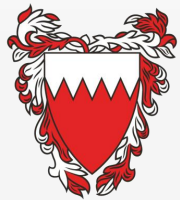


National Bureau for Taxation – Kingdom of Bahrain

Introduction to VAT

December 2018



National Bureau for Taxation



DISCLAIMER

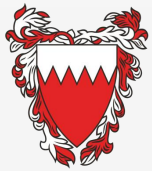
This Introduction to VAT is intended to provide general information only, and contains the current views of the National Bureau for Taxation on its subject matter. No responsibility is assumed for the VAT laws, rules or regulations in the Kingdom of Bahrain, and this Introduction should be used as a guideline only. This Introduction is not a legally binding document, and does not commit the National Bureau for Taxation or any taxpayer in respect of any transaction.

Taxpayers may contact the National Bureau for Taxation for advice, or a ruling, on any specific transaction or transactions. This Introduction is not a substitute for obtaining competent legal advice from a qualified professional.



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SECTION #1
VAT Basics



National Bureau for Taxation





Which States will introduce VAT?

Gulf Cooperation Council countries agreed to implement a Value Added Tax at a standard rate of 5%



VAT Implementation in the GCC

GCC Agreement

GCC		Effective by	Standard rate	
	<ul style="list-style-type: none">The GCC signed an Agreement to introduce Value Added Tax (VAT) in all Member StatesThe agreed VAT rate across all GCC Member States will be 5%While the Agreement provides a common legal framework, the detail on each State's VAT system and sector-specific rates was left to the discretion of each state through local legislation			
	Bahrain		January 2019	5%
	KSA		January 2018	5%
UAE		January 2018	5%	

VAT Implementation in the GCC will follow a coordinated approach

Note: Please refer to the Unified VAT Agreement for The Cooperation Council for the Arab States of the Gulf for further detail

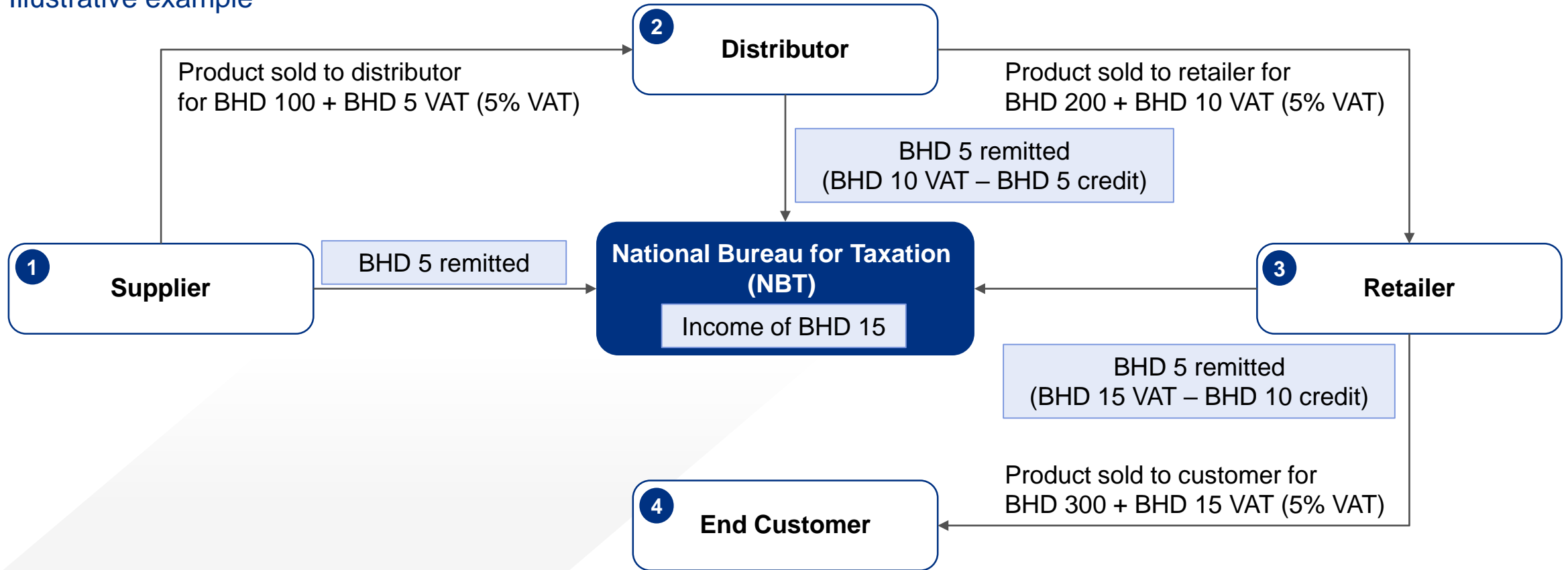
How does VAT work?

