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### Audit data collection — Customs and indirect taxes extension

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Co	ntent	SS CONTRACTOR OF THE PROPERTY	Page
For	eword		iv
Intr	oductio	on	<b>v</b>
1	Scor	ne	1
_	•	native references	
2			
3	Terr	ns and definitions	2
4	Mod	ules, tables and fields	3
	4.1	General	
	4.2	Naming conventions	
	4.3	Representation and datatype of data elements	5
	4.4	Characteristics tables	
	4.5	Base module	6
		4.5.1 General	
		4.5.2 BAS_Selection_Period	
	4.6	General ledger module	
		4.6.1 General	
		4.6.2 GL_Details_Characteristics	
	4.7	Sales module	
		4.7.1 General	
	4.0	4.7.2 SAL_Invoices_Details_CHAR	
	4.8	Purchase module 4.8.1 General	
		4.8.2 PUR_Invoices_Details_CHAR	
	4.9	Inventory module	
	4.7	4.9.1 General	
		4.9.2 INV Product CHAR	
		4.9.3 INV_Transaction_CHAR	
		4.9.4 INV_Transaction_Associated_DOC	
Ann	<b>iex A</b> (ir	formative) Guidelines on how to use the extension for customs audits	22
		formative) Guidelines on how to use the extension for indirect tax audits	
Bib	liograp	ny	35

#### **Foreword**

ISO (the International Organization for Standardization) is a worldwide federation of national standards bodies (ISO member bodies). The work of preparing International Standards is normally carried out through ISO technical committees. Each member body interested in a subject for which a technical committee has been established has the right to be represented on that committee. International organizations, governmental and non-governmental, in liaison with ISO, also take part in the work. ISO collaborates closely with the International Electrotechnical Commission (IEC) on all matters of electrotechnical standardization.

The procedures used to develop this document and those intended for its further maintenance are described in the ISO/IEC Directives, Part 1. In particular, the different approval criteria needed for the different types of ISO documents should be noted. This document was drafted in accordance with the editorial rules of the ISO/IEC Directives, Part 2 (see <a href="www.iso.org/directives">www.iso.org/directives</a>).

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For an explanation of the voluntary nature of standards, the meaning of ISO specific terms and expressions related to conformity assessment, as well as information about ISO's adherence to the World Trade Organization (WTO) principles in the Technical Barriers to Trade (TBT) see <a href="https://www.iso.org/iso/foreword.html">www.iso.org/iso/foreword.html</a>.

This document was prepared by Technical Committee ISO/TC 295, Audit data services.

Any feedback or questions on this document should be directed to the user's national standards body. A complete listing of these bodies can be found at <a href="https://www.iso.org/members.html">www.iso.org/members.html</a>.

#### Introduction

ISO 21378: 2019 Audit data collection standard establishes common definitions of accounting data elements and provides the information necessary to extract relevant audit data. The standard primarily focuses on the access of audit data. It helps bridge the gap between the various participants in the audit process, consisting of auditors, auditees, software developers and IT professionals by creating a mechanism to express information common to accounting in a way which is independent of accounting and ERP systems. The standard serves as a basis for data extraction in the areas of general ledger, accounts receivable, sales, accounts payable, purchasing, inventory (including both inventory and movement data), and property, plant, and equipment. ISO 21378 focuses on financial audits (financial statements).

This document concerns tax and customs audits relating to the accuracy and completeness of reported indirect taxes and customs duties conducted by or on behalf of governments. A tax or customs audit is the process where the auditor seeks to obtain audit information in an expert, structured, systematic, independent, and documented manner with the aim of answering the question of whether the subject to the audit meets defined criteria.

Indirect taxes and/or customs duties audits, require the same data set, or subsets thereof, as financial audits. Therefore, it makes sense to use the ISO 21378 for these types of audits. However, due to specific characteristics of VAT and/or customs duties, additional data, not yet covered by the standard, are needed to achieve audit goals.

This document aims to address two challenges, namely the wide variety of laws and regulations prevailing globally, and the variety of methods used by ERP systems with respect to data attributes. At the same time, this document offers a relative limited extension to ISO 21378, and can be implemented without changing it.

This document introduces a mechanism to add characteristics to the current standard. Needs of data can obviously vary by audit type, country, and other factors. The mechanism enable to unlock the ERP-data requested by the auditor in that the data dump for indirect tax audits can differ of that for customs duties audits or financial audits.

First of all, the mechanism is designed as a vehicle for data exchange. However, the working group recommends using global or widely accepted values for defined characteristics where applicable. For example, other ISO standards or the World Customs Organization (WCO) standards may be practicable.

If these are lacking or not applicable, then values from a less comprehensive or hierarchical lower level may be used. For example, those which are practice in a specific region or country (e.g., European Union, China). If there is no shared understanding of certain values, then the auditee should explain to the auditor the actual meaning in case the semantics are missing.

With this document, auditors should have an additional means to ISO 21378 of assessing whether the audited company has paid the right tax and customs duties, at the right time, in accordance with national tax legislation.

### Audit data collection — Customs and indirect taxes extension

#### 1 Scope

This document addresses the functional requirements that build on the ISO 21378 for audits in the areas of custom duties and indirect taxes (e.g., VAT and excise duties). It addresses how tax auditors obtain audit data for these audits, including data element formats and to some extent content requirements.

From a customs and indirect tax perspective, this document aims to support data exchange of relevant characteristics on taxable transactions and related import duties, excise duties, VAT and similar consumption taxes.

In practice, this document applies to virtually every step in the whole process in the supply chain and covers both goods and services. It includes domestic transactions, cross-border transactions and can cover both third party and intercompany transactions or even movements of goods within the same company. This document doesn't describe when an event is taxable nor how to calculate tax or customs duties as this is legislation specific and the situation can vary from country to country.

Custom duties are involved in the implementation and enforcement of legislation on import and export of goods, storing and processing of bonded or excise goods and levying duties within the supply chain, like cross-border import duties or (domestic) sales. Value-added tax (VAT) and its equivalent in several jurisdictions (goods and services tax, or GST), is a tax collected at all stages of the process of production and distribution of goods and services, accumulation of the tax being prevented by allowing businesses to deduct the tax they incur from the tax they collect.

This document covers standard exchange of the data related to taxable operations / activities by businesses to perform controls and audits more effectively and efficiently through automated tests. This document focuses on the characteristics related to taxability and the related formalities of the indirect tax and customs duties regulations. It includes the result of a tax calculation, the relevant underlying parameters which can be processed by ERP-systems and/or indirect tax / custom duties systems, and data needed to comply with indirect tax and customs duties legislation and formalities.

#### 2 Normative references

The following documents are referred to in the text in such a way that some or all of their content constitutes requirements of this document. For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies.

ISO 3166-1, Codes for the representation of names of countries and their subdivisions — Part 1: Country code

ISO 3166-2, Codes for the representation of names of countries and their subdivisions — Part 2: Country subdivision code

ISO 4217, Codes for the representation of currencies

ISO 8601-1, Date and time — Representations for information interchange — Part 1: Basic rules

ISO/IEC 14957:2010, Information technology — Representation of data element values — Notation of the format

ISO 21378:2019, Audit data collection standard

#### 3 Terms and definitions

For the purposes of this document, the terms and definitions given in ISO 21378 and the following definitions apply.

ISO and IEC maintain terminological databases for use in standardization at the following addresses:

- ISO Online browsing platform: available at <a href="https://www.iso.org/obp">https://www.iso.org/obp</a>
- IEC Electropedia: available at <a href="http://www.electropedia.org/">http://www.electropedia.org/</a>

#### 3.1

#### indirect tax

tax levied and collected by an intermediary on goods and services before they reach the consumer, who ultimately pays the tax as part of the market price of the goods or services purchased

#### 3.2

#### consumption tax

*indirect tax* (3.1)on the purchase of a good or service which can take the form of sales taxes, tariffs, excise, and other taxes on consumed goods and services

#### 3.3

#### **VAT**

tax collected at all stages of the processes of production and distribution of goods and services, accumulation of the tax being prevented by allowing businesses to deduct the tax which incurs on their inputs from the tax collected on their outputs

Note 1 to entry: For readability, this document uses the term VAT, but other types of taxes, such as GST and sales tax, are explicitly included. In some cases, this document refers to a particular tax, such as GST or sales tax.

