

Frequently Asked Questions for GST InvoiceNow Requirement

Under the GST InvoiceNow Requirement, GST-registered businesses are required to use InvoiceNow-Ready Solutions to transmit invoice data directly to IRAS for tax administration. This is done in phases, starting with mandatory participation by the following group of businesses:

- a) From 1 November 2025, for newly incorporated companies (incorporated within 6 months from the time they submit their application for GST registration) that apply for voluntary GST registration.
- b) **From 1 April 2026**, for all businesses that apply for new voluntary GST registration, regardless of incorporation date or business constitution.

A soft launch commenced from **1 May 2025**. IRAS encourages all new compulsory GST registrants, existing GST-registered businesses and businesses that intend to register for GST to transmit invoice data to IRAS using InvoiceNow-Ready Solutions via the InvoiceNow network.

We have published the <u>e-Tax Guide "Adopting GST InvoiceNow Requirement for GST-registered Businesses"</u> to provide details on the GST InvoiceNow Requirement. This set of Frequently Asked Questions supplements the e-Tax Guide and should be read in conjunction with it.

1

Table of Contents

1.	Phas	ed implementation of the GST InvoiceNow Requirement	5
	1.1	Implementation timeline	5
	1.2	Testing environment	5
	1.3	GST InvoiceNow submission feature	6
	1.4	Businesses that register for GST voluntarily from 1 Apr 2026	6
	1.5	Insufficient supporting documents for compulsory GST registration on/a 1 Apr 2026	
	1.6	Newly incorporated companies that register for GST voluntarily from 1 N 2025	
	1.7	Business redomiciled to Singapore within 6 months from 1 Nov 2025	7
	1.8	Preparing for GST InvoiceNow Ready Requirement	7
	1.9	Use of customised enterprise resource planning (ERP) system with InvoiceNow	8
2.	Scop	e of GST InvoiceNow Requirement	8
	2.1	Transmission of purchase invoice data to IRAS	8
	2.2	Pre-registration GST claims and bad debt relief claims	
	2.3	Recovery of expenses from related entity without any issuance of invoice	es.8
	2.4	GST-registered businesses that are subject to reverse charge	9
	2.5	Request to be exempted from the GST InvoiceNow Requirement	9
	2.6	Purchase invoice data with no input tax claims made	9
3.	Trans	smission of Invoice Data	10
	3.1	InvoiceNow transmission methods	10
	3.2	Conversion of PDF / paper invoices by Access Point Providers	10
	3.3	Transmission of invoice data relating to debit note	10
	3.4	Aggregated invoice data	11
	3.5	Issuance of invoices by overseas shared service centre on behalf of the GST-registered supplier	11
	3.6	Supply of imported goods from overseas principal to section 33(2) agent	11
	3.7	Character limit and maximum file size	11
	3.8	Maximum number of line items per invoice	12
	3.9	Invoice submission list and reconciliation feature	12
	3.10	Issuance of invoice cancellation documents	12
	3.11	Issuance of PDF/paper invoices to customer	12
	3.12	Supplies made using point-of-sale ("POS") systems such as cash registe	
	3.13		
	3.14	Customers are mostly not onboard InvoiceNow	

	3.15	Issuance of invoices to customers on InvoiceNow network	13
	3.16	Invoicing details are entered into customer's platform or portal by supplie	
	3.17	Due date for transmission	
	3.17	Engaging a third party to issue tax invoices on behalf	
	3.19	Develop API to connect to InvoiceNow network	
	3.20	Acknowledgement of successful transmission of invoice data to IRAS	
	3.21	Transmitting invoice data even when customer is not claiming input tax	15
	3.22	transmission	
4.	Mand	datory Data Elements and Validation Checks	15
	4.1	Invoicing customers that are not on InvoiceNow network	15
	4.2	Mapping of internal tax codes	16
	4.3	Peppol invoices meeting tax invoice requirements for GST purposes	16
	4.4	Alignment of GST Category Code with customer	16
	4.5	Collection of mandatory data elements	16
	4.6	Validation Checks for Detecting Wrongful GST Charges	17
5.	Maki	ng resubmissions	17
	5.1	Re-classification of GST category code of purchase invoice	17
	5.2	Invoice data on standard-rated purchase submitted when input tax is not claimed	
	5.3	Issuance of credit note with no GST adjustment	18
	5.4	Requesting supplier to make changes to non-monetary values on the invoice (e.g. delivery address)	18
	5.5	Rejecting supplier's invoice sent via the InvoiceNow network	19
6.	Invoi	cing Guidance for Common Scenarios	19
	6.1	Issuance of credit notes for volume rebates to my customer	19
	6.2	Invoicing customers in foreign currencies	19
	6.3	GST category codes for invoice with different types of supplies	20
	6.4	Self-billing transactions	20
7.	GST	Group Registration	20
	7.1	Submission of GST return and invoice data for entities within GST group.	20
	7.2	GST registration process for GST group registration	20
8.	Pilot	Experience on Invoice Data Submission	21
	8.1	Learning points from the pilot	21
9.	Oblig	gations and Penalties	21
	9.1	Reconciliation of invoice data with figures in the GST return	21
	9.2	Choice to opt out of the GST InvoiceNow Requirement	22
	9.3	Filing of GST returns and keening of husiness records	22

10.	Data Protection and Privacy	23
	10.1 Security of InvoiceNow network	23
	10.2 Retention Period	23
11.	Grants and Support	24
	11.1 Acquiring InvoiceNow-Ready Solutions	24

Questions

Answers

1. Phased implementation of the GST InvoiceNow Requirement

1.1 Implementation timeline

Are the implementation timelines that have been announced (i.e. 1 Nov 2025 and 1 Apr 2026) applicable only to businesses applying for GST registration on a voluntary basis?

