



Poland's Digital Compliance Journey: Preparing for 2026

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Speakers



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Serra Emekli is an Account Manager. She is responsible for international account management, focused on conducting SAP projects all around the world.



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Evşen Güleç is a Regulatory Affairs Associate. She is diligently following the regulatory updates around the world and working closely with the Business and Development teams as well as the Sales team.



Agenda



Introduction to SNI



KSeF Fundamentals



KSeF and VAT Reporting: How JPK_VAT Completes the Picture



Final Checks for 2026: Key Takeaways from the December 2025 Implementing Regulations



How can SNI Help You?



Q&A

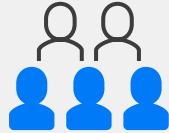
About SNI



Founded in
2006



30+
country
solutions



~100
employees



1000+
clients
(85% multinationals)



10
offices/partners
across Europe

Spain



500

Technology Fast 500
2016 EMEA



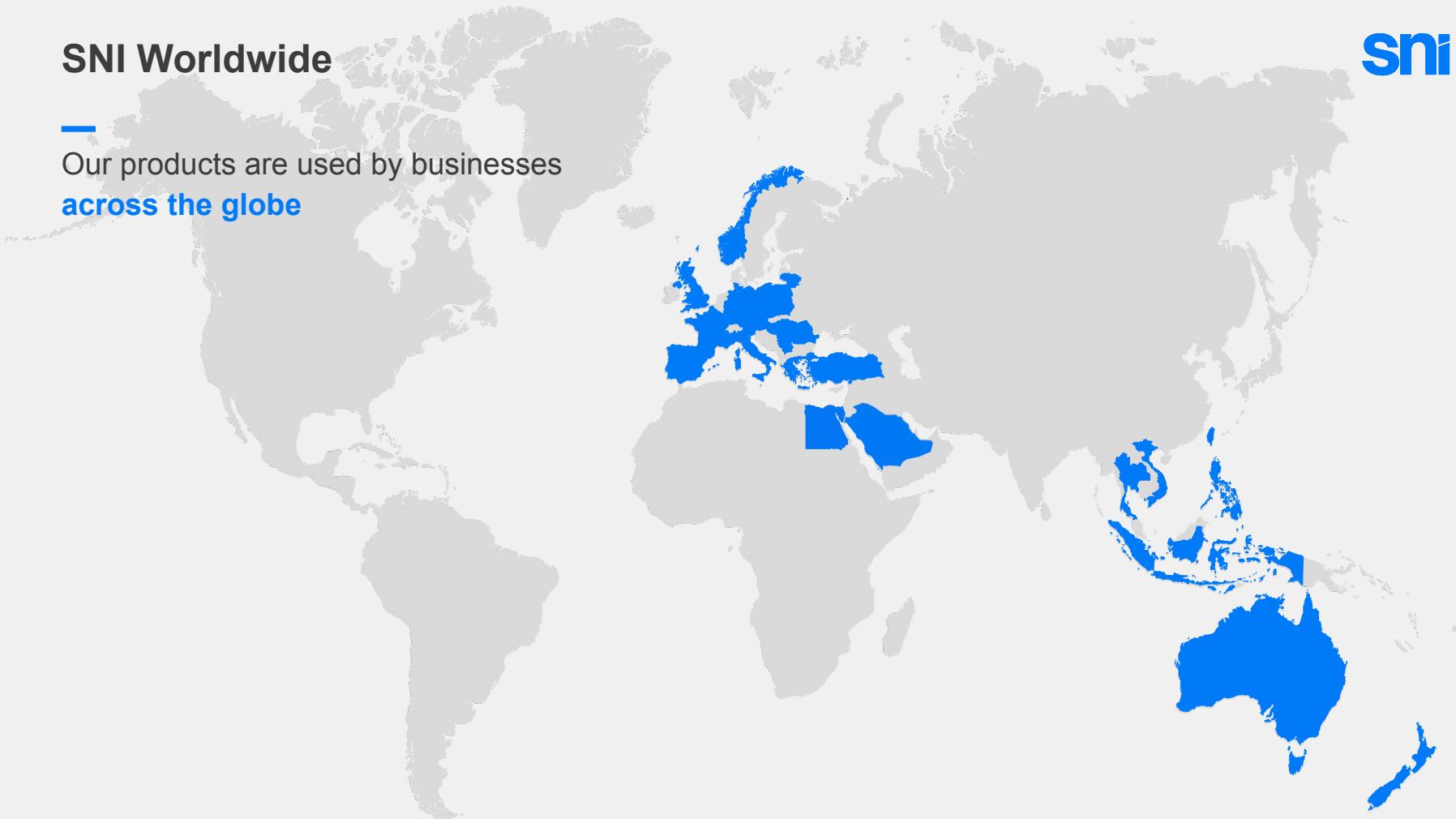
GENA



SNI Worldwide



Our products are used by businesses
across the globe



Our Clients



FERRERO



GUESS

dyson

Prysmian
Group



Honeywell

signify

ADIENT

beko

Autoliv

FUJIFILM

VESTEL

CONAIR

KOROZO
FLEXIBLES

HAYES LEMMERZ

MULTIVAC

YAZAKI

Marshall

Epta

COATS

B BRAUN

Otokar

GEFCO



B2B E-Invoicing in Poland

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The E-Invoicing Landscape in Europe: Trending Countries in 2026



Belgium — **B2B e-invoicing** (1 Jan 2026 full mandatory PEPPOL rollout)



Poland — **B2B e-invoicing** (Feb/Apr 2026 KSeF go-live for all taxpayers)



France — **B2B e-invoicing & e-reporting** (Sept 2026 receiving + issuing for large/medium)



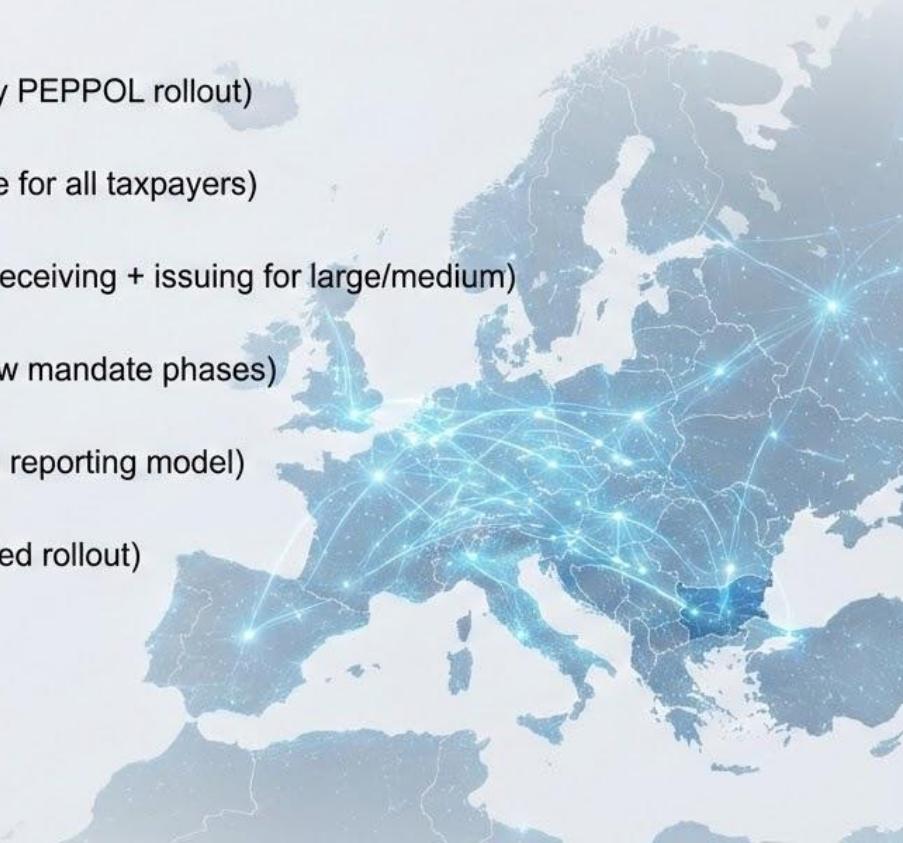
Greece — **E-invoicing expansion** (Feb & Oct 2026 new mandate phases)