#### 3.4

#### custom duty

tax imposed on imports and exports of goods

#### 3.5

#### indirect tax audit

Indirect tax audit, means any audit, assessment, or other examination relating to *indirect taxes* (3.1) by any tax authority or any judicial or administrative proceedings relating to *indirect taxes* (3.1)

#### 3.6

#### custom duties audit

a structured examination to measure and improve the traders' compliance, after customs has released the cargo, of the relevant commercial data, sales contracts, financial and non-financial records, physical stock and other assets of traders

#### 3.7

#### characteristic

abstraction of a property of an entity or of a set of entities

[SOURCE: ISO/IEC 20924:2018, 3.1.6]

#### 3.8

#### lot

A number of units of an article, a single article, or a parcel of articles offered as one item (as in an auction sale)

[SOURCE: merriam-webster dictionary]

#### 3.9

#### serial number

code assigned by the supplier to an entity for its lifetime

[SOURCE: ISO 22742:2010(en), 3.37]

#### 3.10

#### jurisdiction

practical authority granted to a legal body to administer justice, as defined by the kind of case, and the location of the issue

#### 3.11

#### period

short or long part of the time with a beginning and end, whether or not specified, which is considered a unity because of its specific character, a typical phenomenon or a characteristic event within it

#### 3.12

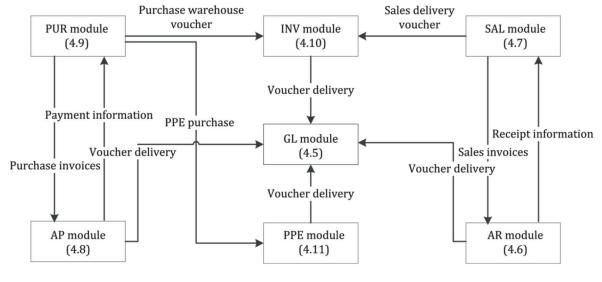
#### subset

the elements of which all belong to a given set

#### 4 Modules, tables and fields

#### 4.1 General

An overview of the business modules within ISO 21378 and select business events that demonstrate interaction points between the modules are shown in Figure 1 [SOURCE: ISO 21378].



#### Key

Components

Connections and lines

modules of the ISO 21378

— process flow

Figure 1 — Business modules in ISO 21378

ISO 21378 covers eight major business modules of Accounting and ERP systems, including:

- Base (BAS),
- General Ledger (GL),
- Sales (SAL),

#### ISO/DIS 5401:2023(E)

- Accounts Receivable (AR),
- Purchase (PUR),
- Accounts Payable (AP),
- Inventory (INV),
- Property Plant and Equipment (PPE).

These modules relate to major business processes including the areas of purchase, sales, inventory, fixed assets with the aim to identify and to specify data elements and file formats needed for auditing.

The standard formulates in this document is an extension on ISO 21378. This document contains additional tables to determine selection criteria and selection period, add necessary characteristics to purchase invoices, sales invoices, inventory products and inventory transactions and records reference information of the documents related to inventory transactions.

This document defines 7 tables. These tables all have a level 2 indication. ISO 21378 recognizes level 1 and level 2 tables. The designation difference is based on the use of the information by auditors. Level 1 tables are defined as tables containing information the auditor should leverage when auditing. However, depending on the system, this information can not be available. The level 2 table designation indicates that these tables contain information that the auditor can leverage if the scope of the audit requires this type of data.

Within each table, fields are also labeled as level 1 or level 2. Similarly to the table designations, level 1 fields are defined as fields containing information the auditor should leverage when auditing and where the data are available within the system. The level 2 field designation indicates that these fields contain information that the auditor can leverage if the scope of the audit requires this type of data.

There are situations where level 2 tables contain level 1 fields. This scenario indicates that this type of information may not be needed in some audit situations. However, if the data in the table are deemed to be required by the auditor, the level 1 fields within the level 2 table shall be included as they are key fields for the use of the information.

#### 4.2 Naming conventions

The naming conventions aim to help readers to have a clear understanding of each table and data element. They also conform to the requirements of major accounting and ERP systems and databases.

For used naming conventions in this document see ISO 21378.

For used abbreviated terms see ISO 21378.

Additional abbreviated terms used in this document are listed in Table 1 in this document.

**Abbreviation Full Name** ADC **Audit Data Collection** APAC Asian Pacific countries ΑT Austria BE Belgium CA Canada CHAR Characteristic **CUST** Customs DE Denmark DOC Document

Table 1 — Abbreviated terms

**Table 1** (continued)

Abbreviation	Full Name
DMS	Document management system
ES	Spain
EU	European Union
GB	Great Britain
GEN	General
GST	Good and services tax
HST	Harmonized sales tax
NL	Netherlands
PERC	Percentage
PST	Provincial sales tax
TARIC	TARif Intégré Communautaire
USA	United States of America
UN	United Nations
VAT	Value added tax
WCO	World Customs Organisation

#### 4.3 Representation and datatype of data elements

Representation specifications and datatype specifications of the data elements defined in this document, can be found in ISO 21378.

#### 4.4 Characteristics tables

The characteristic tables are used as an extension mechanism if the auditor needs additional information for a table to be audited. Additional information means that the information is not specified already in the existing tables of ISO 21378.

A characteristic is a property or attribute of a document, product or transaction. The characteristics are important for the audit to be carried out. Which characteristics are relevant depends on the type of audit, the region, the country, or the type of auditor. Because different audits are possible, in a multitude of regions, countries and for different supervisory authorities, it is impossible to establish a globally standardized list of characteristics. Auditors and auditees therefore have to jointly establish a list of permitted and required characteristics.

Examples of characteristic are:

- Goods/Service indicator,
- Jurisdiction identifier,
- Tax point date,
- Size of the business of the taxpayer,
- Status of the product,
- Gross weight minus the tare weight of the packaging,
- Commodity code according to the tariff of the goods used. Commodity code is also referred as TARIC code,
- Alcohol percentage.

#### ISO/DIS 5401:2023(E)

Characteristics can be standardized at world level, region level or country level. This is outside the scope of the standard described in this document.

#### 4.5 Base module

#### 4.5.1 General

The Base (BAS) module of ISO 21378 contains basic information that is used across multiple modules. Its content includes data related to the data collection, customers, suppliers, tax types, currency etc. Other modules (e.g., GL, SAL, PUR, INV) shall be used in conjunction with this module.

#### 4.5.2 BAS\_Selection\_Period

In the case of indirect tax audits or customs duties audits, it can not be necessary or even permitted to receive the data of the entire audit data collection (ADC) from auditees. In that case, customs and tax authorities shall receive a self-defined subset of the entire ADC in accordance with the scope of the audit. In general, it shall be able to derive subsets of the overall ADC that are predetermined and tailored to the purpose of the control data.

To reference the selection criteria for compiling the subset, and to define the selection period, table BAS\_Selection\_Period [Table 2] isadded to the base module in this document..

The selection criteria and dates that shall fall within the selection period, should be determined by mutual agreement between the auditor and the auditee.

BAS\_Selection\_Period is an extension to table BAS\_Profile. BAS\_Profile contains the proprietary data that led to the dataset. The fields Profile\_Number and Profile\_Name are therefore a name / reference of the auditee itself.

For a subset of ADC, all definitions, rules, and agreements that apply to the entire ADC also shall apply to that subset, unless this is deviated from in this document.

The unique identifier for the applied selection criteria, the selection period start date and end date that apply to the selected tables and selected fields are contained in <a href="Table 2">Table 2</a>. This table is level 2.

Rep-Da-No. Name resenta-**Description** Level tatype tion Unique identifier that refers to the selection criteria for selecting tables and fields. The permitted values of Selection ID and the associated selec-1 Selection\_ID %75s 1 String tion criteria should be determined by mutual agreement between the auditor and the auditee. EXAMPLE: "ADC Customs NL" Start date of the selected period (YYYY-2 Date %10s MM-DD). The start time is always 1 Selection\_Start\_Date "00:00:00". End date of the selected period (YYYY-3 MM-DD). The end time is always Selection\_End\_Date Date %10s 1 "23:59:59".

Table 2 — BAS\_Selection\_Period

#### 4.6 General ledger module

#### 4.6.1 General

The General ledger (GL) module in ISO 21378 is used to record the financial impacts of business processes. In most ERP systems and accounting packages, the GL is the module where transactional-level data are accumulated, summarized, stored and staged for reporting. Additionally, the closing entries for both periods and year-end are contained within these tables.

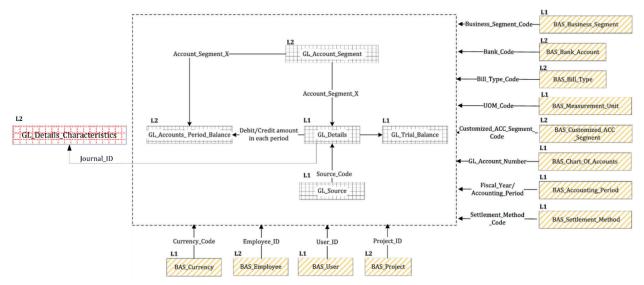
In the case of indirect tax audits, it can be necessary to add characteristic information upon the general ledger detail information because:

- Taxpayers can book certain indirect tax events only in the general ledger of their ERP system and not in other modules,
- There are adjustments due to non-deductibility that cannot be attributed to an individual transaction but are a periodic adjustment that is only recorded in the general ledger.