When are existing GST-registered businesses and new compulsory GST registrants required to adopt the GST InvoiceNow Requirement?

The implementation timelines of 1 Nov 2025 and 1 Apr 2026 apply to new voluntary GST registrants only.

For existing GST-registered businesses (regardless under voluntary or compulsory GST registration) as well as new compulsory GST registrants, IRAS will publish more information on the implementation timeline when available.

Meanwhile, all GST-registered businesses are encouraged to plan ahead for the GST InvoiceNow Requirement.

You may also onboard the GST InvoiceNow Requirement as an early adopter. For details, please reach out to one of your preferred solution providers:

- -List of Access Point Providers: https://file.go.gov.sg/invoicenowap.pdf
- List of InvoiceNow-Ready Solution Providers accredited by IMDA that offer InvoiceNow-Ready Solutions:

https://file.go.gov.sg/invoicenowirsp.pdf

- List of Free-of-Charge ("FOC") solution packages offered by IRSPs for GST-registered businesses: https://file.go.gov.sg/invoicenow-focpackage-gstbiz.pdf

1.2 **Testing environment**

Is there a testing environment to test my system implementation and ensure that I can transmit invoice data to IRAS successfully before the mandated timelines?

A sandbox environment has been made available since Sep 2024 to enable InvoiceNow Access Point Providers and/or InvoiceNow-Ready Solution Providers and businesses to test their API integration and submission of invoice data to IRAS. Please speak to your IMDA-accredited InvoiceNow Access Point Provider or InvoiceNow-Ready Solution Provider to find out how they can support you in this work.

Questions **Answers** There is no requirement for existing GST-**GST InvoiceNow submission feature** registered businesses to activate the GST I am an existing GST-registered InvoiceNow submission feature from 1 May 2025 business that does not wish to be an unless they are joining the soft launch and want to early adopter. be early adopters of the GST InvoiceNow Requirement. Does that mean that if the GST InvoiceNow submission feature is not Invoice data will not be transmitted to IRAS if the activated, the Peppol invoices that are GST InvoiceNow submission feature is not currently issued to my customers will not activated. be transmitted to IRAS? 1.4 Businesses that register for GST You will need to comply with the GST InvoiceNow voluntarily from 1 Apr 2026 Requirement if you are applying for voluntary GST registration on or after 1 Apr 2026. My business was incorporated on 1 May 2001 and registered for GST from 1 Jan 2002. As my business was dormant, I applied for cancellation of GST registration and my business was deregistered from GST on 1 May 2025. As I have plans to resume business, I intend to apply for voluntary GST registration on 1 May 2026. Do I have to InvoiceNow adopt the GST Requirement? 1.5 Insufficient supporting documents As your application for GST registration submitted for compulsory GST on 15 Apr 2026 was approved on a voluntary registration basis and not on a compulsory basis due to on/after 1 Apr 2026 insufficient evidence to support your \$1 million On 15 Apr 2026, I applied for sales forecast, you are required to comply with the compulsory GST registration as I GST InvoiceNow Requirement. forecast the taxable turnover of my business to exceed \$1 million in the next 12 months. However, as I was unable to provide sufficient documents to support my forecast, my business was registered for GST on a voluntary basis. Do I have to comply with the GST InvoiceNow Requirement?

Questions **Answers** 1.6 Newly incorporated companies that No. Given that the day of application for GST register for GST voluntarily from 1 registration is one day before the mandate takes Nov 2025 effect, the business is not required to come on board the GST InvoiceNow Requirement. If my newly incorporated business For purposes of determining if a business is applies for GST registration on 31 subject to the Requirement and the applicable October 2025 (which is within 6 months phase, new voluntary registrants should refer to of my incorporation date) but only gets their date of application for GST registration the application approved on 2 November instead of the effective date of GST registration. 2025, would it fall under the first phase of the GST InvoiceNow Requirement? 1.7 **Business redomiciled to Singapore** No, you will not be considered as a new company within 6 months from 1 Nov 2025 incorporated within 6 months. In this regard, you are not required to onboard the GST InvoiceNow Requirement when you apply for voluntary GST I am a company that was redomiciled to registration on 1 Nov 2025. Singapore within 6 months from 1 Nov 2025, and I want to apply for voluntary GST registration. Do I need to onboard the GST InvoiceNow Requirement? 1.8 **Preparing for GST InvoiceNow Ready** You may check if your existing solution is included Requirement in the list of IMDA's accredited InvoiceNow-Ready Solutions Providers here. How do I know if my existing solution is If your existing solution is not InvoiceNow-Ready. InvoiceNow-Ready? If my existing you may wish to consider the following options: solution is not InvoiceNow-ready, what can I do to comply with the GST InvoiceNow Requirement? 1. Work with an IMDA-accredited Access Point Provider to get your solution connected to InvoiceNow. Please refer to this link for more information. 2. Consider switching to one of the Free-of-Charge ("FOC") solution packages offered by InvoiceNow-Ready Solution Providers for GSTregistered businesses; or 3. Consider uplifting and switching to an

InvoiceNow-Ready Solution.