VAT is a consumption-based tax imposed at each stage of the product cycle



VAT Collection across the Supply chain

Illustrative example



National Bureau for Taxation will be the public authority responsible for tax collection






Who is subject for VAT?

VAT concerns economic activities conducted by Taxable Persons



Scope and key definitions

VAT Law – Article (1), Executive Regulations – Article (34)

	Economic Activity	<ul style="list-style-type: none">• Activity that is conducted in an ongoing and regular manner for the purpose of generating income• Includes commercial, industrial, agricultural or professional activities or services or any use of material or immaterial property and any other similar activity
	Taxable Person	<ul style="list-style-type: none">• A person that conducts an Economic Activity independently for the purpose of generating income• Registered or obligated to register for VAT
	Supply	<ul style="list-style-type: none">• Any form of Supply of goods or services for Consideration¹• Goods constitute all types of tangible property as well as water, electricity and gas, etc.• Services constitute everything that is not considered goods, whether domestic or imported
	Taxable Supplies	<ul style="list-style-type: none">• Supplies on which tax is charged, whether at the standard-rate or zero-rate, and for which associated input tax is deducted
	Annual Supplies²	<ul style="list-style-type: none">• The value of Annual Supplies must include: 1) Value of taxable supplies of goods and services 2) Value of deemed supplies³ 3) Value of Annual Supplies made by related parties 4) The value of goods and services supplied to a Taxable Person who is liable to pay tax due on these supplies

VAT to be imposed on Taxable Supplies made by a Taxable Person in the Kingdom

1. All that is received or expected to be received by the taxable supplier from a client or a third party for the Supply of goods or services, including tax
2. When determined by the National Bureau for Taxation, Annual Supplies will also encompass the value of intra-GCC Supplies which would have been taxable if made in the Kingdom
3. For example, surrendering goods which form part of business assets, other than for the purposes of an Economic Activity or changing the use of goods for the purpose of making non-taxable supplies

Note: Please refer to Article (1) of the VAT Law and Article (34) of the Executive Regulations for further detail

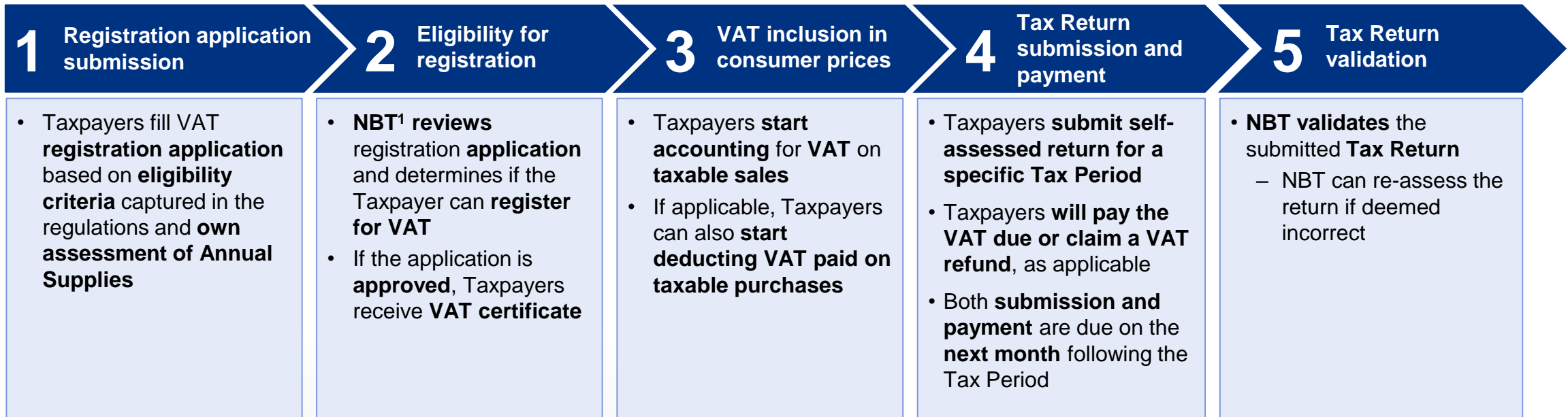
What is the overall VAT cycle?

