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ELYSIAN CONSULTING GROUP

YOUR COMPLIANCE PARTNER IN THE UAE

# WEEKLY NEWSLETTER

## UAE FINANCE UPDATE

Your guide to key finance and compliance updates in the UAE.

### INSIGHTS



# UAE E-INVOICING

THE FUTURE IS COMPLIANT. ARE YOU READY?


CHOOSING THE **RIGHT ASP** IS A STRATEGY DECISION, NOT A SHOPPING LIST.

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# UAE E-INVOICING: THE PRE-APPROVED ASP LIST GROWS TO 41

*WHAT IT MEANS FOR YOUR BUSINESS*

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## Pre-Approved vs. Accredited

- **Pre-approved (Article 15):** The MoF confirms baseline eligibility – active Peppol certification, AS4 connectivity, required agreements. Provider can participate in pilot and testing activities.
- **Fully accredited (Article 16):** Granted separately, only after the provider completes the MoF's full accreditation testing – proving its system can handle real transaction volumes, validate against the PINT AE schema, and report to the FTA without errors.
- **Practical takeaway:** A name on the list is necessary but not sufficient. Before you sign, ask the provider directly where they stand in the Article 16 accreditation process and whether they are cleared for production – not just pilot.

## How the ASP Model Works

The UAE has adopted a Peppol-based, five-corner model. You will not connect to the FTA directly. Instead, your system hands invoice data to your ASP, which:

- **Validates** the invoice against the PINT AE structured XML standard;
- **Routes** it across the Peppol network to your customer's ASP; and
- **Reports** the tax data to the FTA in near real time, in parallel.

A PDF emailed to a client is not an einvoice. Neither is a scan or a paper original. Only structured data exchanged through an accredited ASP in the approved format will count.

The UAE's move to mandatory e-invoicing has taken another concrete step forward. The **Ministry of Finance (MoF)** has expanded its official list of **pre-approved e-invoicing Service Providers (ASPs)**, which now stands at **41 providers** as of June 2026 – and the list is still growing.

For businesses operating in the UAE, this is more than a piece of news to scroll past. Your ASP is the single mandatory link between your accounting system and the Federal Tax Authority. Choosing one is becoming an urgent, board-level decision – not an IT afterthought.

## What Your Business Should Do Now

1. **Confirm your phase.** Above or below AED 50M in revenue? That sets your real deadline – and large businesses have less runway than the date suggests.
2. **Shortlist on accreditation status, not just the list.** Ask each provider where they are in the Article 16 process and whether they are production-ready.
3. **Check ERP fit.** A native connector to your accounting system (Tally, Zoho, SAP, QuickBooks) saves far more than a first-time custom bridge.
4. **Clean your master data first.** Most rejected invoices fail on dirty data – wrong TRN, missing buyer Peppol ID, mismatched tax classification. At AED 100 per rejection, sloppy data becomes a recurring tax.
5. **Treat onboarding as a project, not a signature.** Data mapping, testing and process change take weeks, not days.


*The list tells you who is allowed to operate. It does not tell you which provider belongs between your ERP and the FTA for the next five years.*

# CHOOSING THE RIGHT ASP IS A STRATEGY DECISION, NOT A SHOPPING LIST

*AN **ELYSIAN CONSULTING GROUP** PERSPECTIVE ON UAE E-INVOICING READINESS*

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## Why Selecting an ASP Is Harder Than It Looks

An ASP is not optional middleware you can route around. It is the **only authorised channel** between your accounting system and the Federal Tax Authority. Every inscope invoice, for years, will pass through it. A wrong choice is not a software licence you swap out next quarter – it is embedded in your finance operations, your month-end close, and your compliance record

Three traps catch unadvised businesses:

- **Mistaking pre-approval for accreditation.** Being on the MoF list (Article 15) means a provider can test. Only full accreditation (Article 16) clears them for production. Sign with a provider that never completes accreditation and you have built your compliance chain on sand.
- **Buying on price or brand name.** The cheapest headline rate or the most familiar logo rarely maps to the lowest total cost once integration, rejections and support are factored in.
- **Ignoring their own data readiness.** Most rejected invoices fail not because of the ASP, but because of dirty master data – a wrong TRN, a missing buyer Peppol ID, a mismatched tax classification. At AED 100 per rejection, that becomes a recurring, self-inflicted tax.

The Ministry of Finance has now pre-approved **41 e-invoicing Service Providers (ASPs),** and the number keeps climbing. For most finance teams, the instruction that follows sounds simple: pick one from the list before the deadline. That simplicity is the trap.

Every provider on the MoF list clears the **same** compliance floor – PINT AE validation, Peppol routing, near-real-time FTA reporting. The list tells you who is allowed to operate. It tells you nothing about who fits your business, your ERP, your VAT position, or your transaction volumes. That gap – between approved and right for you – is exactly where businesses make expensive, multi-year mistakes.