Questions **Answers** 1.9 Use of You will need to engage an IMDA-accredited customised enterprise resource planning (ERP) system with Access Point Provider (either directly or via your InvoiceNow appointed systems integrator) to integrate your solution with InvoiceNow. I am using an ERP system. How do I Please refer to this link for more information. enhance or integrate the system to comply with the GST InvoiceNow Requirement? 2. Scope of GST InvoiceNow Requirement 2.1 Transmission of purchase invoice Transmitting purchase invoice data relating to data to IRAS standard-rated purchases and zero-rated purchases to IRAS serves to substantiate your My supplier has transmitted the sales purchases and input tax claims reported in your data through InvoiceNow GST return. This is no different from today where network to IRAS. Since IRAS would businesses are required to report their standardalready have the sales invoice data from rated purchases and zero-rated purchases in the my supplier, why do I need to submit the GST return and submit such data to IRAS when corresponding purchase invoice data to businesses are selected for audit. **IRAS?** Do note that the purchase invoice data submitted may be different from the sales invoice data submitted by the suppliers, as businesses will also need to provide additional information in the purchase invoice data submission process, such as the amount of input tax to be claimed. 2.2 Pre-registration GST claims and bad Invoice data relating to pre-registration GST debt relief claims claims falls outside the scope of the GST InvoiceNow Requirement as such purchases Are the following transactions within the were typically made by businesses before they were registered for GST or had adopted the GST scope of the **GST** InvoiceNow Requirement: InvoiceNow Requirement. Nonetheless. Pre-registration GST claims businesses must maintain proper records and Bad debt relief claims documentary evidence to support their preregistration claims. Bad debt relief claims also fall outside the scope of the GST InvoiceNow Requirement, as no additional invoices are issued or received with respect to these claims. Likewise, the repayment of bad debt relief claims subsequently recovered would also fall outside the scope. 2.3 Recovery of expenses from related The recovery of expenses from your related entity would be regarded as a reimbursement and entity without any issuance invoices constitutes a supply for GST purposes. I had incurred expenses as a principal Hence, even though there is no actual issuance of and recovered the same from my local invoice nor actual payment received, you are

required to transmit invoice data of such recovery

related entity by way of offsetting our

accounts receivables and payables

Questions **Answers** of expenses to IRAS when the transaction is balance. I did not issue any invoice for the recovery of expenses to my related posted into your accounting system. entity. Do I need to transmit the data on the recovery of expenses to IRAS? 2.4 GST-registered businesses that are Only businesses that are liable to register for GST subject to reverse charge solely by virtue of the imported services that they are making and/or importation of Low-Value Goods due to reverse charge rules, are exempted I had procured services from overseas from the GST InvoiceNow Requirement. suppliers. As I am a partially exempt business that is unable to claim input tax This should not be confused with businesses that in full, I am required to apply reverse register for GST under the normal GST charge and account for GST on the registration rules regime but make reverse charge imported services. transactions. Such businesses are still required to comply with the GST InvoiceNow Requirement. Am I exempted from the **GST** InvoiceNow Requirement? 2.5 Request to be exempted from the No, these businesses are required to comply with **GST InvoiceNow Requirement** the GST InvoiceNow Requirement. There is a need to transmit invoice data relating to standardrated purchases and zero-rated purchases to Can the following group of businesses substantiate the taxable purchases and input tax request to be exempted from the GST reported in the business's GST return. InvoiceNow Requirement? For small businesses or businesses with low a) Businesses that wholly make transaction volume, IRAS and IMDA are working supplies to related entities with InvoiceNow-Ready Solution Providers to b) Small businesses, or businesses ensure that there are free or low cost InvoiceNowwith low transaction volume Ready Solutions available in the first few years of c) Businesses that wholly make implementation for businesses to comply with the zero-rated, exempt supplies GST InvoiceNow Requirement. A list of InvoiceNow-Ready Solution Providers offerina Free-of-Charge ("FOC") solution packages for transmitting invoices to IRAS for GST administration purposes is available here. 2.6 Purchase invoice data with no input No, purchases from GST-registered suppliers tax claims made where input tax is not claimed fall outside the scope of the GST InvoiceNow Requirement. If I choose not to claim input tax for a Nevertheless, you may choose to transmit such particular supplier's tax invoice with GST invoice data to IRAS if it eases your compliance. incurred, do I still need to transmit that If you do so, you will have to indicate the GST invoice data to IRAS? Category Code "OP" in the invoice data submitted.

Questions **Answers** 3. Transmission of Invoice Data 3.1 InvoiceNow transmission methods The key difference between the Peppol submission method and the Solution-extracted What is the difference between the submission method lies in how the invoice data is Peppol submission method and the created and transmitted. Solution-extracted submission method for transmitting invoice data to IRAS? In the Peppol submission method, both seller and buyer must be on the InvoiceNow network, before the seller can send the Peppol invoice to the customer through the network. A copy of the Peppol invoice data will be automatically transmitted to IRAS, if the GST InvoiceNow submission feature has been activated. In contrast, the Solution-extracted submission method is used for non-Peppol invoices issued outside (i) the InvoiceNow network for supplies paper/PDF invoices) recorded into the InvoiceNow-Ready Solution: and purchase invoices that are recorded (ii) into the InvoiceNow-Ready Solution. These invoice data are first recorded into the InvoiceNow-Ready Solution and subsequently transmitted to IRAS on a regular basis. 3.2 Access Point Providers are not able to convert Conversion of PDF / paper invoices by Access Point Providers PDF copies of the invoices or paper invoices to Peppol format. Can I send PDF copies of the invoices or paper invoices to my Access Point You will need to record and send the invoice data Providers, so that they can convert them to IRAS via the Solution-extracted submission into the required Peppol format for method. transmission to IRAS? 3.3 Transmission of invoice data relating You should not issue a debit note in place of a tax to debit note invoice when making a standard-rated supply to a GST-registered business. I have issued a debit note to my local related entity to recover expenses and If you have issued a debit note for other this recovery is subject to GST at the transactions, as part of your business practice, prevailing rate. How do I transmit data you can do so and send such data as invoices to relating to the debit note to IRAS? IRAS via the Solution-extracted submission method, using the current invoice document.

InvoiceNow does not support the transmission of

debit note via the network.