Five key steps for Taxpayers



VAT cycle for Taxpayers

Illustrative



Deregistration	<ul style="list-style-type: none">• In cases where Taxable Persons meet deregistration criteria, they can either deregister voluntarily or be forced to deregister by the NBT
-----------------------	--

1. National Bureau for Taxation

Note: See Executive Regulations for further detail on each stage and associated processes

When is registration due?

Mandatory registration deadline is contingent on the value of annual Supply – with the continuous option for voluntary registration



Registration phasing and thresholds

Executive Regulations – Articles (33), (44) and (109)

Registration deadline	Transitional period		Steady state
	Dec 20 th 2018	June 20 th 2019	Dec 20 th 2019
Mandatory Registration Threshold ¹	> 5,000,000	> 500,000	> 37,500
Voluntary Registration Threshold ¹	>18,750	>18,750	>18,750

Specifications (non-exhaustive)

- **Taxable Persons required to register** shall apply for in accordance with the following **deadlines**
 - **30 days from the last day of the month** during which the **value of Annual Supplies** in the Kingdom **exceeds the Mandatory Threshold**
 - **30 days prior to the month** during which the **value of Annual Supplies** in the Kingdom is **expected to exceed the Mandatory Threshold**
- NBT² will **automatically register** the Taxable Person from the date its Supplies reach the **Mandatory Threshold** if it **fails to submit the application** for registration by the deadline³

1. Annual Supplies in BHD

2. National Bureau for Taxation

3. The registration provisions shall apply from such date and the Bureau shall notify the Person of his registration

Note: Please refer to Article (27) and (67) of the VAT Law and Articles (33), (44) and (109) of the Executive Regulations for further detail

When are VAT filings due during 2019?

Periods for filing Tax Returns during the transitional period depend on both Annual Supplies and registration date



Tax Return filing: Transitional period (2019)

Executive Regulations – Article (109)

Filing is due no later than the last day of the month following the end of the Tax Period

Filing schedules and deadlines

Annual Supplies in BHD	Registration date	Tax Period	Filing Period
> 5,000,000	Nov. – Dec. 2018	Jan. – Mar. 2019	Apr. 2019
		Apr. – Jun. 2019	Jul. 2019
		Jul. – Sep. 2019	Oct. 2019.
		Oct. – Dec. 2019	Jan. 2020
5,000,000 ≥ > 18,750	A Jan. – Jun. 2019	Jan. – Jun. 2019	A Jul. 2019
		Jul. – Sep. 2019	B Oct. 2019
		Oct. – Dec. 2019	Jan. 2020
	Jul. – Sep. 2019	Jul. – Sep. 2019	Oct. 2019
		Oct. – Dec. 2019	Jan. 2020
		Oct. – Dec. 2019	C Jan. 2020

Specifications

- A** For Taxable Persons whose registration takes effect after the Law comes into force but before 1 Jul. 2019, the first Tax Period shall commence on the effective date of their registration and shall end on 30 Jun. 2019, regardless of value of annual supplies
- B** For Taxable Persons whose registration takes effect on or after 1 July 2019, but before 1 Oct. 2019, the first Tax Period shall commence on the effective date of their registration and shall end on 30 Sep. 2019, regardless of value of annual supplies
- C** For Taxable Persons whose registration takes effect on or after 1 Oct. 2019 but before 31 Dec. 2019, the first Tax Period shall commence on the date of their registration and shall end on 31 Dec. 2019, regardless of value of annual supplies

Note: Please refer to Article (109) of the Executive Regulations for further detail

When are VAT filings due during 2020 and onward?