Croatia — **Fiscalization 2.0** (2026 launch of new digital reporting model)



Bulgaria — **SAF-T** (2026 start for large taxpayers, phased rollout)



KSeF Fundamentals: What the System Is and How It Works

What KSeF Is



KSeF is a government-operated platform for issuing, receiving, and storing structured invoices. Legal issuance of an invoice occurs only upon successful system validation and acceptance.

How It Works



Invoices must be generated in **XML format** compliant with the FA logical structure and validated by KSeF, with legal issuance occurring only once a KSeF number is assigned.



KSeF supports **API-based** sending and receiving of invoices, enabling automated ERP and accounting processes.



System access requires authentication via tokens or KSeF certificates, with permissions centrally managed and linked to taxpayer identifiers such as NIP or PESEL.



Invoices shared outside KSeF, including PDFs or printouts, must display the **KSeF number** and a **QR code** to enable verification and access to the authoritative invoice in the system.



KSeF becomes **mandatory** in **2026**, with KSeF 2.0 and the FA(3) logical structure applying from 1 February 2026 following the phased go-live timeline.

End-to-end process



Invoice creation in ERP



Submission to KSeF



Validation



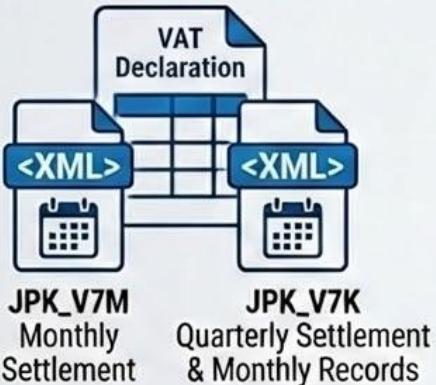
Assignment of a KSeF number



Availability to the buyer

KSeF and VAT Reporting: How JPK_VAT Completes the Picture

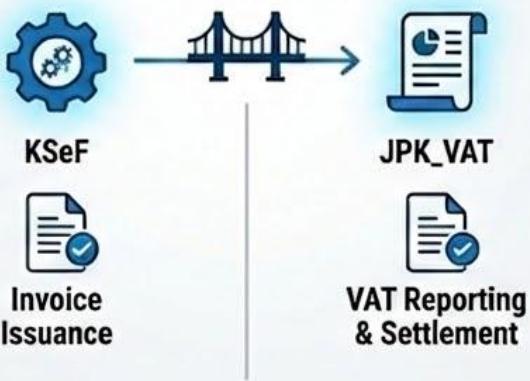
JPK_VAT Structure: JPK_V7M and JPK_V7K



- Both formats combine VAT sales and purchase records with the VAT declaration in a single structured XML file.
- The structure includes transaction-level data, VAT rates, GTU codes, and procedural markings.

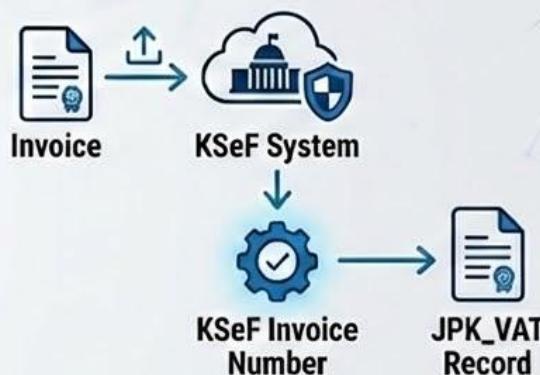
Why JPK_VAT Matters in the KSeF Environment

KSeF governs invoice issuance, while JPK_VAT governs VAT reporting and settlement.