Questions **Answers** 3.4 Aggregated invoice data Businesses can choose to aggregate the following transactions on a regular basis before transmitting to IRAS: What types of transactions can (a) Supplies made via point-of-sale systems businesses submit to IRAS on an e.g. cash registers aggregated basis? (b) Supplies where simplified tax invoices or receipts are issued e.g. serially numbered receipts and (c) Petty cash purchases e.g. staff claims and purchases using corporate cards. Please refer to the e-Tax Guide for details on how to perform the submission of such aggregated invoice data. 3.5 Issuance of invoices by overseas The overseas shared service centre may submit shared service centre on behalf of the the sales invoice data to IRAS on your behalf by **GST-registered supplier** using a suitable InvoiceNow-Ready Solution or by connecting their enterprise solution to the InvoiceNow network via an IMDA-accredited I am using an overseas shared service centre to issue invoices to my customers Access Point Provider. in Singapore. Can the overseas shared service centre connect to InvoiceNow When sending the invoice data, the overseas shared service centre needs to ensure that you network to issue and transmit invoices are indicated as the "Supplier" of the invoice data. on my behalf? For example, your UEN should be indicated in the Supplier ID (IBT-030). You may wish to reach out to your InvoiceNow-Ready Solution Provider or Access Point Provider to find out more about how to enable this use case. 3.6 Supply of imported goods from To ease compliance, the Comptroller has waived overseas principal to section 33(2) the requirement for section 33(2) agent to issue agent tax invoices to itself for the supply of goods by the overseas principal to the agent itself. I had imported goods into Singapore as We are prepared to extend this waiver such that a section 33(2) agent on behalf of my the agent is not required to transmit the invoice overseas principal and had supplied the data specifically for such supply and the goods to myself. corresponding purchases. Do I have to transmit invoice data on the For clarity, the agent is still required to issue tax supply of goods by the overseas invoices for goods sold by the agent to its local principal to myself as well as for the customers and transmit the invoice data to IRAS corresponding purchases to IRAS? under the GST InvoiceNow Requirement. Character limit and maximum file size 3.7 There is no character limit set for data element / field for submission to IRAS. However. Is there a specified character limit for businesses should consult their accounting each data element/ field? What is the solution / enterprise system providers, as the

maximum character length that businesses can

maximum file size for the transmission?

Questions		Answers
		key into the data elements/field is typically limited by their solution's / system's user-interface. Please note that the total XML file size must not
3.8	Maximum number of line items per invoice What is the maximum number of line items that can be included in a single invoice?	exceed 10MB per submission. There is no limit on the number of line items per invoice. However, we recommend keeping it to no more than 999-line items per invoice. Please note that the total XML file size must not exceed 10MB per submission.
3.9	Invoice submission list and reconciliation feature Does my InvoiceNow-Ready Solution have a function to extract a list of invoices that have been submitted to IRAS? Will there be any reconciliation feature available in the Solution to validate the invoices sent against those acknowledged by IRAS?	All InvoiceNow-Ready Solution Providers (IRSP) should provide a functionality to track the transmission details of invoice data to IRAS. Users should be able to retrieve the following information from their IRSP (e.g. date and time of invoice data submission, status of the submission of the invoice data to IRAS, including IRAS Acknowledgement ID). Please note that the presentation of information to users may differ across solution providers. Please approach your IRSP or Access Point Provider for more details.
3.10	Issuance of invoice cancellation documents My existing business processes utilise invoice cancellation documents instead of credit notes. Is this permitted under the GST InvoiceNow Requirement?	The GST InvoiceNow Requirement supports two document types: Invoice and Credit Note. If your existing invoice cancellation document captures the details required for a credit note, you would be able to submit such data to us in the form of a Credit Note.
3.11	Issuance of PDF/paper invoices to customer If my customer is also on InvoiceNow, can I still issue PDF/paper invoices to this customer?	It is ultimately a business decision whether to issue PDF/paper invoices to customers as duplicate copies after issuing Peppol invoices to these customers. In such cases, the business should indicate on the PDF/paper invoices that the documents are duplicate copies, and the customer should ensure

Questions	Answers
3.12 Supplies made using point-of-sale ("POS") systems such as cash registers I operate a restaurant and issue receipts using my POS system. Do I need to issue Peppol invoices to my customers? How should I transmit my invoice data to IRAS? 3.13 Separate invoicing and accounting systems I am a company that uses different systems for invoicing and accounting. Our company's transactions are currently recorded in our accounting system via journal entry while our invoices are issued using a separate InvoiceNow-Ready system. The invoice numbers in the invoicing system are different from the internal reference number in the accounting system.Can I continue with the above practice?	that no duplicate input tax claims are made in their GST returns. For sales made via POS, you may continue to issue receipts to your customers without issuing Peppol invoices. However, you must submit the sales invoice data to IRAS in compliance with the GST InvoiceNow Requirement. You can choose to record these transactions in an aggregated manner. The aggregated invoice data will be sent to IRAS in the form of solution-extracted invoices. You may wish to reach out to your InvoiceNow-Ready Solution Provider to find out more about how your existing POS system can be integrated with an InvoiceNow-Ready Solution to submit invoice data to IRAS. You may submit invoice data to IRAS at the point of issuance by using a InvoiceNow-Ready Solution. In this way, you may continue to maintain different systems for invoicing and accounting. However, for the purposes of the GST InvoiceNow Requirement, the invoice number transmitted to IRAS must reflect what is issued to your customer, and not the different internal reference number assigned in your accounting systems. You may wish to reach out to a InvoiceNow-Ready Solution Provider for more details.
3.14 Customers are mostly not onboard InvoiceNow I only have a handful of customers who are onboard InvoiceNow. For the rest of my sales invoices issued to other customers, how do I submit them to IRAS?	For sales invoices issued outside the InvoiceNow network, you will have to submit them as invoice data to IRAS as solution-extracted invoices (i.e. Type 2 Submission). If you are using an InvoiceNow-Ready Solution to record your sales invoices, the solution-extracted invoice data is automatically extracted and transmitted to IRAS on a periodic basis.
3.15 Issuance of invoices to customers on InvoiceNow network	You can make use of the <u>SG Peppol Directory</u> to search for the Peppol ID of businesses on the