Periods for filing Tax Returns during the steady state depend on Annual Supplies



National Bureau for Taxation

Tax Return filing: Steady state (2020 and onward)

Executive Regulations – Article (48)

Filing schedules and deadlines

Taxable Person (Annual Supplies in BHD)	> 3,000,000	Monthly filing	➤	<table border="1"> <tr> <td>Filing period</td> <td>Jan.</td><td>Feb.</td><td>Mar.</td><td>Apr.</td><td>May</td><td>Jun.</td><td>Jul.</td><td>Aug.</td><td>Sep.</td><td>Oct.</td><td>Nov.</td><td>Dec.</td> </tr> <tr> <td>Filing deadline</td> <td colspan="12">Last day of the month</td> </tr> <tr> <td>Tax period</td> <td>Dec.</td><td>Jan.</td><td>Feb.</td><td>Mar.</td><td>Apr.</td><td>May</td><td>Jun.</td><td>Jul.</td><td>Ago.</td><td>Sep.</td><td>Oct.</td><td>Nov.</td> </tr> </table>	Filing period	Jan.	Feb.	Mar.	Apr.	May	Jun.	Jul.	Aug.	Sep.	Oct.	Nov.	Dec.	Filing deadline	Last day of the month												Tax period	Dec.	Jan.	Feb.	Mar.	Apr.	May	Jun.	Jul.	Ago.	Sep.	Oct.	Nov.
	Filing period	Jan.	Feb.	Mar.	Apr.	May	Jun.	Jul.	Aug.	Sep.	Oct.	Nov.	Dec.																														
Filing deadline	Last day of the month																																										
Tax period	Dec.	Jan.	Feb.	Mar.	Apr.	May	Jun.	Jul.	Ago.	Sep.	Oct.	Nov.																															
≤ 3,000,000	Quarterly filing	➤	<table border="1"> <tr> <td>Filing period</td> <td style="background-color: #d9ead3;">Apr.</td> <td style="background-color: #f4cccc;">Jul.</td> <td style="background-color: #d9ead3;">Oct.</td> <td style="background-color: #d9ead3;">Jan.</td> </tr> <tr> <td>Filing deadline</td> <td colspan="4">Last day of the month</td> </tr> <tr> <td>Tax period</td> <td>Jan. – Mar.</td> <td>Apr. – Jun.</td> <td>Jul. – Sep.</td> <td>Oct. – Dec.</td> </tr> </table>	Filing period	Apr.	Jul.	Oct.	Jan.	Filing deadline	Last day of the month				Tax period	Jan. – Mar.	Apr. – Jun.	Jul. – Sep.	Oct. – Dec.																									
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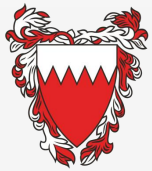
Taxpayers can apply to the NBT¹ for monthly VAT filing periods

1. National Bureau for Taxation

Note: Please refer to Article (48) of the Executive Regulations for further detail

SECTION #2

Different tax rates and policies for VAT



National Bureau for Taxation

What are the different tax rates and policies for VAT?

Goods and Services can be standard-rated, zero-rated, exempt or out of scope



National Bureau for Taxation

Summary of VAT rates

Executive Regulations – Article (2)

Type of VAT	Overview	Output Tax	Input Tax ¹ deductible?	Examples (non-exhaustive)
Standard-rated	5% VAT applied on goods and services	5%	Yes	<ul style="list-style-type: none"> • Telecommunications services • Clothing and apparel • Hotels and restaurants • Vehicles
Zero-rated	Supplies are taxable , but the VAT rate charged is 0%	0%	Yes	<ul style="list-style-type: none"> • Healthcare • Education • Basic food items
Exempt	Supplies on which no Tax is charged and for which associated Input Tax is not deducted	-	No	<ul style="list-style-type: none"> • Certain Financial Services • Sale and rent of Real Estate
Out of scope	Supplies which are kept out of the ambit of VAT	N.A.	N.A.	<ul style="list-style-type: none"> • Sovereign government activities (e.g. renewal of passport and visa services) • Grants where no goods / services are received in return

1. Tax borne by a Taxable Person in relation to Goods or Services supplied to him or imported for the purpose of carrying out the Economic Activity

Note: Please refer to Article (2) of the Executive Regulations for further detail

When is VAT due?

