



**COMARCH**

## **How to Prepare Your Company for the National System of e-Invoices?**

The National System of e-Invoices (KSeF) – a comprehensive guide for entrepreneurs

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# Introduction

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Poland has been consistently moving towards e-invoicing since the Ministry of Finance started work on launching the National e-Invoice System (KSeF) in 2021. Since January 1, 2022, taxpayers have had the option to voluntarily issue structured invoices, hereinafter referred to as e-invoices. The final introduction of mandatory electronic invoicing will be a consequence of the consent given by the European Commission on June 17, 2022. Although on January 19, 2024, the Ministry of Finance announced the postponement of the date of its mandatory launch, the final date for the commencement of the obligation to use KSeF is not yet known.

Given the widespread impact of this change on Polish entrepreneurs, it is crucial to understand how to prepare for KSeF. Once it becomes compulsory, B2B (Business-to-Business) and B2G (Business-to-Government) e-invoices will be required to be issued through KSeF, replacing traditional paper invoices and existing electronic formats.



# 1. What Is KSeF?

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## 1.1 KSeF – Definition

The National e-Invoice System (KSeF) is an IT system for issuing, receiving, and storing e-invoices. Prepared by the Polish Ministry of Finance, the system is expected to unify the way businesses settle accounts, improve communication between taxpayers and the tax administration, as well as prevent tax fraud.

Upon the enforcement of mandatory electronic invoicing in Poland, the only permissible method for documenting transactions between entrepreneurs (B2B) and involving public authorities (B2G) will be the issuance of e-invoices within the KSeF framework. The obligation to issue e-invoices via KSeF will apply to taxpayers performing activities required to be invoiced according to Polish VAT regulations who have a registered office or permanent place of business in Poland (when this permanent place of business participates in the supply of goods or services) with a few exemptions, including optional VAT RR (flat-rate) invoices.

Following public consultations, the Polish Ministry of Finance has decided to exempt consumer transactions (B2C) from from new e-invoicing regulations

Due to new regulations, the existing system for handling e-invoices in public procurement using the PEF (Electronic Invoicing Platform) will now have to adapt to changes under the Electronic Invoicing Law. Invoices issued in the PEF will first have to undergo validation and obtain a KSeF/UPO number to be later made available to the invoice issuer in the PEF, thus ensuring interoperability between the two systems (KSeF and PEF).

## 1.2 KSeF – Structured Invoices

According to the VAT Law, a structured invoice is an invoice issued through KSeF and assigned an identification number (KSeF ID). Unlike a regular electronic invoice, e.g., a document in any digital form, the structured invoice has an XML format that follows the logical structure of the FA(2) e-invoice and abides by specific standards regarding information sharing (including vendor data or type of service provided).

Taxpayers can issue structured invoices using a platform prepared and provided by the Ministry of Finance or a commercial system. An e-invoice is considered issued on the date it is sent to KSeF, whereas received – on the date it is assigned a KSeF ID number. Each e-invoice will be archived in KSeF for a period of 10 years.

## 1.3 What Are the Benefits of KSeF?

The decision to adopt mandatory e-invoicing in Poland comes as no surprise, as the trend has already been taking Europe by storm, with more and more countries opting for more detailed monitoring of transactions for VAT purposes.

Mandatory e-invoicing is already in force in Italy, Serbia, and (partially) Romania. Belgium, France, Spain, and Germany are also preparing for the e-invoices revolution. Why? Because the structured invoices bring about many benefits – both for the country and its taxpayers.

From the tax administration standpoint, mandatory e-invoicing will provide more effective monitoring of invoice turnover and thus enable automatic checks on the value of VAT declared and paid. This will result in better compliance with tax regulations and greater control efficiency, as well as tighten up the VAT system and increase state budget revenues from this tax.

What's more, by unifying invoice formats, eliminating paper use, and replacing PDF e-invoices with structured ones, mandatory e-invoicing will impact economic turnover.

### **The change will also result in benefits for taxpayers, which will include:**

- Improved business conditions and security through process automation
- Simplification of the performance of tax obligations, including speeding up VAT refunds from 60 to 40 days, which will translate into liquidity for companies
- Lower risk of human error
- Faster documentation of transactions, automating the circulation of invoices between taxpayers and their posting and receipt of payments
- Exemption from the obligation to prepare JPK\_FA for transactions covered by e-invoicing
- Security of storage and access to the content of e-invoices

## 2. KSeF for Entrepreneurs

### 2.1 How to Prepare for KSeF?

Transitioning to electronic invoices will probably involve numerous changes for your business, so it's best to start preparing for them now. Due to the need to issue invoices through the KSeF platform and create them in accordance with a specific XML structure, many Polish companies – especially large ones – will be facing a revolution in their day-to-day operations.

