporate Income Tax payers.
- July 1<sup>st</sup>, 2026 for all other users (Personal Income Tax payers carrying out economic activities, and Non-Resident Income Tax payers obtaining income through Permanent Establishments).

Exceptionally, taxpayers who already keep their VAT ledgers, either mandatorily or voluntarily, through the Immediate Supply of Information system (SII); those under the Special VAT Scheme for Retailers ("Recargo de Equivalencia") or the Simplified VAT Scheme (modules); and individuals who do not carry out any economic activity, may continue using their current programs without adapting them to the new requirements.

Finally, it is important to differentiate Veri\*Factu from Electronic Invoicing. Electronic Invoicing refers to the obligation to issue, send, and receive invoices in electronic format in commercial transactions between businesses and professionals (B2B). It should be noted that an electronic invoice is not a Word or PDF document sent electronically; it is a structured document in one of the accepted formats: UBL, CII (Cross Industry Invoice), Facturae, or Edifact. At present, these requirements do not apply to intra-community transactions invoicing.

As of today, the implementing regulation is still pending publication. Once published, the deadlines for compliance will depend on the size of the business:

- Businesses and professionals with annual turnover exceeding 8 million euros will be required to issue electronic invoices in B2B transactions within one year of the regulation's publication.
- All other businesses and professionals (with annual turnover under 8 million euros) will have to comply with this obligation within two years from the regulation's approval.



ARCO ABOGADOS Y ASESORES TRIBUTARIOS		VERI*FACTU	ELECTRONIC INVOICING	SII-VAT
<b>Concept</b>		Sets technical requirements for Invoicing IT Systems (SIF) when issuing invoices	Requires issuing, sending, and receiving invoices in electronic format.	Electronic and real-time submission of VAT ledgers.
<b>Affected parties</b>		<ul style="list-style-type: none"> <li>- Manufacturers, developers, and distributors of SIF.</li> <li>- Users of SIF who issue invoices.</li> </ul> Excludes <u>those subject</u> to SII-VAT.	Businesses and professionals involved in B2B transactions. Includes those subject to SII-VAT.	<ul style="list-style-type: none"> <li>- Taxpayers with annual turnover exceeding 6M€.</li> <li>- Those subject to the Special VAT Regimes (REGE and REDEME).</li> <li>- Those who have opted in voluntarily.</li> </ul>
<b>Effective date</b>		<ul style="list-style-type: none"> <li>- July 20<sup>th</sup>, 2025, for manufacturers, developers, and distributors.</li> <li>- January 1<sup>st</sup>, <u>2026</u> for Corporate Income <u>Tax payers</u>.</li> <li>- July 1<sup>st</sup>, <u>2026</u> for other users.</li> </ul>	Pending approval of the implementing regulation. Once approved: <ul style="list-style-type: none"> <li>- 1 year for businesses with turnover over 8M€.</li> <li>- 2 years for all other businesses and professionals.</li> </ul>	July 1 <sup>st</sup> , 2017