Questions Answers Peppol Network that are registered with IMDA, Singapore's Peppol Authority. You can then use My customer informed me that he is the Peppol ID to issue invoices to businesses that connected to InvoiceNow network. How are on the InvoiceNow network. do I obtain the Peppol ID of my customer to send him the invoice? 3.16 Invoicing details are entered into Your company may continue to use its current CES and generate tax invoices on your suppliers' customer's platform or portal by behalf. supplier If your company is under the GST InvoiceNow My company currently falls under CES Requirement, your company will need to submit (Customer's Electronic System), where the purchase data to IRAS using the Solutionsuppliers will log into our portal to extracted Submission method. Likewise, for your provide their tax information and our suppliers, if they are under the GST InvoiceNow system will generate a tax invoice on Requirement, they will need to submit their sales their behalf. data to IRAS using the Solution-extracted Submission method. How should my company and suppliers transmit the invoice data to IRAS? 3.17 Due date for transmission For Peppol invoices issued under Type 1A Submission, the invoice data will generally be transmitted to IRAS on a real-time or near real-When is the invoice data transmitted to time basis as and when the invoice data is IRAS? Can businesses choose to successfully transmitted to the customer via the transmit the invoice data only after the InvoiceNow network. GST return is finalised? For solution-extracted invoices issued and received under Types 1B, 2 and 3 Submissions, businesses may schedule submissions on a regular basis via their solution. Businesses will need to ensure that all invoice data must be transmitted to IRAS by the earlier of: (a) The date in which the relevant GST return is filed, or (b) The filing due date of the relevant GST return. 3.18 Engaging a third party to issue tax If the third-party service provider is using its own invoices on behalf solution, it should engage an Access Point Provider to integrate the solution to the network. You can find the list of Access Point Providers I engage a third-party service provider here. (e.g. accounting firm, tax agent, billing intermediary) to issue tax invoices on If it is using an InvoiceNow-Ready Solution, it can my behalf. How can the third-party make use of the solution to perform transactions service provider help me comply with on behalf of its clients, with its clients' consent.

the GST InvoiceNow Requirement?

Questions **Answers** Develop API To have access to the InvoiceNow Network and 3.19 to to connect InvoiceNow network use your own API connection, providers must first become an IMDA-accredited Access Point and be bound to IMDA's Peppol Authority Specific Can we develop our own API to connect Requirements and regulations. Alternatively, you to the InvoiceNow network, or have our can connect your in-house solution through one of in-house developed API certified by the IMDA-accredited Access Point Providers IMDA? listed here. 3.20 Acknowledgement of successful For every successful transmission, you will transmission of invoice data to IRAS receive an acknowledgement ID from IRAS through your InvoiceNow-Ready Solution when the invoice data is successfully transmitted to How do I know if I have successfully IRAS. This acknowledgement ID confirms that submitted the invoice data to IRAS? vour submission has been received. Please speak to your InvoiceNow-Ready Solution Provider for more details on how to view or retrieve the acknowledgement IDs of your submitted transactions. 3.21 Transmitting invoice data even when You are required to transmit invoice data to IRAS customer is not claiming input tax that falls within the scope of GST InvoiceNow Requirement, regardless of your customer's GST registration status or whether they claim input tax. Do I need to transmit invoice data to IRAS if my customer is: a) GST-registered but chooses not to claim the input tax; or b) Non-GST registered. documents 3.22 Attaching supporting Businesses are not required to submit supporting (e.a. shipping documents) documents in the transmission of invoice data to transmission IRAS. However, businesses must maintain the supporting documents as part of their records, to support their GST declarations. Businesses are Are businesses able to attach required to provide the supporting documents supporting documents (e.g. proof of upon request by IRAS. signature, bill of lading, airway bill etc) when transmitting invoice data? As for whether and how businesses are able to attach supporting documents when invoice transmitting data their tο suppliers/customers on the InvoiceNow network, please reach out to your InvoiceNow-Ready Solution Provider or Access Point Provider for details. 4. **Mandatory Data Elements and Validation Checks** 4.1 Invoicing customers that are not on Yes, you are required to collect customer's details InvoiceNow network such as Customer Name, Customer UEN and Customer Address as these are mandatory data elements of invoice data for submission to IRAS. For invoices issued to customers not on