To deal with it as smoothly as possible, it's good to start with an analysis of what the invoicing process looks like in your company right now. It may also be a good idea to create a dedicated team that will be responsible for employee training and adapting to KSeF.

How will the new system work? What pitfalls will you need to watch out for? Keep reading for more practical tips on KSeF use.

### 2.2 KSeF – Issuing an Invoice

#### Who is responsible for issuing an invoice?

KSeF can be used by both individuals and entities other than individuals. In the case of taxpayers who are natural persons, the primary authorization of an ownership nature is automatically assigned to the person who is the taxpayer, and such a person can use KSeF without reporting to the tax office. The same is true for taxpayers who are not natural persons but have an electronically qualified stamp containing the VAT ID. Otherwise, it is necessary for a company to submit a ZAW-FA notice to the tax office, in which the entity designates a specific individual to use KSeF.

#### How do you deliver an invoice?

An e-invoice can be issued using free tools provided by the Ministry of Finance. This solution will be dedicated to entrepreneurs managing small amounts of documents. For larger taxpayers issuing a large number of invoices, it is recommended to use commercial solutions to automate processes.

#### What data does an e-invoice have to contain?

The electronic invoice has a specific structure of an XML file with an e-invoice logical template in XSD format, according to which it should be completed. However, although the form has about 500 fields, the scope of mandatory elements has not increased with respect to those specified by the VAT Law.

**The Ministry of Finance defines four types of fields in the XML file schema, which are:**

- Mandatory fields, such as VAT ID and name of the seller or recipient, without which the XML file will not be qualified as an invoice
- Logical fields, the filling of which is dependent on the filling of another field on the invoice, e.g., if we indicate that a particular service benefits from VAT exemption, in the next place, we will be required to indicate the legal basis for this exemption
- Optional fields, such as items that will be filled in if certain conditions in the law are met, e.g., fields required for a VAT RR invoice
- Optional fields, such as items whose completion is voluntary and depends on the invoice issuer

## **Does KSeF support attachments to invoices?**

KSeF does not provide for the possibility of adding attachments to e-invoices. However, it is possible to place a link to an attachment on an e-invoice in the AdditionalDescription and AdditionalInfo fields or possibly in the footer of the invoice. This is not recommended, though, due to security issues.

Attachments can also be transmitted separately outside KSeF. Thanks to the integration with the external Comarch EDI system, it is possible to transfer them to the counterparties indicated by the customer together with the previously issued e-invoice in KSeF.

## **2.3 KSeF – Receiving an Invoice**

### **How does a recipient receive an invoice?**

The e-invoice issued by the vendor is automatically available in KSeF for the recipient, so the recipient doesn't need access to the KSeF ID number. After logging in to the KSeF platform, there are two options for receiving the invoice: downloading the file and manually entering it into the ERP system or using the available API interface supported by Comarch EDI.

### **Is the recipient notified about every invoice sent to him through KSeF?**

Since most taxpayers receive a large number of invoices, the Ministry of Finance has decided not to inform them about each new one, because this could be more of a hindrance than a convenience for taxpayers receiving a high volume of invoices.

Therefore, in order to obtain information about available invoices, the taxpayer will be required to log into the portal and download the invoice file manually or use the software that will 'ask' KSeF about available e-invoices.

### **When is the invoice considered 'received'?**

The legislator establishes that an invoice is considered as 'received' or 'delivered' the exact moment it is assigned the KSeF ID number, regardless of when the recipient actually downloads the invoice.

## 2.4 Foreign Entities vs. KSeF

Foreign entities without a registered office or permanent place of business in Poland are not required to issue invoices in KSeF.

Therefore, as a rule, foreign invoices should be delivered to the foreign buyer in a manner agreed upon by the parties (e.g., PDF).

Notwithstanding the above, a foreign entity without a registered office and permanent place of business in Poland will have the option to issue an invoice in KSeF voluntarily.

## 3. KSeF Supported by Technology

### 3.1 How Can Technology Aid Integration With KSeF?

Integrating with KSeF in-house requires adequate IT resources and advanced technological expertise. Operating the new system can turn particularly problematic in large companies, where the transition to e-invoicing will involve significant interference with infrastructure and business processes. That's why so many Polish firms are showing great interest in experienced EDI solution providers who offer seamless integration with the government's system and – subsequently – an easier adaptation to the new reality of e-invoicing.

### 3.2 Comarch EDI

As an electronic document exchange operator with more than 20 years of experience in the EDI and e-invoicing market, Comarch has been heavily involved in the KSeF project from the very beginning. Today, we are ready to support companies in the efficient handling of structured invoices by integrating KSeF with our Comarch EDI platform. Our cloud-based SaaS model B2B platform was designed to enable dynamic data exchange between you and your trading partners. Implementing Comarch EDI will ensure that you are fully compliant with the latest regulations and have a transparent flow of all invoices with their statuses.