Taxes are typically due where final consumption occurs, at the earliest between delivery, valid tax invoice generation and payment, and apply on top of fully-loaded prices



Date of Tax Due on Supplies of Goods and Services


GCC Agreement – Article (23)

Place of Supply

Destination principle



- The place of Supply (where tax is ultimately levied) is the jurisdiction **where the final consumption occurs**
- This place does not necessarily have to be the country where value is created

Tax point (time)

Earliest of...		
 Delivery	 Invoice	 Payment

- VAT becomes **due at the earliest** of the following
- The date where goods are **delivered** or made available or performance of service is completed
 - The date when any **tax invoice** is issued in respect of the Supply
 - Partial or full **receipt of consideration**, to the extent of the amount received

Value of Supply

Price tag	
	Price includes all other taxes
	States VAT inclusive amount

- The value of the Supply includes all **other taxes** or charges in respect of that Supply (including **excise tax** and **customs duties**)
- Prices for goods and services supplied to consumers or in retail transactions must be stated as the **VAT inclusive amounts**

Note: Please refer to Article (23) of the Unified VAT Agreement for The Cooperation Council for the Arab States of the Gulf for further detail

Can paid VAT be deducted and refunded?

Input tax deductions apply in specific cases



VAT deductions and refunds

Executive Regulations – Articles (57), (58) and (86)



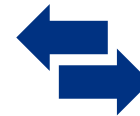
Input VAT deduction

Deduction on Tax Returns

- Deductible input VAT incurred by a Taxable Person during a taxable period is **deducted against the output VAT** collected on that person's taxable supplies for the same period

Limitation: non-economic activities

- **Hospitality and accommodation services** not provided in the course of business
- Events or trips for **recreational purposes**
- **Goods and Services used by employees** free of charge and for personal use, except where there is a legal obligation to provide such goods/services



Refunds of VAT

Taxable Persons

- If for a specific Tax Period the **deductible amount exceeds the payable amount**, a Taxable Person may **request a refund** from the **NBT**¹
- If no refund is requested, Taxpayers **can carry-forward the excess** to the subsequent Tax Period
- At any other time where a Taxable Person has made an **overpayment of VAT due**, or has a credit balance, the **Taxable Person may request a refund of overpaid VAT**

1. National Bureau for Taxation

Note: Please refer to Articles (57), (58) and (86) of the Executive Regulations for further detail

What goods are exempt and zero-rated?

For certain industries, goods and services are zero-rate or exempt



Zero-rated and exempt supplies

VAT Law – Articles (3) and (53)



VAT Law (Art. 3)
Tax Rate

Tax shall be applied at the standard rate of 5% of the value of the Supply or the value of Imports, unless this Law provides for an exemption or the zero-rate on such supplies.



Specifications

Rate	Type	Supply	
Zero-Rate	Basic needs	Basic food items	
	Education	Private education	
	Health		Private healthcare
			Medicine and medical equipment
	Oil and Gas	Domestic Oil and Gas	
	Transport		Domestic transportation
			International transportation
	Real Estate	Construction services for new buildings	
	Commodities		Precious stones
			Investment gold, silver, and platinum ¹
International Trade		Supplies to outside of the GCC	
		Supply to or within a customs duty suspension regime ²	
Exempt	Real Estate	Sale and rental of residential and commercial Real Estate	
	Financial Services	Financial Services (margin-based products such as loans are exempt and fee based products are standard rated)	

1. Supply or import of investment if it is not less than 99% pure and tradable on the Global Bullion Exchange; first Supply after extraction for commercial purposes

2. In accordance with unified Customs Law, and the Supply of such goods whilst under customs duty suspension

Note: Please refer to Articles (3) and (53) of the VAT Law for further detail

How is VAT applied to Financial Services?