the InvoiceNow network, am I required

Questions **Answers** to collect details such as Customer Nonetheless, if your customers are non-GST Name, Customer UEN and Customer registered individuals, you can indicate "NA" in Address from my customers (including both the Customer Name and Customer UEN overseas customers) for submission to fields. IRAS? Do I have to validate the customer's details? For overseas customers, you must indicate their overseas business registration / identification numbers as the Customer UEN. There is no need for you to validate the customer details as you will be relying on the information provided by the customer to make the invoice data submission to IRAS. However, you must maintain supporting documents to substantiate the customer information as part of your record keeping. 4.2 Mapping of internal tax codes You can continue to use your internal tax codes. However, you will need to map your internal tax codes to IRAS' list of prescribed GST category I currently use my own internal tax codes codes in order to submit the invoice data to in my accounting software to tag my purchases and supplies. Do I need to IRAS. Alternatively, you can also adopt IRAS' list replace them with IRAS' of prescribed GST category codes to tag your list of prescribed GST category codes? transactions moving forward. You may wish to speak to your IMDA-accredited Access Point Provider or InvoiceNow-Ready Solution Provider to find out how they can support you in this work. 4.3 Although the Peppol invoices issued by your Peppol invoices meeting tax invoice requirements for GST purposes supplier through the InvoiceNow network do not contain the words "Tax Invoice", IRAS is prepared to accept the Peppol invoices as valid tax invoices My supplier has issued Peppol invoices which you may use to support your input tax to me through the InvoiceNow network. claims. However, I note that the Peppol invoices This is on the condition that all the other contents do not contain the words "Tax Invoice". required on a tax invoice, as specified under Can I still rely on the Peppol invoices to Regulation 11 of the GST (General) Regulations support my input tax claim? are present. You must also ensure that you satisfy all other normal input tax claiming conditions. 4.4 Alignment of GST Category Code No. it is possible for the GST Category Codes of with customer both parties to be different. For instance, the supplier may charge output tax and indicate "SR". If both the supplier and the customer are while the customer may fail to meet the conditions on InvoiceNow, does IRAS expect the for claiming input tax (e.g. not for business GST Category Codes of both parties to purposes) and therefore indicate "OP" to not claim be aligned when submitted? the input tax, as opposed to "TX" to make the input tax claim. 4.5 Collection of mandatory data Mandatory Data Elements ("MDEs") that are elements required in the invoice data transmitted to IRAS

are broadly in line with the existing GST

Questions

What is the purpose of IRAS requiring so many data elements for transmission? What happens if some of these mandatory fields are not available?

Answers

requirements of a tax invoice as set out in the GST Act.

If any of these MDEs are not provided or populated in the invoice data to be transmitted to IRAS, the data will automatically be rejected.

4.6 Validation Checks for Detecting Wrongful GST Charges

How do the validation checks for detecting wrongful GST charges help:

- Supplier to ensure GST was charged correctly; and
- Customer that GST was not wrongly incurred.

If the validation checks feature has been built into the supplier's solution, the feature will trigger an alert to notify the supplier if the supplier's GSTN is invalid/ not found (checked against IRAS' GST-registered business registry) at the point of invoice issuance under Type 1A submission, and to amend the supplier GSTN or to remove the GST charges before proceeding to issue the invoice.

Under the Type 2 submission, where the supplier's sales invoice is recorded into the solution, the feature will trigger an alert at the point of invoice data submission to IRAS if the supplier GSTN is invalid/ not found. (i.e. Invoice data will still be submitted to IRAS)

On the other hand, if the validation checks feature has been built into the customer's solution, the customer will receive an alert at the point of invoice data submission as purchase invoice data to IRAS under Type 1B and Type 3 submissions-similar to the use case for Type 2 submissions. The customer should inform the supplier of the wrongful GST charges and should not claim input tax on the purchase.

For more information, please refer to the guide on Recommended Features for the GST InvoiceNow Requirement: Validation Check on Wrongful GST Charges for more details. You may reach out to your InvoiceNow-Ready Solution Providers/ Access Point Providers or in-house enterprise solution providers on the development of the validation checks.

5. Making resubmissions

5.1 Re-classification of GST category code of purchase invoice

I initially submitted a purchase invoice as a standard-rated purchase at the point of processing. However, during GST return preparation, my company decided not to claim the input tax in the GST return and If you have made an adjustment e.g. reclassify the GST category code of an invoice recorded in your InvoiceNow-Ready Solution, you are required to resubmit the invoice data to IRAS. When you perform the resubmission, IRAS will regard the last invoice submitted to be the latest submission for tax administration purposes.

Questions		Answers
	re-classified the GST category code from TX (taxable) to OP (out-of-scope) in my InvoiceNow-Ready Solution. Do I need to perform a resubmission to IRAS in view of the re-classification?	
5.2	Invoice data on standard-rated purchase submitted when input tax is not claimed I submitted an invoice data on standard-rated purchase with the GST category code TX to IRAS at the point of processing the invoice. Subsequently, I did not include the input tax in the GST return, as it did not satisfy the input tax claiming conditions. Do I need to resubmit the invoice data to IRAS?	As you did not make any adjustment to the invoice data recorded in the InvoiceNow-Ready Solution, you are not required to make resubmission, even if you did not claim the input tax in the GST return.
5.3	Issuance of credit note with no GST adjustment I have issued a credit note to my customer and we have agreed not to adjust the GST amount charged on the original tax invoice. Do I still need to submit the credit note data to IRAS?	Notwithstanding that there is no adjustment in the GST amount charged on the original tax invoice, you are still required to submit the credit note data to IRAS. You must use the same GST category code applicable to the original tax invoice (i.e., "SR") when you submit the credit note data.
5.4	Requesting supplier to make changes to non-monetary values on the invoice (e.g. delivery address) My supplier has issued an invoice to me via the InvoiceNow network. However, the goods delivery address on the invoice is incorrect. I have requested the supplier to amend and send a revised invoice to me. Do I have to send both original invoice and revised invoice to IRAS under Type 1B submission?	To the extent that there is no change to the monetary value, your supplier can still opt to amend the goods delivery address on the invoice. Your supplier is required to send the revised invoice using the same Document UUID of the original invoice to you via the InvoiceNow network. If you have not processed and submitted the original invoice to IRAS under Type 1B submission, you can simply submit the revised invoice as purchase invoice data to IRAS under Type 1B submission. Otherwise, if you had submitted the original invoice to IRAS, you just need to submit the revised invoice as purchase invoice data to IRAS under Type 1B submission. IRAS will regard the last invoice or credit note submitted to be the