Together, they ensure consistency between transactional data, VAT records, and the final VAT return.

Integration Between KSeF and JPK_VAT



Invoices issued via KSeF are assigned a unique KSeF invoice number at the moment of system acceptance.

This number must be reported in JPK_V7M and JPK_V7K records, enabling direct linkage between invoicing and VAT reporting.

Final Checks for 2026: Key Takeaways from the December 2025 Implementing Regulations

December Regulations operationalize the mandatory framework by clarifying edge cases and execution rules.



Clarification of Exclusions and Special Cases

- The regulations define limited cases where issuing structured invoices is not required.
- These exclusions are technical and transaction-specific, not optional simplifications.



Operational Rules for Using KSeF

- Detailed rules cover authentication, authorizations (including ZAW-FA), offline issuance modes, and invoice attachments.
- Requirements for QR codes and invoice sharing outside KSeF are explicitly defined.



Alignment with JPK_VAT and Transitional Provisions

- The regulations align KSeF invoicing with JPK_VAT reporting requirements.
- Transitional rules aim to avoid parallel obligations while ensuring audit traceability from February 2026.

Timeline of KSeF releases:

- 1.09 KSeF 1.0 - decommissioning of the test environment
- 30.09 API KSeF 2.0 - release on the test environment
- 1.11 Certificates and Permissions Module (MCU) - launch
- 15.11 KSeF 2.0 Taxpayer Application - release on the pre-production environment
- 1.01 Module for invoice notifications with attachments on e-US - launch
- 1.02 KSeF 2.0 for large enterprises and invoice recipients
- 1.01 KSeF 2.0 for previously exempt enterprises (up to 10k PLN monthly)

SEPTEMBER

2025

- 24.09 Wednesdays with KSeF - free training

OCTOBER

- 15.10 API KSeF 2.0 - release on the pre-production environment

NOVEMBER

- 3.11 KSeF 2.0 Taxpayer Application - release on the test environment

JANUARY

2026

- 26–31.01 technical break of the KSeF 1.0 production environment

FEBRUARY

APRIL

2027

WE ARE
HERE

- 1.04 KSeF 2.0 mandatory for remaining enterprises



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How can SNI help you?

Real Time e-Invoicing TDS

SNI SAP Solution

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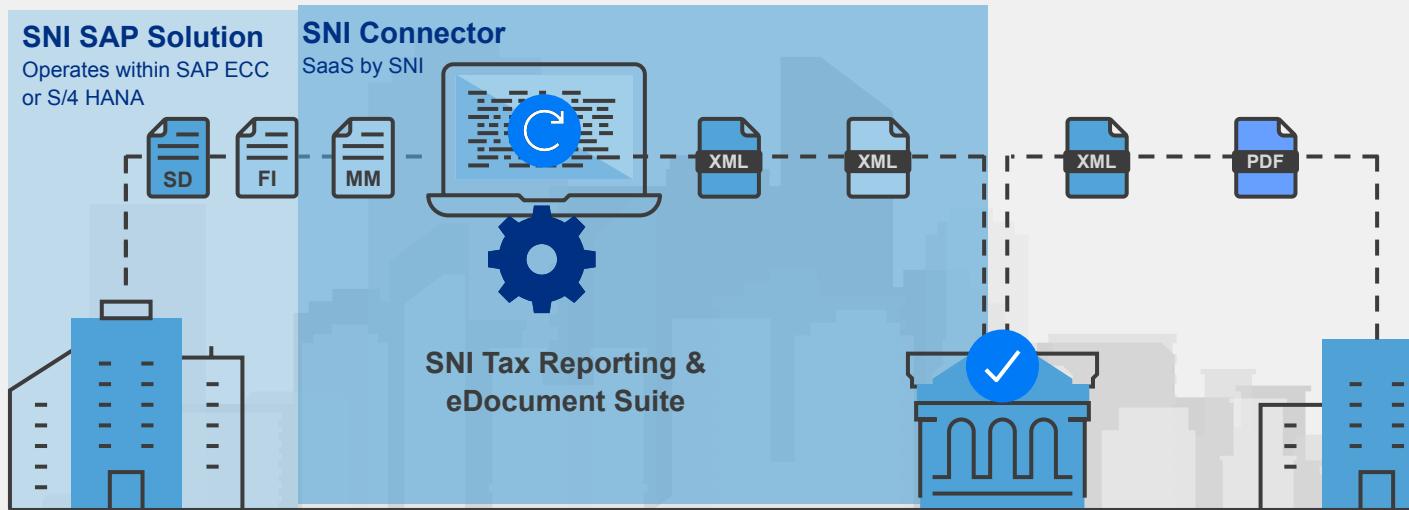
Simple, automated extraction Seamless Cloud Update & Configuration Seamless Submission Validate file and transmit