Fee-based products are taxed at the standard rate while margin-based products (e.g., loans, deposits, etc.) are exempt



Application of VAT in the Financial Services sector

Executive Regulations – Article (81)

**“ Executive regulations (Art. 81)
Supply of Financial Services**

The **Supply of Financial Services shall be exempt from Tax, except** where the Consideration for the Service is expressly determined **as a fee, commission or commercial discount.**

”

Specifications (non-exhaustive)

Services exempt regardless of the form of **Consideration** include:

- Issue, allotment, or transfer of ownership of an equity security or debt security
- Life insurance and reinsurance contracts, and transferring ownership of them

Investment funds services are exempt from Tax where they relate to

- Issue of financial derivatives, or deferred contracts
- Issue of shares, stocks, bonds and equity securities

Islamic financial products which are provided under a written contract and relate to a Supply of financing shall be **treated as the equivalent non-Shari’ah products** if

- Their intended objective is similar
- Materially achieve the same result

How is VAT applied to Healthcare?

Private healthcare is generally zero-rated if provided by qualified practitioners or qualified medical institutions



Application of VAT in the Healthcare sector

Executive Regulations – Articles (69), (70) and (71)

Non-exhaustive

	A Healthcare services	B Associated goods and services	C Medicines and medical equipment
0%	<p>Provided by qualified medical practitioners or institutions</p> <ul style="list-style-type: none"> • General & specialist medical services (surgery) • Dental services • Diagnostic services and testing • Vaccinations • Treatment of mental illnesses • Nursing care 	<p>Provided to a patient during the course of the treatment</p> <ul style="list-style-type: none"> • Drugs, bandages etc. • Laboratory services • Transport, accommodation and catering services for patients 	<p>Listed in a decision issued by the competent Medical Authority</p> <ul style="list-style-type: none"> • To be defined by the Medical Authority of the Kingdom
5%	<ul style="list-style-type: none"> • Cosmetic procedures (unless provided as part of treating a medical condition) 	<ul style="list-style-type: none"> • Services provided to non-patients 	<ul style="list-style-type: none"> • N/A

Note: Please refer to Articles (69), (70) and (71) of the Executive Regulations for further detail

How is VAT applied to the construction of new buildings?

Goods and Services provided for the construction of new buildings are zero-rated, yet subject to certain conditions



Application of VAT in construction services for new buildings¹

Executive Regulations – Article (76)



Executive regulations (Art. 76) Construction of new buildings

The **zero-rate shall apply to the Supply of construction services in relation to new buildings** carried out by the Taxable Person. **Goods Supplied by a Person making a Supply of construction services**, in the course of providing construction Services for a new building, **shall also be zero-rated.**



Specifications (non-exhaustive)

Construction services in relation to new buildings

- **Zero-rate:** Construction works, site clearance services, a new extension to an existing building and services provided by engineers and surveyors
- **Standard rate:** Demolition of buildings on the land on which the new building is to be constructed, architects' and interior design fees as well as restoration works

Goods supplied as part of the construction services shall

- **Zero-rate²:** Building materials, equipment that is permanently affixed, goods to conduct civil engineering works and goods to obtain water and electricity
- **Standard rate:** Furniture that is not affixed to the building, goods supplied for landscaping purposes and decorations (e.g., paintings, artwork, carpets, etc.)

A Person who makes **Taxable Supplies subject to the zero-rate**, and **other activities subject to a different Tax treatment**, shall **apportion the contract price to determine the price of each of the parts** of the contract subject to a different treatment

The zero-rate shall not apply to Goods or Services supplied after the building has been completed

1. "Building" shall mean residential, commercial or industrial buildings, such as a dwelling, offices, factories, workshops, retail stores, multi-story car parks, power stations, oil refineries, liquefied natural gas stations or oil fields

2. Goods supplied as part of the construction services shall include those used, installed or incorporated into the building

Note: Please refer to Article (76) of the Executive Regulations for further detail

How is VAT applied to Imports?

