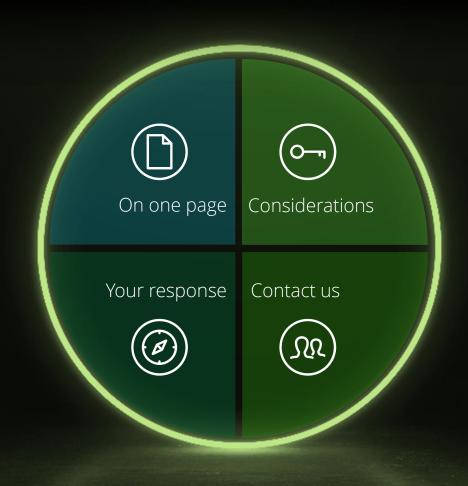
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CESOP
Central Electronic System
of Payment information
A VAT transactional reporting
obligation for PSPs in the EU



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CESOP on one page

From 2024 all EU PSPs will be required to record and report transactional data of cross-border payments





Why?

Closing the VAT gap



When?

1 January 2024



What data?

- 1. BIC/ID reporting PSP
- 2. Payee name
- 3. Payee VAT ID/TIN*
- 4. Payee account ID
- 5. Payee PSP BIC/ID
- 6. Payee Address*
- 7. Refund Y/N, link
- 8. Date/time
- 9. Amount
- 10. Currency
- 11. MS of payment origin
- 12. MS of refund destination
- Payer location information (payment origin)
- 14. Transaction ID
- 15. Physical presence Y/N, ref



What is it?

Change to the EU VAT directive Administrative obligation Report transactional data each quarter and keep records



Who?

Payment Service Providers (PSPs) under PSD2

Including exempt small payment institutions (SPIs)



Which transactions?

Cross border payments

By <u>payee</u> PSP if payer is in EU

By <u>payer</u> PSP if payee is non-EU

If n>25 per payee in a quarter



How?

Quarterly reporting to local tax authority ("MS TA", BIC/IBAN leading)



Standardized XML format (<u>schema</u>)

CESOP: key considerations

When implementing CESOP, companies must navigate between multiple stakeholders and their interests





Relations with supervisors

- 1. **Tax Authorities:** implementing CESOP is a matter of tax compliance
- 2. **Financial supervisors:** CESOP is primarily an instrument to combat financial fraud and money laundering. Not complying with CESOP or having information about fraudulent transactions on your network will attract supervisors' scrutiny
- 3. **Data protection authorities:** oversharing data can qualify as unlawful personal data processing



Multi-country reporting

In which countries are CESOP reports due?

How do you ensure all reportable transactions are reported?

How do you ensure transactions are reported only once?



Impact on systems

Are all necessary systems and data sources fit for CESOP reporting?

How can systems continuity *and* timely reporting be guaranteed?

What kind of governance will be in place and how does this fit within the business control framework?



Data validation and quality assurance

Tax authorities will have the responsibility to perform a data acceptance check.

How can you monitor data quality and prevent validation errors or questions?

CESOP: where we can help

Companies need to start assessing the extent of the impact and form a proportionate, effective and timely response



Impact assessment

Assess impact of rules to day-to-day operations

Identify resources required to manage the requirements

Identify potentially affected services and products

Build roadmap with steps for implementation/governance

Technology and implementation

Deployment of technology for automation and reporting

Performance optimisation

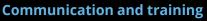


Policies and procedures

Update policies and procedures

Update legal arrangements

Implement hierarchy for reporting



Internal communication plan

Awareness training and process specific training

External communication plan

Governance

Integrate with existing governance framework

Manage interaction with regulators

Implement and monitor control

Continuous data monitoring



Knowledge management

Monitoring of local regulations and guidance Identification of deviations from EU standard

CESOP: contact us

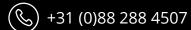
For more on CESOP and to discuss specifics, reach out to your Deloitte advisor, or any of the persons below.





Michel Schrauwen

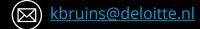


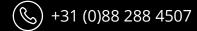






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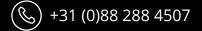






Oscar Smeets







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