VAT, Reconciliation etc.

Easy user monitoring

Less objects, no transportation



Business

Tax Authority

Recipient

Real Time e-Invoicing

e-Doc Suite



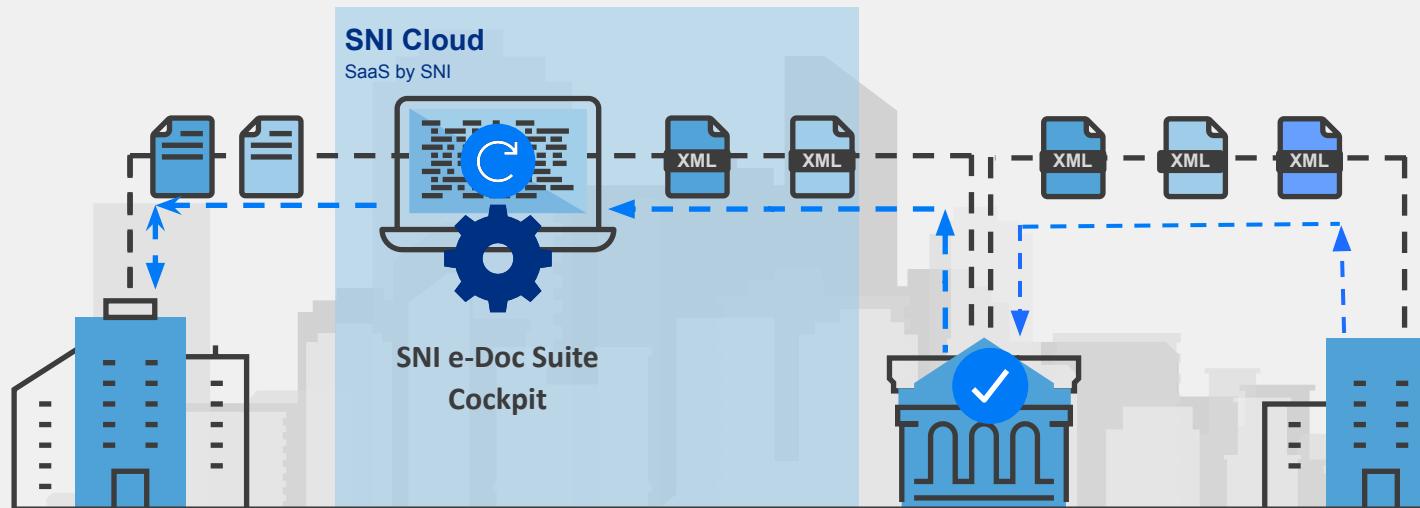
Extract financial data Create required files Submit to tax authority Validate file and transmit

With external template

Simple user monitoring

Seamless submission

Validate file and transmit



Buyer

ERP (Oracle, Microsoft Dynamics, etc.)