The characteristics should be delivered on the applicable granular level, which is at GL\_Details line level.

To exchange characteristic information, table  $GL_Details_Characteristics$  [Table 3] is added to the  $GL_Details_Characteristics$  [Table 4] is a function of  $GL_D$ 

Figure 2 shows the relation between a GL\_Details and its GL\_Details\_Characteristics.



## Key Components Connections and lines table in the BAS module ---- tables within the GL module table in the GL module → reference relationship table in customs and indirect tax extension L1 table containing information that the auditor should leverage when auditing

data

table containing information that the auditor can leverage if the scope of the audit requires this type of

Figure 2 — Table relation diagram of GL module

L2

#### 4.6.2 GL\_Details\_Characteristics

Additional characteristics that apply to GL\_Details lines are contained in <u>Table 3</u>. Examples include VAT status, jurisdiction identifier, tax point date, size of the business of the taxpayer etc. This table is level 2.

Table 3 — GL\_Details\_Characteristics

No.	Name	Da- tatype	Rep- resenta- tion	Description	Level
1	Journal_ID	String	%100s	Unique identifier for the journal entry.	1
1	Jour nar_1D	7,01000		Shall match the Journal_ID in the GL_Details table.	1
2	Characteristic_Type	String	%60s	Type of characteristic in relation to the GL_Details line. The permitted values of Characteristic_Type should be determined by mutual agreement between the auditor and the auditee.	1
				EXAMPLE NL_VATSTATUS	
3			%60s	The sequence number of a characteristic or group of related characteristics within the same Journal_ID.	
	Characteristic_Sequence_Number	String		The sequence number is mandatory if there are multiple characteristics of the same type within the same Journal_ID.	1
	Characteristic_UOM_Code	String	%80s	Code of measurement of the value of the characteristic, if applicable.	1
4				Shall match the UOM_Code in the BAS_Measurement_Unit table. EX-AMPLE PERC, KG	
				The value of the characteristic on basis of the Characteristic UOM Code. EXAMPLE	
5	Characteristic_Value	String	g %1000s	— 0,125 in case of alcohol percentage of 12,5 percent.	1
				L in case of low-rated VAT product.	
6	System_Characteristic_Value	String	%1000s	The value of the characteristic as recorded in the source system of the organization to be audited, on basis of the Characteristic UOM Code. EXAMPLE	1
J				— 0,125 in case of alcohol percentage of 12,5 percent.	
				— 1 in case of low-rated VAT product.	

The primary key and reference identifiers, with the related referenced fields and tables, for GL\_Details\_ Characteristics are listed in Table 4.

Table 4 — Identifiers in GL\_Details\_Characteristics

No.	Name	Identi- fier	Referenced field	Referenced table
1	Journal_ID	PK/ REF	Journal_ID	GL_Details
2	Characteristic_Type	PK	not applicable	not applicable
3	Characteristic_Sequence_Number	PK	not applicable	not applicable
4	Characteristic_UOM_Code	PK/ REF	UOM_Code	BAS_Measurement_Unit

#### 4.7 Sales module

#### 4.7.1 General

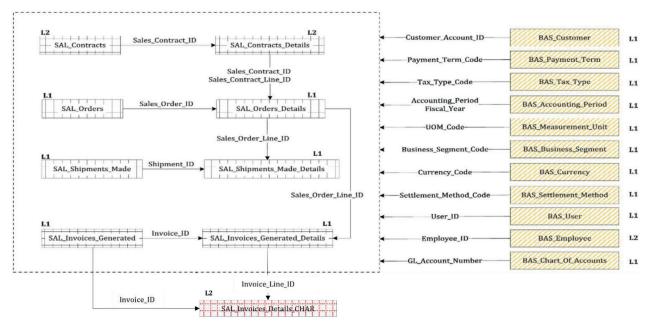
The SAL module of ISO 21378 is intended to encompass data collection and basic analysis of the sales process.

In the case of indirect tax audits, it can be necessary to add characteristic information upon invoices.

The characteristics should be delivered on the applicable granular level, which is at invoice level and invoice line level.

To exchange characteristic information, table SAL\_Invoices\_Details\_CHAR [<u>Table 5</u>] has been added to the SAL module in this document.

Figure 3 shows the relation between a SAL\_Invoices\_Generated, SAL\_Invoices\_Generated\_Details and it's SAL\_Invoices\_Details\_CHAR.



#### Key **Components Connections and lines** table in the BAS module tables within the SAL module table in the SAL module reference relationship table in customs and indirect tax extension L1 table containing information that the auditor should leverage when auditing table containing information that the auditor can leverage if the scope of the audit requires this type of L2 data

Figure 3 — Table relation diagram of SAL module

#### 4.7.2 SAL\_Invoices\_Details\_CHAR

Additional characteristics that apply to SAL\_Invoices\_Generated and SAL\_Invoices\_Generated\_Details are contained in Table 5. Examples include VAT status, jurisdiction identifier, tax point date, size of the business of the taxpayer etc. This table is level 2.

No.	Name	Da- tatype	Rep- resenta- tion	Description	Level
				Unique identifier for the invoice.	
1	Invoice_ID	String	%60s	The same ID shall be used for all tables with invoice data.	1
				Shall match the Invoice_ID in the SAL_Invoices_Generated table.	
2	Invoice_Line_ID	String	%60s	Unique identifier for the invoice line.  If not empty, it shall match the Invoice_Line_ID in the SAL_Invoic- es_Generated_Details table.	1

Table 5 — SAL\_Invoices\_Details\_CHAR

 Table 5 (continued)

No.	Name	Da- tatype	Rep- resenta- tion	Description	Level
3	Characteristic_Type	String	%60s	Type of characteristic in relation to the invoice or invoice line. The permitted values of Characteristic_Type should be determined by mutual agreement between the auditor and the auditee.	1
				EXAMPLE NL_VATSTATUS	
				The sequence number of a characteristic or group of related characteristics within the same Invoice_ID and Invoice_Line_ID combination.	
4	Characteristic_Sequence_Number	String	ring %60s	The sequence number is mandatory if there are multiple characteristics of the same type within the same Invoice_ID and Invoice_Line_ID combination.	1
				Code of measurement of the value of the characteristic, if applicable.	
5	Characteristic_UOM_Code	String	%80s	Shall match the UOM_Code in the BAS_Measurement_Unit table. EX-AMPLE PERC, KG	1
				The value of the characteristic on basis of the Characteristic UOM Code. EXAMPLE	
6	Characteristic_Value	String	%1000s	— 0,125 in case of alcohol percentage of 12,5 percent.	1
				L in case of low-rated VAT product.	
7	System_Characteristic_Value	String	%1000s	The value of the characteristic as recorded in the source system of the organization to be audited, on basis of the Characteristic UOM Code. EXAMPLE	1
				— 0,125 in case of alcohol percentage of 12,5 percent.	
				— 1 in case of low-rated VAT product.	

The primary key and reference identifiers, with the related referenced fields and tables, for SAL\_Invoices\_Details\_CHAR are listed in  $\underline{\text{Table 6}}$ :

Table 6 — Identifiers in SAL\_Invoices\_Details\_CHAR

No.	Name	Iden- tifier	Referenced field	Referenced table
1	Invoice_ID	PK/ REF	Invoice_ID	SAL_Invoices_Generated
2	Invoice_Line_ID	PK REF	Invoice_Line_ID	SAL_Invoices_Generated_Details
3	Characteristic_Type	PK	not applicable	not applicable
4	Characteristic_Sequence_Number	PK	not applicable	not applicable

#### Table 6 (continued)

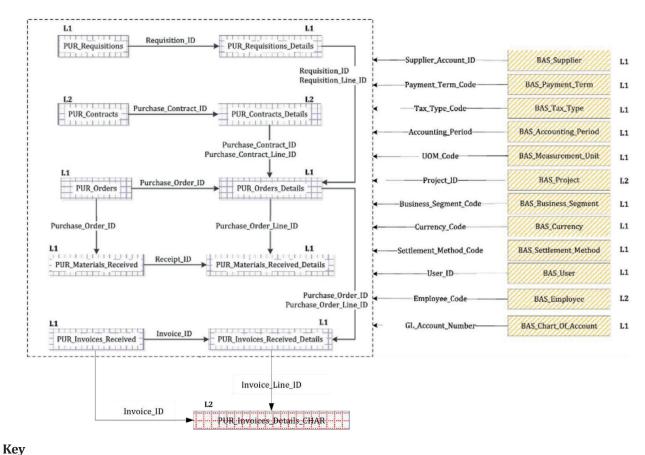
No.	Name	Iden- tifier	Referenced field	Referenced table
5	Characteristic_UOM_Code	PK/ REF	UOM_Code	BAS_Measurement_Unit

#### 4.8 Purchase module

#### 4.8.1 General

The PUR module of ISO 21378 is intended to encompass data collection and basic analysis of the purchase process. In the case of indirect tax audits, it can be necessary to add characteristic information upon invoices. The characteristics should be delivered on the applicable granular level, which is at invoice level and invoice line level. To exchange the characteristic information, table PUR\_Invoices\_Details\_ CHAR [Table 7] has been added to the PUR module in this document.