Questions Answers latest submission and use that record for tax administration purpose. 5.5 Rejecting supplier's invoice sent via As the supplier has successfully sent you the the InvoiceNow network invoice via the InvoiceNow network (i.e., Type 1A Submission), a copy of the invoice data has been transmitted to IRAS. This occurs regardless of My supplier has sent me an invoice via whether you subsequently accept or reject the the InvoiceNow network. Due to genuine invoice. commercial reasons, I would like to reject the invoice. What should my If there are issues with the invoice, the supplier supplier and I do to rectify this mav either transaction? Issue a credit note via the InvoiceNow network; or Perform a resubmission if the changes do not affect the monetary value, by sending the revised invoice to IRAS using the Document UUID of the original invoice. As you will be rejecting the original invoice, you will not submit any purchase invoice data in relation to the rejected invoice to IRAS. You will submit the revised purchase invoice data based on either the credit note issued by the supplier or the revised purchase invoice, provided that you are only claiming the input tax on the revised purchase invoice. **Invoicing Guidance for Common Scenarios** 6. 6.1 Issuance of credit notes for volume You should state the numbers and dates of the rebates to my customer original tax invoices in the Preceding Invoice Number (IBT-025) and Preceding Invoice Date I have issued a credit note for a volume (IBT-026) fields. rebate to my customer for making purchases exceeding a certain amount. However, if you are unable to identify the original When I submit the credit note data to tax invoices (e.g. the volume rebates cannot be IRAS, do I have to indicate all the identified with a particular tax invoice), you may leave the fields blank. You must maintain other numbers and dates of the original tax documentary evidence that you have accounted invoices? for GST on the original supplies. 6.2 Invoicing customers in foreign You are required to convert all invoice data that currencies are required for GST reporting in foreign currencies to their Singapore dollars equivalents, for submission to IRAS. You are not required to I have issued a commercial invoice in provide the exchange rate in the invoice, but you foreign currency for a zero-rated supply. must use approved exchange rates specified in Do I have to convert the value of the

the e-Tax Guide "Exchange Rates for GST

purposes" to convert the foreign currency to SGD.

data to IRAS?

zero-rated supply into Singapore dollars

equivalent when I submit the invoice

Que	stions	Answers	
		Please refer to the e-Tax Guide for details on how to fill in the mandatory data elements for invoices issued in foreign currencies.	
6.3	GST category codes for invoice with different types of supplies I am issuing an invoice that includes both standard-rated and zero-rated supplies to my customer via the InvoiceNow network. Can I use multiple GST category codes for this single invoice data submission to IRAS?	Yes, a single invoice can have multiple line items, each with its own GST category code. This means one invoice can contain several different GST category codes. Please refer to the e-Tax Guide for an example of an invoice with multiple GST category codes.	
6.4	Self-billing transactions I am under a self-billing arrangement with my customer. Do I need to transmit invoice data on self-billing transactions via InvoiceNow to IRAS?	Invoices for self-billing transactions are to be transmitted to IRAS by way of the Solution-extracted submission method (as they can only be issued outside the InvoiceNow network). The customer-cum-issuer of the self-billing invoice must submit the invoice data to IRAS under Type 2 Submission, whereas the supplier-cum-recipient must submit the invoice data under Type 3 Submission. Please refer to the e-Tax Guide for the details to fill in the mandatory data elements for self-billing scenario.	
7.	GST Group Registration		
7.1	Submission of GST return and invoice data for entities within GST group Are entities under GST group registration still required to report their GST return on a consolidated basis,	Yes, entities under GST group registration will continue to report their GST return on a consolidated basis. When sending invoice data to IRAS, such entities can either transmit invoice data to IRAS as separate entities or on a consolidated basis (by	
	even though invoice data is transmitted to IRAS at the individual entity level?	the representative of the GST group).	
7.2	GST registration process for GST group registration With the introduction of the GST InvoiceNow Requirement, are there any changes to the GST registration application process for GST group registration under the following scenarios:	There are no changes to the GST registration application process for GST group registration. The new voluntary GST registrant or overseas entity may apply to be included into an existing GST group. If a new voluntary GST-registered entity is included into an existing GST group, the entity will be subjected to the GST InvoiceNow Requirement based on the phase for the GST group.	

Questions **Answers** Addition of new voluntary GST If any of the entities in the GST group are registrants into an existing GST Excluded Businesses (e.g. overseas entity), only group the Excluded Businesses need not transmit their ii) Addition of overseas entity into invoice data to IRAS. an existing GST group 8. Pilot Experience on Invoice Data Submission 8.1 Through the pilot, IRAS identified the following Learning points from the pilot areas for improvement in the invoice data What are the key findings and lessons submitted: learned from the pilot? 1. Poor data quality due to absence of validation checks in the submission process 2. No single standard in the GST category tax codes used 3. Duplicate submission of invoice data to correct invoice data originally submitted 4. Incomplete transmission of invoice data due to limitations in system design of certain InvoiceNow-Ready Solutions IRAS had provided more details on the recommended validation checks. list acceptable GST category codes, and the handling of resubmission of invoice data in the e-Tax Guide. Businesses should also work closely with Access and/or InvoiceNow-Ready Point Providers Solution Providers to build the recommended validation checks into submission process and ensure that their InvoiceNow-Ready Solutions are configured with the correct GST category codes for submission of invoice data. 9. **Obligations and Penalties** 9.1 Reconciliation of invoice data with Businesses should perform due diligence to figures in the GST return ensure that the invoice data submitted tally with what they submit in their GST returns. Do I need to reconcile the invoice data However, IRAS recognises that legitimate with the figures submitted in the GST differences could arise due to reasons such as: return? Will I be penalised for (a) Timing differences - e.g. where time of discrepancies between invoice data and supplied is triggered by payment, and invoices GST return declarations? are issued after the filing of GST return;

supplies straddling GST registration, etc.
(b) Supplies where invoices are not required – e.g. deemed supplies and Reverse Charge