POS systems and devices

Tax Authority Portal

Seller

Inbound (Receiving) Flow
Outbound (Sending) Flow

Communication

e-Doc Suite

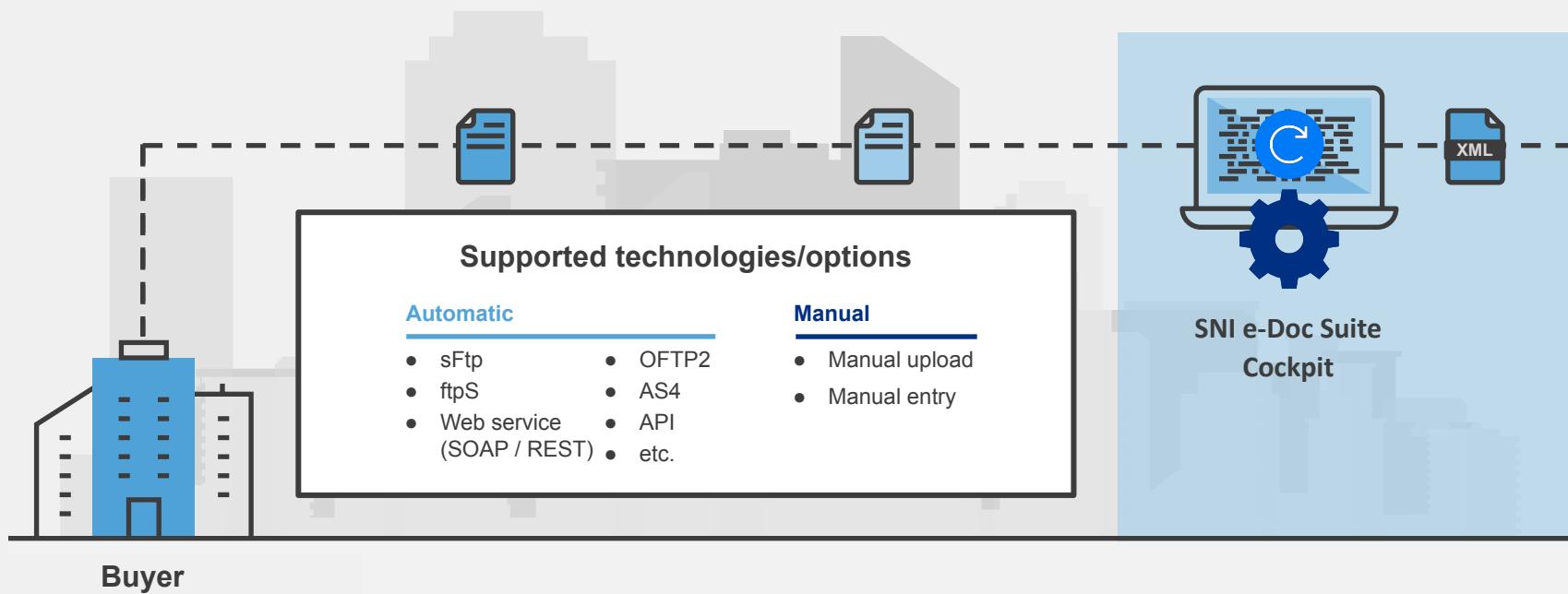


Extract financial data

With external template

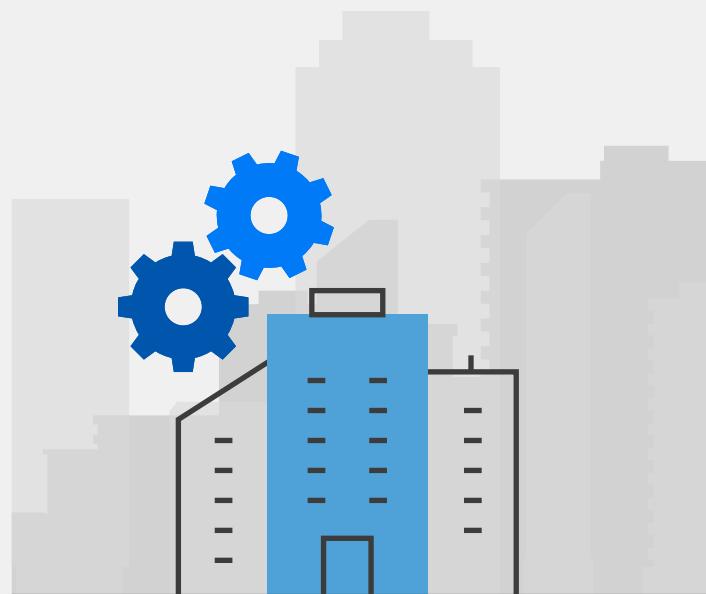
Create required files

Simple user monitoring





Easy integration into your existing systems and infrastructure



Simple

Fast integration without installing SAP OSS notes



Efficient

Cost-effective implementation without employing an external consultant



Accessible

No version upgrade required

*SNI solution support ECC 4.7 and Higher R3 Versions

*SNI SAP solution runs on SAP R3 and S4



Reliable

All SNI solutions are **SAP® Certified**
Powered by SAP NetWeaver®



Cycle of Benefits



Ongoing **support**



Maintenance &
regulatory **updates**



Initial
implementation, training
& **documentation**



Liaising with tax
authorities to keep
you **informed**

SNI provide continuous support for a **long term relationship**

Worldwide Current Solutions



SAF-T & VAT Reporting	e-Invoicing	Invoice Reporting	Other Services	
Austria SAF-T Bulgaria SAF-T France FEC Hungary RFHUAUDIT Lithuania SAF-T Luxembourg FAIA Norway SAF-T Norway VAT Return Poland JPK VDEK Portugal SAF-T Romania SAF-T Turkey e-Ledger Ukraine SAF-T UK Making Tax Digital	AP Automation (SAP Solution) Belgium e-Invoice Croatia e-Invoice Egypt e-Invoicing Egypt e-Receipt Germany ZUGFeRD Germany X-Rechnung Vietnam e-Invoice Indonesia e-Faktur Israel e-Invoice Italy FatturaPA	Malaysia e-Invoice Poland e-Faktur Portugal