<u>Figure 4</u> shows the relation between a PUR\_Invoices\_Received, PUR\_Invoices\_Received\_Details and its PUR\_Invoices\_Details\_CHAR.



# Components Connections and lines L1 table in the BAS module Connections and lines L2 table in the BAS module L3 table in the PUR module The containing information that the auditor should leverage when auditing

table containing information that the address should reverage when address

L2 table containing information that the auditor can leverage if the scope of the audit requires this type of data

Figure 4 — Table relation diagram of PUR module

#### 4.8.2 PUR\_Invoices\_Details\_CHAR

Additional characteristics that apply to PUR\_Invoices\_Received and PUR\_Invoices\_Received\_Details are contained in <u>Table 7</u>. Examples include VAT status, jurisdiction identifier, tax point date, size of the business of the taxpayer etc. This table is level 2.

Table 7 — PUR\_Invoices\_Details\_CHAR

No.	Name	Da- tatype	Rep- resenta- tion	Description	Level
1	Invoice_ID	String	%60s	Unique identifier for the received invoices.  The same ID shall be used for all tables with invoice data.  Shall match the Invoice ID in the	1
2	Invoice_Line_ID	String	%60s	Shall match the Invoice_ID in the PUR_Invoices_Received table.  Unique identifier for the received invoice line.  If not empty, it shall match the Invoice_Line_ID in the PUR_Invoices_Received_Details table.	1
3	Characteristic_Type	String	%60s	Type of characteristic in relation to the invoice or invoice line. The permitted values of Characteristic_Type should be determined by mutual agreement between the auditor and the auditee.	1
4	Characteristic_Sequence_Number	String	%60s	EXAMPLE NL_VATITEMSTATUS  The sequence number of a characteristic or group of related characteristics within the same Invoice_ID and Invoice_Line_ID combination.  The sequence number is mandatory if there are multiple characteristics of the same type within the same Invoice_ID and Invoice_Line_ID com-	1
5	Characteristic_UOM_Code	String	%80s	bination.  Code of measurement of the value of the characteristic, if applicable.  Shall match the UOM_Code in the BAS_Measurement_Unit table. EX-AMPLE PERC, KG	1
6	Characteristic_Value	String	%1000s	The value of the characteristic on basis of the Characteristic UOM Code. EXAMPLE  — 0,125 in case of alcohol percentage of 12,5 percent.  — L in case of low-rated VAT product.	1
7	System_Characteristic_Value	String	%1000s	The value of the characteristic as recorded in the source system of the organization to be audited, on basis of the Characteristic UOM Code. EXAMPLE  — 0,125 in case of alcohol percentage of 12,5 percent.  — 1 in case of low-rated VAT product.	1

The primary key and reference identifiers, with the related referenced fields and tables, for PUR\_Invoices\_Details\_CHAR is listed in the next table:

Table 8 — Identifiers in PUR\_Invoices\_Details\_CHAR

No.	Name	Identi- fier	Referenced field	Referenced table
1	Invoice_ID	PK/ REF	Invoice_ID	PUR_Invoices_Received
2	Invoice_Line_ID	PK/ REF	Invoice_Line_ID	PUR_Invoices_Received_Details
3	Characteristic_Type	PK	not applicable	not applicable
4	Characteristic_Sequence_Number	PK	not applicable	not applicable
5	Characteristic_UOM_Code	PK/ REF	UOM_Code	BAS_Measurement_Unit

#### 4.9 Inventory module

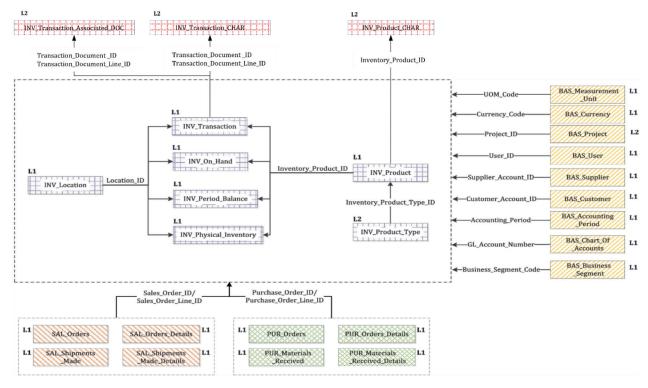
#### 4.9.1 General

Inventory (INV) is one of several business processes related to the supply chain. The INV module of the ISO 21378 is intended to encompass data collection and basic analysis of the inventory process (i.e. raw and auxiliary materials, work in progress and finished goods).

In the case of customs audits it can be necessary to add characteristic information upon inventory products and inventory transactions. The characteristics should be delivered on the applicable granular level, which is at inventory product level for individual items, and when possible, on product/serial level or product/lot level and inventory transaction level. To exchange the characteristic information, table INV\_Product\_CHAR [Table 9] and table INV\_Transaction\_CHAR [Table 11] is added to the INV module in this document.

Also, in case of customs audits it can be necessary to add reference information to customs related documents associated to inventory transactions. To exchange the document reference information table INV\_Transaction\_Associated\_DOC [Table 13] has been added to the INV module in this document.

<u>Figure 5</u> shows the relation between a INV\_Transaction and INV\_Transaction\_CHAR, INV\_Transaction and INV\_Transaction\_Associated\_DOC, INV\_Product and INV\_Product\_CHAR.



#### Key

## Components Connections and lines table in the BAS module table in the INV module table in the INV module table in customs and indirect tax extension Connections and lines tables within the INV module reference relationship

- L1 table containing information that the auditor should leverage when auditing
- L2 table containing information that the auditor can leverage if the scope of the audit requires this type of data

Figure 5 — Table relation diagram of INV module

#### 4.9.2 INV\_Product\_CHAR

Additional inventory product characteristics that apply from a certain start date and time until a certain end date and time are contained in <u>Table 9</u>. Examples include net weight, country of origin, legal indicator, alcohol percentage. This table is level 2.

No.	Name	Da- tatype	Rep- resenta- tion	Description	Level
1	Inventory_Product_ID	String	%75s	The unique identifier for the inventory item. Typically, auto generated by the system. Shall match the Inventory_Product_ID in the INV_Product table.	1

Table 9 — INV\_Product\_CHAR

 Table 9 (continued)

No.	Name	Da- tatype	Rep- resenta- tion	Description	Level
2	Characteristic_Type	String	%60s	Type of characteristic of the product.  The permitted values of Characteristic_Type should be determined by mutual agreement between the auditor and the auditee.  EXAMPLE EU_COMCODE, GEN_ALCPERC	1
3	Characteristic_Sequence_Number	String	%60s	The sequence number of a characteristic or group of related characteristics within the same Inventory_Product_ID.  The sequence number is mandatory if there are multiple characteristics of the same type within the same Inventory_Product_ID.	1
4	Characteristic_UOM_Code	String	%80s	Code of measurement of the value of the product characteristic, if applicable.  Shall match the UOM_Code in the BAS_Measurement_Unit table. EX-AMPLE PERC, KG	1
5	Start_Date	Date	%10s	Start date from which the product characteristic value became valid.	1
6	Start_Time	Time	%8s	Start time on the start date from which the product characteristic value became valid.	1
7	End_Date	Date	%10s	End date until which the product characteristic value was valid.	1
8	End_Time	Time	%8s	End time on the end date until which the product characteristic value was valid.	1
9	Characteristic_Value	String	%1000s	The value of the product characteristic on basis of the Characteristic UOM Code according to the Standard Characteristics table (to be developed). EXAMPLE  — 0,125 in case of alcohol percentage of 12,5 percent,  — L in case of low-rated VAT product.	1
10	System_Characteristic_Value	String	%1000s	The value of the product characteristic as recorded in the source system of the organization to be audited, on basis of the Characteristic UOM Code.  EXAMPLE  — 0,125 in case of alcohol percentage of 12,5 percent.  — 1 in case of low-rated VAT product.	1

The primary key and reference identifiers, with the related referenced fields and tables, for INV\_Product\_CHAR are listed in <a href="Table 10">Table 10</a>.