Questions **Answers** (c) Purchases where input tax are not claimed or not claimed in full, e.g. input tax subject to attribution or apportionment (d) Correcting errors in F5 instead of filing F7 Businesses will not be penalised so long as they adhere to the record keeping requirements and are able to produce these records upon request to substantiate their GST reporting and invoice data submissions 9.2 Choice to opt out of the GST All GST-registered businesses will be required to transmit invoice data to IRAS using InvoiceNow-InvoiceNow Requirement Ready Solutions via the InvoiceNow network, Can I opt out of the GST InvoiceNow except for Excluded Businesses (i.e. overseas Requirement? Will there be penalties for entities and entities that are registered wholly due non-compliance (e.g., non-submission, to the Reverse Charge Regime). This requirement submission of invoice data. will be implemented progressively, starting with late newly incorporated companies that apply for GST errors/mistakes on the invoice)? registration on a voluntary basis from 1 Nov 2025, and any business that applies for voluntary GST registration from 1 Apr 2026. Your GST application may not be approved, or your GST registration status may be revoked if you do not comply with the GST InvoiceNow Requirement. IRAS recognises that businesses require time to adapt to the GST InvoiceNow Requirement and will be calibrated in our enforcement approach during the initial phases of onboarding, especially for genuine mistakes or errors in invoice data that are not due to negligence or made without reasonable excuse. 9.3 Filing of GST returns and keeping of The GST InvoiceNow Requirement does not business records preclude businesses from their existing GST responsibilities. GST-registered businesses must Do businesses still need to file GST continue to file their GST returns and keep proper returns and keep records if they submit business and accounting records, including invoice data to IRAS? Would IRAS source documents, for at least 5 years to support require businesses to provide the their GST declarations. underlying invoices during an audit? Where businesses maintain electronic records instead of physical records, they must ensure that electronic records of all tax invoices, both issued and received, are stored in their information systems in a manner that enables IRAS to verify the figures stated in GST returns. This includes the storage of structured invoice data in machine-

readable formats such as XML, particularly

Ques	stions	Answers
		Peppol invoices in the form of XML files that contains the Mandatory Data Elements.
		During IRAS audits, businesses may be required to provide the underlying invoices for supply and purchase transactions made outside the InvoiceNow network, which serve as source documents, for verification purposes.
10.	Data Protection and Privacy	
10.1	Security of InvoiceNow network	The InvoiceNow network is implemented with security measures in place.
	Is the InvoiceNow network secure?	Firstly, only IMDA-accredited Access Point Providers are allowed to operate on the network and are authorised with a PKI certificate issued by Open Peppol who is the governing authority.
		Secondly, the transmitted data is protected with SSL transport layer security such that the data is sent through the secured and encrypted channel in the InvoiceNow network.
		Thirdly, the transmitted data is signed using the Access Point Providers' authorised PKI certificate to ensure that the data is genuine and non-repudiable.
		Lastly, any receiving Access Point Providers will check the signature of sending Access Point Providers to ensure that they are authorised on the network before they accept the data.
10.2	Retention Period What are the data protection measures that have been put in place to safeguard the invoice data that is received by IRAS, including the retention period of the data?	The IRAS system that receives invoice data, employs a multi-layered approach to ensure the security of our API integration. This includes robust authentication and authorisation mechanisms to verify the identity of Access Point Providers (APs) accessing the Invoice Data Submission API through the APEX portal.
		Data transmitted through the API is encrypted to protect it from cybersecurity threats such as unauthorised access or data breaches. Rolebased access control also governs access to specific API functionalities and data.
		Additionally, regular security audits and testing are conducted to identify and address potential vulnerabilities, and compliance with industry standards and regulations is maintained. Continuous monitoring processes are in place to

Ques	stions		Answers
			detect and respond to security incidents in real time, to monitor and log all data access activities, ensuring the integrity and confidentiality of the API integration and data transmitted.
			Similar to the tax information collected by IRAS, IRAS is bound by secrecy laws and may disclose such information to third parties only for reasons permitted by law. IRAS is committed to safeguarding the confidentiality and security of our taxpayers' data and upholding high standards of accountability.
			Please refer to our <u>Data Protection Statement</u> and <u>Privacy Statement</u> for more information on how we handle the data that you have entrusted to us safely.
11.	Grants and Supp	ort	
11.1	Acquiring Solutions	InvoiceNow-Ready	IRAS and IMDA are committed to help businesses navigate the regulatory requirements and embrace digital solutions.
	Are there any grants or support available for businesses to acquire InvoiceNow-Ready Solutions?		Businesses using IMDA-accredited InvoiceNow-Ready Solution Providers may also be eligible to apply for the Productivity Solutions Grant (PSG) and receive up to \$30,000 for IT solutions and equipment, including InvoiceNow-Ready Solutions.
			IRAS and IMDA are also working closely with InvoiceNow-Ready Solution Providers ("IRSP") to provide Free-of-Charge ("FOC") solution packages for businesses to adopt. These FOC solution packages aim to reduce businesses' costs associated with complying to the GST InvoiceNow Requirement and the expenses related to integrating their existing system infrastructure with InvoiceNow.
			A list of IRSPs offering FOC solution packages for transmitting invoices to IRAS for GST administration purposes will be made available by May 2025.

12. Updates and Amendments

Date of amendmen	Amendments made
1 16 Oct 2025	 Added questions 1.6 to 1.9, 2.6, 3.10 to 3.22, 4.4 to 4.6, 5.4 to 5.5 Amended questions 1.1, 3.9, 9.3
1 16 Oct 2025	•