e-Invoice Romania e-Factura Saudi Arabia e-Invoice Serbia e-Faktura Turkey e-Invoice	Greece myDATA Hungary RTIR Spain SII Turkey e-Archive	Egypt e-Signature Greece e-Delivery Kazakhstan Pharmaceutical Traceability System Poland Whitelist Portugal QR & ATCUD Code Romania e-Transport Turkey PanoSign (Digital Signature Platform) Turkey e-Bank Turkey e-Accounting Receipt Turkey e-Declaration Turkey e-Inventory Turkey e-Note of Expenses Turkey e-Producer Receipt Turkey e-Reconciliation Turkey e-Waybill Turkey VAT Number Validation VIES

Upcoming Roadmap



Greece e-Delivery, Mandatory (Phase B)



Denmark B2B e-Invoice, Mandatory



Belgium B2B e-Invoice, Mandatory



Poland B2B e-Invoice, Mandatory



Latvia B2G e-Invoice, Mandatory



Bulgaria SAF-T, Mandatory



Serbia e-Delivery(B2G), Mandatory



Greece B2B e-Invoice, Mandatory (large Taxpayers)



Croatia Fiscalization 2.0



Nigeria e-Invoice, (Large Taxpayers), Mandatory



Germany B2B e-Invoice, Mandatory



North Macedonia B2B e-Invoice Mandatory



Serbia e-Delivery(B2B), Mandatory



Portugal SAF-T Accounting, Mandatory



Estonia B2B e-Invoice, Mandatory



Spain B2B e-Invoice, Mandatory



Slovakia B2B e-Invoice, Mandatory

Q1-Q2 2026

Q3-Q4 2026

2027

2028



France B2B e-Invoice Mandatory



UAE e-Invoice Pilot



Oman B2B e-Invoicing Pilot



Greece B2B e-Invoice, Mandatory(Other Taxpayers)



Slovenia B2B e-Invoice, Mandatory (TBC)



Latvia B2B e-Invoice, Mandatory(2028)



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Thank you



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