Table 10 — Identifiers in INV\_Product\_CHAR

No.	Name	Identifier	Referenced field	Referenced table
1	Inventory_Product_ID	PK/REF	Inventory_Product_ID	INV_Product
2	Characteristic_Type	PK	not applicable	not applicable
3	Characteristic_Sequence_Number	PK	not applicable	not applicable
4	Characteristic_UOM_Code	PK/REF	UOM_Code	BAS_Measurement_Unit
5	Start_Date	PK	not applicable	not applicable
6	Start_Time	PK	not applicable	not applicable

#### 4.9.3 INV\_Transaction\_CHAR

Additional inventory product characteristics that apply to the moment of the transaction are contained in <u>Table 11</u>. Examples include net weight, country of origin, legal indicator, alcohol percentage. This table is level 2.

Table 11 — INV\_Transaction\_CHAR

No.	Name	Da- tatype	Rep- resenta- tion	Description	Level
1	Transaction_Document_ID	String	%100s	The unique identifier for the picking ticket, shipping notice, or other document created upon or associated with movement. Typically, auto generated by the system. Shall match the Transaction_Document_ID in the INV_Transaction table.	1
2	Transaction_Document_Line_ID	String	%100s	The unique identifier for the line number for a document other than a customer order, or supplier purchase order. Typically, auto generated by the system. Shall match the Transaction_Document_Line_ID related to the Transaction_Document_ID in the INV_Transaction table.	1
3	Characteristic_Type	String	%60s	Standardized type of characteristic of the product in the transaction.  The permitted values of Characteristic_Type should be determined by mutual agreement between the auditor and the auditee.  EXAMPLE  NL_VATSTATUS  EU_COMCODE  GEN_ALCPERC	1

 Table 11 (continued)

No.	Name	Da- tatype	Rep- resenta- tion	Description	Level
				The sequence number of a characteristic or group of related characteristics within the same Transaction_Document_ID and Transaction_Document_Line_ID combination.	
4	Characteristic_Sequence_Number	String	%60s	The sequence number is mandatory if there are multiple characteristics of the same type within the same Transaction_Document_ID and Transaction_Document_Line_ID combination.	1
5	Characteristic_UOM_Code	String	%80s	The standardized code of measurement of the value of the transaction characteristic, if applicable. Shall match the UOM_Code in the BAS_Measurement_Unit table. EXAMPLE PERC, KG	1
				The value of the product characteristic on basis of the Characteristic UOM EXAMPLE	
6	Characteristic_Value	String	%1000s	— 0,125 in case of alcohol percentage of 12,5 of wine,	1
				— L in case of low-rated VAT product.	
7	System_Characteristic_Value	String	%1000s	The value of the product characteristic as recorded in the source system of the organization to be audited, on basis of the Characteristic UOM Code. EXAMPLE	1
			,0=3000	— 0,125 in case of alcohol percentage of 12,5 of wine,	
				— 1 in case of low-rated VAT product.	

The primary key and reference identifiers, with the related referenced fields and tables, for  $INV_{-}$  Transaction\_CHAR are listed in <u>Table 12</u>.

Table 12 — Identifiers in INV\_Transaction\_CHAR

No.	Name	Identi- fier	Referenced field	Referenced table
1	Transaction_Document_ID	PK/ REF	Transaction_Document_ID	INV_Transaction
2	Transaction_Document_Line_ID	PK/ REF	Transaction_Document_Line_ID	INV_Transaction
3	Characteristic_Type	PK	not applicable	not applicable
4	Characteristic_Sequence_Number	PK	not applicable	not applicable
5	Characteristic_UOM_Code	PK/ REF	UOM_Code	BAS_Measurement_Unit

#### 4.9.4 INV\_Transaction\_Associated\_DOC

Reference information of a document which is associated with the inventory transaction is contained in <u>Table 13</u>. Examples include customs declaration. This table is level 2.

Table 13 — INV\_Transaction\_Associated\_DOC

No.	Name	Da- tatype	Rep- resenta- tion	Description	Level
1	Transaction_Document_ID	String	%100s	The unique identifier for the picking ticket, shipping notice, or other document created upon or associated with movement. Typically, auto generated by the system. Shall match the Transaction_Document_ID in the INV_Transaction table.	1
2	Transaction_Document_Line_ID	String	%100s	The unique identifier for the line number for a document other than a customer order, or supplier purchase order. Typically, auto generated by the system. Shall match the Transaction_Document_Line_ID related to the Transaction_Document_ID in the INV_Transaction table.	1
3	Transaction_Submitted_System	String	%100s	The identifier of the system in which the inventory transaction associated document is submitted.	1
4	Document_Code	String	%80s	The code of the inventory transaction associated document. The permitted values of Document_Code should be determined by mutual agreement between the auditor and the auditee.	1
				EXAMPLE Customs Declaration Form.	
5	Document_ID	String	%100s	The ID of the transaction associated referential document. For example, the number of the customs declaration form.	1
6	Document_Line_ID	String	%100s	The line ID of a line on the transaction associated referential document. For example, the line number on the customs declaration form.	1

The primary key and reference identifiers, with the related referenced fields and tables, for INV\_Transaction\_Associated\_DOC, are listed in <a href="mailto:Table 14">Table 14</a>:

Table 14 — Identifiers in INV\_Transaction\_Associated\_DOC

No.	Name	Identi- fier	Referenced field	Referenced table
1	Transaction_Document_ID	PK/ REF	Transaction_Document_ID	INV_Transaction
2	Transaction_Document_Line_ID	PK/ REF	Transaction_Document_Line_ID	INV_Transaction
3	Transaction_Submitted_System	PK	not applicable	not applicable
4	Document Code	PK	not applicable	not applicable

#### Table 14 (continued)

No.	Name	Identi- fier	Referenced field	Referenced table
5	Document ID	PK	not applicable	not applicable
6	Document Line ID	PK	not applicable	not applicable

#### Annex A

(informative)

#### Guidelines on how to use the extension for customs audits

#### A.1 General

The purpose of this annex is to explain how and which tables of audit data collection, together with the additional tables defined in this document, can be used for customs audits.

#### A.2 Customs audits recommendations

The most detailed level of information about goods in ISO 21378 is at product/serial or product/lot level. For many companies this is not granular enough; they use registration of product characteristic information at the combination of product/serial or lot number level on a certain date or within a certain period. For instance, the alcohol percentage of a liquid can be changed after a certain date, which can change the amount of excise duty (tax).

Characteristic information about goods and products on the level of product/serial number or product/ lot number and on a certain date or during a certain period, can be required for auditing goods movements, including import and export.

Also, the reference to source documents may be required. The purpose is matching transactional information with data from another system, for instance governmental, food regulators, quality surveyors, etc.

Product characteristics and reference information may be added to the ISO 21378 inventory module by the tables defined in this document, without changing the existing tables in the inventory module.

Dutch customs authority prefers to receive a part of the ISO 21378 that is focused on the control work of customs.

In general, customs checks the initial stock of the selected period, the final stock and the transactions on the products within the period.

In addition, customs checks the data related to the product, such as the corresponding purchase invoice, sales invoice, customer, supplier, history of the product characteristics, balance values and references to related external documents.

#### A.3 ADC subset for customs audits

The purpose of the ADC subset for customs is to assess the quality of the administration of goods movements and to check the connection to the administration of the customs authority. A customs subset may be specified for that purpose.

The applied selection period and selection ID, which is the name of the type of subset, should be included in the BAS\_Selection\_Period [Table 2]

An ADC subset for Dutch customs for instance, contains the following tables:

- BAS Profile
- BAS\_Selection\_Period
- BAS\_User

- BAS\_Customer\_Type
- BAS\_Customer
- BAS\_Supplier\_Type
- BAS\_Supplier
- BAS\_Accounting\_Period
- BAS\_Currency
- BAS\_Measurement\_Unit
- BAS\_Project
- BAS\_Tax\_Type
- SAL\_Invoices\_Generated
- SAL\_Invoices\_Generated\_Details
- PUR\_Invoices\_Received
- PUR\_Invoices\_Received\_Details
- INV Location
- INV\_Product\_Type
- INV\_Product
- INV\_Product\_CHAR
- INV\_On\_Hand
- INV\_Transaction
- INV\_Transaction\_CHAR
- INV\_Transaction\_Associated\_DOC
- INV\_Physical\_Inventory
- INV\_Period\_Balance

Which dates should fall within the selection period is agreed between auditee and auditors. Dutch customs audits concern the dates relating to goods movements and stock levels in the ISO 21378 tables INV\_Transaction, INV\_On\_Hand, INV\_Physical\_Inventory and INV\_Period\_Balance.

In the case of the invoices, it can be possible that the invoice date falls outside the selection period, but the details of this invoice should be included in the subset for verification purposes.

#### A.4 Characteristics relevant for customs audits

Table INV\_Product\_CHAR [Table 9] should add characteristic information upon the basis product information. If possible, this information should be delivered on the most granular level, which is at product level for individual items, and when possible, on product/serial level or product/lot level. The characteristic information should include the validity start date and time.