This is where Elysian comes in. We sit on **your** side of the table, not the vendor's

## Elysian's Role: A Buyer-Side Selection Framework

We don't resell software and we aren't tied to any provider. Our job is to translate a 41-name list into a defensible, documented decision. We do that in four stages.

### 1. Scope and Phase Assessment

We first establish where you actually stand:

- **Above or below the AED 50M revenue threshold?** That sets your real appointment deadline – 30 October 2026 for large businesses, 31 March 2027 for the rest.
- **Which transaction flows are in scope** (B2B, B2G) and which are not yet (B2C)?
- **What is your invoice volume,** your entity structure, and your crossborder footprint?

This stage alone often corrects a dangerous assumption: large businesses routinely believe they have until 2027, when their effective runway – once onboarding and testing are counted back from go-live – is far shorter.

CONTINUE

## What You Avoid By Getting Advice First

The penalties under Cabinet Decision No. 106 of 2025 are real – AED **5,000 per month** for failing to appoint on time, **AED 100 per invoice** not transmitted, and daily fines for unreported system failures. But the fine is the visible cost.

The expensive cost is a botched go-live where invoices reject at volume while your finance team firefights an integration that was never ready – the monthly and perdocument fines stacking the whole time. A structured selection and a clean onboarding is the cheapest insurance against that scenario.

## The Elysian Difference

The MoF list tells you who is allowed to operate. It does not tell you which provider belongs between your ERP and the FTA for the next five years. That decision is yours – but you don't have to make it alone, or blind. Elysian brings the tax expertise, the buyer-side independence, and the implementation oversight to turn a compliance obligation into a decision you can stand behind.

We help UAE businesses read the MoF list properly, choose a provider that fits, and get their data ready before onboarding begins. The list tells you who is allowed to operate. We help you choose who actually fits.

*The list tells you who is allowed to operate. Elysian helps you choose who actually fits – your ERP, your VAT position, your transaction volumes, and your go-live timeline.*

### 2. Requirements Mapping

We translate your operations into selection criteria that matter:

- **ERP and accounting fit.** A native, proven connector to your system – Tally, Zoho, SAP, QuickBooks – saves far more in integration time than a bridge built for the first time on your project.
- **VAT and tax position.** Your provider must handle your specific supply types, RCM scenarios, and credit-note flows correctly.
- **Volume and pricing model.** Per-document, tiered or flat – the right structure depends entirely on your invoice profile.
- **Cross-border needs.** If you trade across KSA or the wider GCC, a provider already live in multiple Peppol jurisdictions avoids a second vendor.

### 3. Requirements Mapping

This is the question most buyers skip, and the one we ask first: Where are you in the Article 16 accreditation process, and are you cleared for production?

We then stress-test each shortlisted provider on:

- **Accreditation status** (not just pre-approval)
- **Security and continuity standards** (ISO/IEC 27001, ISO 22301)
- **Uptime, outage handling,** and support responsiveness at month-end
- **Real references** for businesses of your size and sector

### 4. Data Readiness and Onboarding Oversight

Selecting the provider is the start, not the finish. Before go-live, we help you:

- **Clean and validate master data** – TRNs, Peppol IDs, tax classifications
- **Map data fields** to the PINT AE schema
- **Plan and supervise testing** through the pilot window
- **Build the internal process changes** so e-invoicing fits your close, not the other way round

# YOUR COMPLIANCE CALENDAR

Refreshed for the next **11** months.

| DATE | WHAT'S DUE / WHAT KICKS IN |
|---|---|
| **15 Jun 2026** | Final deadline for filing Excise Tax return. |
| **29 Jun 2026** | Monthly VAT return for May 2026 due. |
| **30 Jun 2026** | Emiratisation H1 deadline: +1% growth for 50+ employee firms. Q2 2021 VAT credits expire. |
| **1 Jul 2026** | UAE e-Invoicing Pilot Programme begins. Emiratisation penalties (up to AED 108K/yr per gap) start. |
| **28 Jul 2026** | Quarterly VAT return for Apr–Jun 2026 due. |
| **30 Sep 2026** | Corporate Tax return due for entities with 31 Dec 2025 year-end. Q3 2021 VAT credits expire. |
| **30 Oct 2026** | ASP appointment deadline for businesses with revenue ≥ AED 50M (extended from 31 July). |
| **31 Dec 2026** | Cliff: pre-2021 VAT credits, Small Business Relief, +2% Emiratisation rate all due. |
| **1 Jan 2027** | Mandatory e-Invoicing go-live for businesses ≥ AED 50M. Per-invoice penalties begin. |
| **31 Mar 2027** | Deadline for businesses < AED 50M to appoint an ASP. |

## LET'S TALK

**Book a free 30-minute Corporate Tax Filing Readiness**

If you have a 31 December 2025 year-end, your CT return is due 30 September 2026 – about four months away. We'll review your trial balance, transfer-pricing exposure, QFZP positioning, related-party schedules and the readiness of your working-paper file. You leave with a written gap list and a clear filing plan – no obligation

*To book, write to me directly:*

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