## 3.3 Comarch EDI – Integration With KSeF

### Models of integration

Comarch EDI users can use one of two models for connecting with the government's KSeF. The first one involves invoice exchange and basic validation (checking the compliance of invoices with KSeF). The second, on the other hand, includes a so-called business validation required by the contractor as well.

### How does the Comarch EDI KSeF service authorize the taxpayer in KSeF?

Comarch EDI KSeF uses an authentication token as an authorization method to initiate a session on behalf of the taxpayer. It is possible to generate the token either directly through Comarch tools or by using the taxpayer application provided by the Ministry of Finance.

A token generated this way is linked to the authentication vector used to establish the session in which it was generated and can only contain a subset of the roles of that vector, i.e., the permissions assigned to the token can be narrowed.

### How does your enterprise system communicate with Comarch EDI KSeF?

There are a couple of ways to connect your company's financial and accounting system with Comarch's tools – for example, through SFTP and AS2, both of which guarantee a safe transmission of data.

### How long does it take to transmit e-invoices to KSeF through Comarch EDI KSeF?

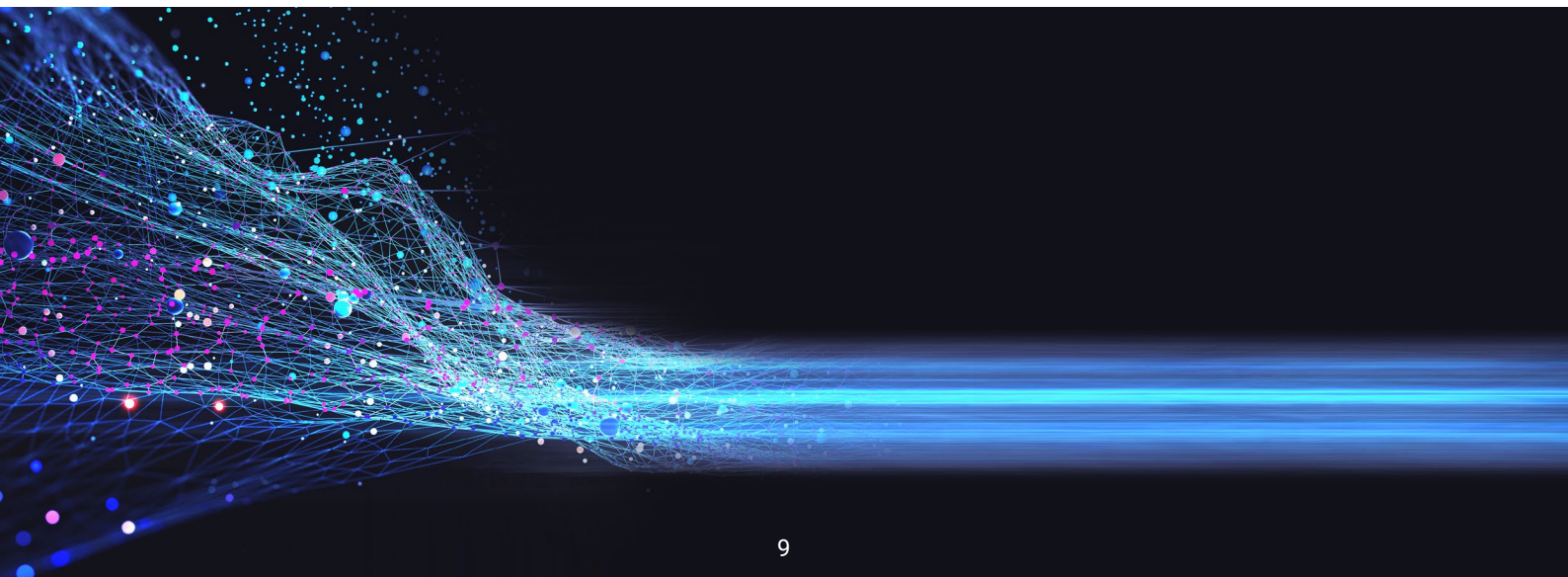
Invoices are transmitted automatically right after being sent by a customer. The whole process is very fast and requires minimal effort on your side. Comarch EDI forwards structured invoices to KSeF via API, enabling full automation of KSeF handling.

## 4. Summary

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The National System of e-Invoices will revolutionize the billing and B2B document exchange processes in Poland. The changes will come into force very soon, which is why you shouldn't wait to start familiarizing yourself with tools for automating KSeF in your enterprise – such as Comarch EDI KSeF. Our platform will allow you to easily maintain business continuity during the introduction of the new system and provide you with full compliance with current regulations.

Get your EDI exchange up to speed – learn more about Comarch EDI KSeF system [here](#).



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