Start\_Date, Start\_Time, End\_Date and End\_Time can be required attributes, as the applicability of master data can change over time and the exchanged data set should reflect these changes. An example is the change of the commodity code for a product due to new classification rules. Another example

#### ISO/DIS 5401:2023(E)

is the change of a VAT rate, as the tax authorities can have decided to reduce the tax rate for the item concerned.

Characteristic information can change during the reporting period. Therefore, basic characteristic information on product/serial or product/lot level is not sufficient. Also, on Inventory Transaction level the product characteristic information can be required when the transaction affects one of the possible characteristics.

Therefore, table INV\_Transaction\_CHAR [<u>Table 11</u>] should add transaction characteristics to table INV\_Transaction.

Customs organizations can determine the type of product characteristics and type of transaction characteristics themselves, in consultation with the supplying parties of the audit data. Characteristics can be subdivided into general characteristics, regional specific characteristics and country specific characteristics. Examples of characteristics are:

- Status of the product,
- Gross weight minus the tare weight of the packaging,
- Commodity code according to the tariff of the goods used. Commodity code is also referred as TARIC code,
- Alcohol percentage,
- Owner goods,
- Invoice owner goods,
- VAT status,
- Customs country of origin,
- Customs status,
- Customs indicator legal statement,
- Customs transfer,
- Customs value.
- Customs quantity.

#### A.5 Associated documents relevant for customs audits

Reference information to associated source documents is contained in INV\_Transaction\_Associated\_DOC [Table 13]. The purpose is matching transactional information out of the ERP system with data from another system, for instance Governmental, Food regulators, Quality Surveyors, etc. Not only auditors working for regulators, but also auditors of the company itself (conformation of compliance, check on completeness of dealing with liabilities) should be able to check the regulatory requirements of any kind. The most far-reaching regulation of the US Securities and Exchange Commission (SEC) is the Dodd Frank act (issued the rule that requires companies to report publicly on their due diligence and to have their reports independently audited). Multiple documents can be associated with one transaction. Therefore, there should be the possibility for references to more than one document.

#### Some examples:

- Reference to declaration systems (in international perspective),
- Reference to other controlling government bodies, e.g., test reports,
- Reference to private monitoring bodies, e.g., surveyors,

The external numbers assigned by a buyer or seller or contract partner.

EXAMPLE Customs declaration form.

#### A.6 Example: customs audit

The example consists of two parts. The first part consists of the receipt of customs goods in a bonded warehouse. The second part deals with the importation of part of that lot.

Company "XYZ" is established in country "ABC". In country "ABC" customs legislation is based on a suspension system. Company "XYZ" uses several customs procedures, and the stock can be distinguished from customs into:

- free goods: goods that are free of customs duties in country "ABC",
- excise goods: goods that are free of customs duties in country "ABC" with the exception that excise duty (or consumption tax) has not yet been paid (i.e., suspended),
- customs goods: goods under customs supervision, all applicable duties have not yet been paid (i.e., suspended).

Excise duty can seem strange. Not just that countries can call this a consumption tax. There are countries also where this can not be a task for customs. In the latter case, this part of the example shows that other auditors (consumption tax) can easily match the proposed structure of the characteristics tables.

In the examples, a classification system for characteristics is applied. The characteristics are subdivided into general (GEN), regional (e.g., EU), and country specific (e.g., NL). In addition, there is a subdivision by type of supervision (e.g., CUST, VAT). The characteristic type code is compiled on this basis, using capital letters and underscores to separate the classification layers, as an example GEN\_ALCOHOLPERC is a general alcohol percentage, NL\_CUST\_COMMODITYCODE is a commodity code determined by Dutch customs,

#### Part 1: Inbound

Company "XYZ" receives a consignment of product "AB4567B" (lot number ENT001). These are customs goods and company "XYZ" stores these goods in its bonded warehouse. In order to store the goods in the bonded warehouse, company "XYZ" should submit a customs declaration. For the storage of customs goods, company "XYZ" should fill all three tables from the customs extension (module Inventory) with the corresponding characteristics. As stated earlier, it is assumed that the tables INV\_Product and INV\_Transaction, are filled in accordance ISO 21378. Table A.1 and Table A.2 show a few fields that are required for the completion of this example.

Table A.1 — Example of INV\_Product

Inventory_Product_ID	Inventory_Product_Code	Lot_Number
PRENT001	AB4567B	ENT001

Table A.2 — Example of INV\_Transaction

Transaction_	Transaction_Docu-	Transaction_	Transaction_Quantity	Inventory_	Lot_Num-
Document_ID	ment_Line_ID	Type		Product_ID	ber
VM98765	0001	RECEIPT	40	PRENT001	ENT001

Table INV\_Product\_CHAR [Table 9] lists the characteristics that apply to the product and are important for the customs. Multiple characteristics may apply to a product from table INV\_Product. A characteristic at the level of a product, missing in ISO 21378, is the customs status – in this case – of product "AB4567B". In this example the customs status is "bonded warehouse". The result is shown in Table A.3 and Table A.4.

Table A.3 — Example of INV\_Product

Inventory_Product_ID	Inventory_Product_Code	Lot_Number
PRENT001	AB4567B	ENT001

#### Table A.4 — Example of INV\_Product\_CHAR

Product_ID	Characteristic_Type	Characteristic_ Sequence_Num- ber	Characteristic_Value
PRENT001	NL_CUST_STATUS	1	BONDED WAREHOUSE

This is just an example of one characteristic. Which characteristics apply depends on, for example, the applied customs procedure. For example, it is possible that in a certain situation the country of origin is a characteristic. In this example the characteristic is preceded by the letters NL. This addition stands for the Netherlands. This makes the use of characteristics flexible, and dependent on a country (or other area). Another country (or union or region) may include its own characteristics. The naming of the characteristic is very important for the development of analysis tools. In anticipation of the continuation of the example, it has now become apparent that this structure / principle may also be applied to indirect taxes.

In addition to the characteristics at the level of the product, there are also characteristics applicable at the level of the transaction. Table INV\_Transaction\_CHAR [ $\underline{\text{Table 11}}$ ] lists the characteristics that apply to the transaction and are important for customs. Multiple characteristics may apply to a transaction from table INV\_Transaction. A characteristic at the level of a transaction, missing in ISO 21378, is the customs commodity code – in this case – of product "AB4567B". The result is shown in  $\underline{\text{Table A.5}}$  and  $\underline{\text{Table A.6}}$ 

Table A.5 — Example of INV\_Transaction

Transaction_Document_ID	Transaction_Document_Line_ID	
VM98765	0001	

#### Table A.6 — INV\_Transaction\_CHAR

Transac- tion_Docu- ment_ID	Transac- tion_Docu- ment_Line_ ID	Characteristic_Type	Character- istic_Se- quence_ Number	Char- acteris- tic_UOM_ Code	Character- istic_Value	System_Char- acteristic_ Value
VM98765	0001	NL_CUST_	1		2204568090	2204568090
		COMMODITYCODE				

Table INV\_Transaction\_Associated\_DOC [Table 13] lists the data needed to establish a relationship between the transaction and the customs administration. This includes only three data elements. First, the system (customs declaration system) in which the customs declaration has been submitted. Next the declaration number and finally the declaration line number. In this way the relationship can be established. The result is shown in Table A.7 and Table A.8.

Table A.7 — Example of INV\_Transaction

Transaction_Document_ID	Transaction_Document_Line_ID	
VM98765	0001	

Table A.8 — Example of INV\_Transaction\_Associated\_DOC

Transaction_ Document_ID	Transaction_ Document_Line_ ID	_ · · · · · · · -	Document_Code	Document_ID	Document_ Line_ID
VM98765	0001	DMS	FII DMSIMPORT	NL275ABD98AB62	0002

This example shows that customs know that these are customs goods, and customs have the data to be able to establish a relationship with the data (the customs declaration), because customs have it in their document management system.

#### Part 2: Import

In table INV\_Transaction\_CHAR [<u>Table 11</u>] a distinction is made between two values, a standard value and a system value. This example (import) focuses on this distinction.

Company "XYZ" sells half of product "AB4567B" with lot number "ENT001". This part is imported before the outbound takes place. Company "XYZ" submits a customs declaration, in accordance to the legislation. Excise duty (or consumption tax) also applies to these goods, as well as VAT (or GST).

The product is already known in the administration. As a result, there is no new registration in tables INV\_Product and INV\_Product\_CHAR [Table 9]. Company "XYZ" records the transaction in the INV\_Transaction table (Transaction\_Document\_ID = TR123456 and Transaction\_Document\_Line ID = 0001). Because the product is under customs supervision (the goods are customs goods), the tables INV\_Transaction\_CHAR [Table 11] and INV\_Transaction\_Associated\_DOC [Table 13] apply. The result is shown in Table A.9 and Table A.10.

Table A.9 — Example of INV\_Transaction

Transaction_Document_ID	Transaction_Document_Line_ID
TR123456	0001

Table A.10 — Example of INV\_Transaction\_CHAR

Transac- tion_Docu- ment_ID	Transaction_ Document_ Line_ID	Characteristic_Type	Character- istic_Se- quence_ Number	Charac- teristic_ UOM_Code	Characteris- tic_Value	System_ Characteris- tic_Value
TR123456	0001	NL_CUST_	1		2204568090	2204568090
		COMMODITYCODE				
TR123456	0001	GEN_ALCOHOLPERC	1	PERC	0,125	12,5
TR123456	0001	NL_ACCCAT	1		23	W3
TR123456	0001	NL_VATSTATUS	1		S	1

Only the characteristics that matter in a transaction are added. Further, the unit of measurement is also only filled if applicable (alcohol percentage). The representation depends on the characteristic type.

For some characteristics, there is a choice of whether the characteristic is part of table INV\_Product\_CHAR [Table 9] or INV\_Transaction\_CHAR [Table 11] (not all characteristics have that choice). The commodity code is an example where the choice exists. In principle, the commodity code is a fixed item of information, which is linked to the product. However, commodity codes can change. When the commodity code is recorded as part of table INV\_Product\_CHAR [Table 9] (at the moment of receipt or at an earlier time), this characteristic and value no longer needs to be included in table INV\_Transaction\_CHAR [Table 11]. If then the commodity code changes, then it is possible to make a change in table INV\_Product\_CHAR [Table 9] with a new record and a new start date. If the commodity code changes regularly, it is easier to include this characteristic in table INV\_Transaction\_CHAR [Table 11] (every transaction).

#### ISO/DIS 5401:2023(E)

This choice also offers another option. The alcohol percentage is a good example. It is possible that a percentage of 12,5 % is written on all underlying documents (invoice, bill of lading, etc.). Company "XYZ" includes this data as a characteristic in table INV\_Product\_CHAR [Table 9]. One month later and again two months later, parts of this lot are released. Company XYZ conducts a lab test before the goods are released to determine the actual alcohol percentage. The first result shows a percentage of 12,3 % and the second a percentage of 12,6 %.

It is possible to change the value for the characteristic (alcohol percentage) in table INV\_Product\_CHAR [Table 9], every time after a lab test. In that situation the question is still if it is correct. With the knowledge that the alcohol percentage is recorded in table INV\_Product\_CHAR [Table 9], it is also possible to record the alcohol percentage in table INV\_Transaction\_CHAR [Table 11], if it deviates from the value for that characteristic in table INV\_Product\_CHAR [Table 9]. The characteristic in table INV\_Transaction\_CHAR [Table 11] overrules the value of that characteristic in table INV\_Product\_CHAR [Table 9], just for that specific transaction.

Table INV\_Transaction\_Associated\_DOC [<u>Table 13</u>] lists the data needed to establish a relationship between the transaction and the customs administration. In this case a reference is included to the system in which the declaration is included. This also applies to sales tax (VAT).

The result of the tabel INV\_Transaction and INV\_Transaction\_Associated\_DOC [<u>Table 13</u>] is shown in Table A.11 and Table A.12.

Table A.11 — Example of INV\_Transaction

Transaction_Document_ID	Transaction_Document_Line_ID
TR123456	0001

Table A.12 — Example of INV\_Transaction\_Associated\_DOC

Transaction_ Document_ID	Transaction_Docu- ment_Line_ID	Transac- tion_Submit- ted_System	Document_Code	Document_ID	Document_ Line_ID
TR123456	0001	DMS	NL_DMSIMPORT	NL275ABD98AB62	0002
TR123456	0001	DMS	NL_VATMONTHLY	2021-04	0038

#### Annex B

(informative)

#### Guidelines on how to use the extension for indirect tax audits

#### **B.1** General

The purpose of this annex is to explain how and which tables of audit data collection, together with the additional tables mentioned in this document, can be used for indirect tax audits.

#### **B.2** Indirect tax audits recommendations

Characteristic information in detail, about the customer, vendor, goods, services, location, size of business etc. that apply to the invoices and business events, can be required for auditing indirect tax, especially to review, analyse and validate the reported VAT treatment, based on the underlying explanatory variables.

With this characteristics, local authorities and auditing companies can have an additional tool to determine whether the audited company has paid the correct tax at the right time, in accordance with domestic tax legislation. The auditor can obtain and evaluate the available audit evidence as part of the audit assurance process to reach an opinion as to whether a tax return is correct.

In principle tax coding in ERP and accounting systems is a subdivision of a tax type mentioned in BAS\_Tax\_Type. The information stored in such tax codes can provide insight in the additional characteristics. However, the tax information per invoice detail line contains only a tax type and tax amount. Information about the region and type of transaction, for example, may be also required for tax audits. This is displayed in <u>Table B.1</u>, <u>Table B.2</u> and <u>Table B.3</u>

Table B.1 —	Tax	infor	mation	exampl	e: EII

		Information stored in Invoice Details		
Scenario	Type of transaction	TaxType1	TaxAmount1	
1	Sale of goods (for 100) in the EU-country-1 subject to standard rated VAT (e.g., 20 %)	Value indicating EU-country-1 VAT	20 (example)	
2	Export sale of goods (for 100) from the EU-country-1, subject to 0 % VAT	Value indicating EU-country-1 VAT	0	
3	VAT exempt supply of a service (for 100) in EU-country-1	Value indicating EU-country-1 VAT	0	
4	VAT taxable supply of service (for 100) provided by a local supplier to an EU customer outside EU-country-1, VAT reverse charged to the customer	Value indicating EU-country-1 VAT	0	

Table B.2 — Tax information example: Asian-Pacific-Countries (APAC)

		Information stored in Invoice Details		
Scenario	Type of transaction	TaxType1	TaxAmount1	
1	Sale of goods (for 100) in APAC-country-2 subject to standard rated GST (e.g., 10 %)	Value indicating APAC-country-2 GST	10	
2	Export sale of goods (for 100) from APAC-country-2 to Rest-of-the-World, subject to 0 % GST	Value indicating APAC-country-2 GST	0	

**Table B.2** (continued)

		Information stored in Invoice Details		
Scenario	Type of transaction	TaxType1	TaxAmount1	
3	VAT exempt supply of a service (for 100) in APAC-country-2	Value indicating APAC-country-2 GST	0	
4	Sale of goods (for 100) subject to reverse charge in APAC-country-2	Value indicating APAC-country-2 GST	0	

Table B.3 — Tax information example: South Africa

		Information stored in Invoice			
Scenario	Type of transaction	TaxType1	TaxAmount1		
1	Sale of goods (for 1000) in Africa-country-3 subject to standard rated VAT (e.g. 15 %)	Value indicating Africa-country-3 VAT	150		
2	Export sale of goods (for 1000) from Africa-country-3 to Rest-of-the-World, subject to 0% VAT	Value indicating Africa-country-3 VAT	0		
3	VAT exempt supply of a service (for 1000) in Africa-country-3	Value indicating Africa-country-3 VAT	0		

Because the moment at which a transaction is taxed can differ from country to country, due to differences in laws and regulations, and from one type of transaction to another. For example, it can be the invoice date, the delivery date, the payment date, a fixed date in the case of continuous performance or otherwise. By using 'date to which tax is calculated' it can be unambiguously reported and subsequently used for data analyses by the auditor.

Indirect taxes may be levied on a national bases (e.g., VAT in the EU), but can also be levied on a lower level (e.g., state sales and use taxes, and city sales taxes in the USA). In many cases, these levels are applicable simultaneously, forming a 'hybrid' tax system (apart from the USA, examples of countries charging indirect tax at a national level and at a state/provincial/city level include Brazil, Canada and India). To deal with this in a meaningful way, the concept of tax jurisdiction is introduced.

For indirect taxes, the executive or practical authority can be recognized at various levels. For indirect tax purposes it is necessary to be able to determine the applicable jurisdiction. For this, a table may be set up, which links tax type with tax jurisdiction and country. Table B.4 contains a simplified example.

Table B.4 — Fiscal Jurisdictions

Tax Type	Tax Jurisdiction	ISO Country	Description
VAT	AT	AT	Austria
VAT	BE	BE	Belgium
VAT	ES	ES	Spain: mainland
VAT	ES-CN	ES	Spain: Canary Islands
VAT	ES-CE	ES	Spain: Ceuta
GST	CA	CA	Canada
PST	CA-BC	CA	Canada: British Colombia
HST	CA-ON	CA	Canada: Ontario

For a tax jurisdiction, the applicable tax treatment (taxed or exempt) and tax rate may differ. At a jurisdictional level, the actual tax treatment can result from the tax rate applicable to the following aspects:

 Product/item: e.g., reduced rate for food, standard rate for telecommunications, super rate for luxury goods and exempt for financial services,

- Business partner: e.g., standard rate for regular consumers, zero-rate for embassies/UN organizations,
- Place of supply: zero-rate/exempt for supply abroad, reduced rates for specified regions, zero-rate for free trading zones, VAT warehouse.
- Size of the business of the taxpayer: e.g., regular versus small-scale taxpayers,
- Type of industry: for certain types of industries specific rules may apply.

The above should be suitable for all taxes based on accounting entries, even down to line level, and encompasses both direct and indirect taxes. However, the determination of tax liability of direct and indirect taxes can require information not normally found in an accounting system. For the ADC the additional characteristics should be classified into several categories/aspects. The additional categories to consider are:

- Taxable transactions: Both goods and services,
- Taxable amount and rates: VAT rate structures and VAT exemptions, as they can relate to the business partner, place of supply or the product/items,
- Taxable amount and rates: application of margin schemes,
- Tax point date.
- Deductions: mechanism of charging VAT on sales and allowing business to deduct input tax.

Goods can be defined for as any physical or tangible thing. Supply of items other than goods can be classified as services, excluding transfers of cash, property rights and similar items. The distinction between goods and services is important as their tax treatment, determination and/or reporting, can be different.

Tangible property includes any physical goods. Electricity, gas, heat or cooling energy and the like may be considered as a tangible property for the VAT purposes as well as certain interests in immovable property amongst others. As the actual classification can differ per jurisdiction, an entry in the classification can be jurisdiction specific.

#### **B.3** Characteristics relevant for indirect tax audits

Invoice and business events characteristics can be added to the ISO 21378 Sales module and Purchase module by using the tables SAL\_Invoices\_Details\_CHAR [Table 5] and PUR\_Invoices\_Details\_CHAR [Table 7], or characteristic information can be added upon the general ledger details by table GL\_Details\_Characteristics [Table 3] in case of

- Taxpayers can book certain indirect tax events only in the general ledger of their ERP system and not in other modules,
- There are adjustments due to non-deductibility cannot be attributed to an individual transaction but are a periodic adjustment that is only recorded in the general ledger.

Examples of characteristics:

- Goods/Service indicator,
- Jurisdiction code,
- Tax point date,
- VAT rate,
- VAT rate structure,

#### ISO/DIS 5401:2023(E)

- VAT exemption,
- Margin scheme,
- Ship-from address,
- Ship-to address,
- Place of establishment,
- Residence, e.g., consumers,
- Plant, e.g., for sales without transport of goods. Can also include place not determined as high seas
   cargo in transport).
- Tax status of a specific location (e.g., free trade-zone, customs warehouse, VAT warehouse).
- Type of product, e.g., reduced rate for food, standard rate for telecommunications, super rate for luxury goods and exempt for financial services,
- Type of business partner, e.g., standard rate for regular consumers, zero-rate for embassies/UN organizations,
- Place of supply, e.g., zero-rate/exempt for supply abroad, reduced rates for specified regions, zero-rate for free trading zones, VAT warehouse,
- Size of the business of the taxpayer, e.g., regular versus small-scale taxpayers,
- Type of industry: for certain types of industries specific rules may apply.
- Type of transactions: both goods and services,
- Taxable amount and rates: VAT rate structure and VAT exemptions, related to business partner, place of supply or the type of product,
- Deductions: mechanism of charging VAT on sales and allowing business to deduct input tax.

#### **B.4** Example: VAT audit

The example consists of three parts. The first part is about exempt items, the second part is about layering indirect taxes and the third part is about supply of alcoholic items subject to customs control.

In the examples, a classification system for characteristics is applied. The characteristics are subdivided into general (GEN), regional (e.g., EU), and country specific (e.g., NL). In addition, there is a subdivision by type of supervision (e.g., CUST, VAT). The characteristic type code is compiled on this basis, with capital letters and underscores to separate the classification layers, as an example GEN\_ALCOHOLPERC is a general alcohol percentage, EU\_INTRASTATVALUE an Intrastat value used within the European Union, NL\_VAT\_STATUS is a VAT status determined by the Dutch tax authorities,

#### Exempt items (e.g., children's wear)

In the Netherlands, children's wear is subject to standard rate for VAT, in the UK there is an exemption. Let's suppose that the first transaction in 2021 is to a NL customer and the second transaction is to UK customer. This is shown in Table B.5.

Table B.5 — SAL\_Invoices\_Details\_CHAR

Invoice_ID	Invoice_Line_ ID	Characteris- tic_Type	Character- istic_Se- quence_ Number	Char- acteris- tic_UOM_ Code	teristic_	System_ Charac- teristic_ Value
202100021	202100021001	NL_VAT_STATUS	1		S	1
202100022	202100022001	GB_VAT_STATUS	1		Е	0

#### Exempt items (e.g., supply to embassies)

In a considerable number of countries, deliveries to embassies or consulates are exempt from VAT. In ERP systems, this is controlled by the status of the customer. Suppose the third transaction is a supply to an embassy based in Brussels, the fourth is a supply to a regular customer in Belgium and the fifth a B2B-supply from a Belgian warehouse to a French customer. This is shown in Table B.6.

Table B.6 — SAL\_Invoices\_Details\_CHAR

Invoice_ID	Invoice_ Line_ID	Characteristic_Type	Character- istic_Se- quence_ Number	Char- acteris- tic_UOM_ Code	Charac- teristic_ Value	System_ Charac- teristic_ Value
202100031		BE_VAT_BUSINESSPARTNERSTATUS	1		Е	5
202100032		BE_VAT_BUSINESSPARTNERSTATUS	1		S	1
202100033		BE_VAT_BUSINESSPARTNERSTATUS	1		K	

#### Layering indirect taxes (VAT and energy tax)

It is common that several indirect taxes are levied within the same jurisdiction. In some cases, the taxes are designed so that only one applies at the same time, but in many cases, they are 'stacked' or 'layered', with multiple taxes applying on the same invoice. An example of this can be seen with supplies of electricity, where in addition to VAT an energy tax is applicable in certain countries. In the EU, this energy tax is typically part of the taxable amount for VAT, making it a necessary attribute for auditors.

Let's consider the example of a Dutch electricity provider, supplying electricity to a charge point operator for electric vehicles. The supply is subject to a reduced Energy Tax rate and exempt from the Sustainable Energy Surcharge ("ODE"). The supply is subject to the regular NL VAT rate. This is shown in Table B.7.

Table B.7 — SAL\_Invoices\_Details\_CHAR

Invoice_ID	Invoice_ Line_ID	Characteristic_Type	Character- istic_Se- quence_ Number	Character- istic_UOM_ Code	Characteris- tic_Value	System_ Charac- teristic_ Value
202100041		NL_ENERGYTAXSTATUS	1		R	1
202100042		NL_ENERGYTAXAMOUNT	1	EUR	0,04	0,04
202100043		NL_ODE_STATUS	1		Е	0
202100044		NL_ODE_AMOUNT	1	EUR	0,00	0,00
202100045		NL_VAT_STATUS	1		S	1

#### Supply of alcoholic items subject to customs control

Let's suppose that the auditee is a microbrewery located in Belgium and that for the supply to the French customer, the alcohol percentage needs to be reported. Also, this transaction should be reported to the national office for statistics. This is shown in Table B.8.

#### ISO/DIS 5401:2023(E)

 $Table~B.8-SAL\_Invoices\_Details\_CHAR$ 

Invoice_ID	Invoice_Line_ID	Characteristic_Type	Character- istic_Se- quence_ Number	Charactris- tic_UOM_ Code	Character- istic_Value	System_ Charac- teristic_ Value
202100051		BE_VAT_BUSINESS	1		К	
		PARTNERSTATUS				
202100052	202100052001	GEN_ALCOHOLPERC	1	PERC	0,055	
202100053	202100053001	EU_INTRASTATVALUE	1	KG	1,000,00	

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- [8] Luxembourg, since 2013, Fichier Audit Informatisé AED or FAIA, required by law (National standard, derived from OECD-SAF-T)
- [9] France, since 2014, *Fichier des écritures comptables (FEC*), required by law (National standard, derived from OECD-SAF-T)
- [10] Lithuania, since 2015 own SAF-T, required by law (National standard, derived from OECD-SAF-)
- [11] Portugal, since 2016 own *SAF-T PT*, required by law (National standard, derived from OECD-SAF-T)
- [12] Poland, since 2016 *Jednolity Plik Kontrolny (JPK) based on SAF-T*, required by law (National standard, derived from OECD-SAF-T)
- [13] Norway, since 2020 *Norwegian SAF-T Fina*ncial, required by law (National standard, derived from OECD-SAF-T)