Imports are subject to VAT, yet payment methods vary and exemptions apply in specific cases



Application of VAT in Imports

VAT Law – Article 51, Executive Regulations – Articles (21), (22), (65), (83), (84) and (85)

Payment of Tax at Import

- The Importer shall pay the Tax due on **import** to the **Customs Affairs at the Ministry of Interior** prior to their release from customs

Deferral of VAT on import

- **NBT¹ may allow the deferral of VAT on imports** upon meeting the following conditions:
 - Importer is registered for Tax purposes.
 - Taxable Person is registered with the Customs Affairs at the Ministry of Interior

General provisions for import of goods

- Goods shall **not be considered as imported** if they are under a **customs duty suspension regime** in accordance with the **Customs Law for the GCC**

Import exemptions

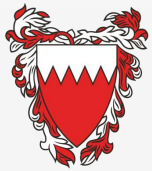
- **No import VAT will be charged** if the **Goods are exempt from Tax** or **subject to Tax at the zero-rate**
- **Import of goods exempt from customs duty**, in accordance with the conditions and controls stipulated in the **Customs Law for the Cooperation Council for the Arab States of the Gulf** include:
 - Imports of **personal baggage** brought by citizens residing abroad and foreigners arriving to reside in the Kingdom for the first time
 - Imports of **gifts** accompanying passengers
 - **Imports** of Goods **previously exported** outside of Bahrain
 - Goods imported by **military forces, internal security forces and security bodies** operating in the Kingdom
 - Goods under **diplomatic or consular arrangements**
 - Necessities and equipment used by persons with **special needs**

1. National Bureau for Taxation

Note: Please refer to Articles (21), (22), (65), (83), (84) and (85) of the Executive Regulations and Article (51) of the VAT Law for further detail

SECTION #3

Non-compliance



National Bureau for Taxation

What is considered an administrative offence?

Main offences include – but are not limited to – payment and registration delays, submission of false information and obstructing the Bureau from performing its duty



Administrative offences

VAT Law – Article (60)

Topic	Description of offence	Associated penalties
Submission & payment	<ul style="list-style-type: none">• Late submission of Tax Return and late payment of tax due, not exceeding 60 days from the end of the timeframe specified in the Law	<ul style="list-style-type: none">• 5%-25% of the respective Tax which should have been declared or paid
Registration	<ul style="list-style-type: none">• Failing to apply for registration within 60 days from the date of expiry of the registration period	<ul style="list-style-type: none">• Up to BHD 10,000
False submission	<ul style="list-style-type: none">• Submission of false information about Importation or Supply of Goods and Services if their value is higher than declared in the Tax Return	<ul style="list-style-type: none">• 2.5%-5% of the unpaid Tax for each month or part thereof which the tax was not paid
Other	<ul style="list-style-type: none">• Obstructing NBT¹ from performing their duties to monitor, inspect, investigate, review and request and access documents• Failing to notify the NBT of any changes to details or information included in the Registration application or Tax Return within the specified timeframes• Failing to display prices of Goods or Services inclusive of Tax• Failing to provide data or information requested by the NBT• Failing to comply with the conditions and procedures related to the issuance of the Tax Invoice• Violation of any other provision of the Law or Regulations	<ul style="list-style-type: none">• Up to BHD 5,000



Administrative offences can be subject to tax evasion penalties if performed deliberately to avoid payment

1. National Bureau for Taxation

Note: Please refer to Article (60) of the VAT Law for further detail

What is considered tax evasion?

Cases of not paying a true VAT liability – for which penalties will be imposed



Tax evasion

VAT Law – Articles (63) and (64)

...as such, penalties have been established to avoid related offences

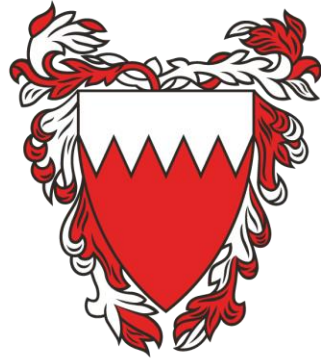
Protecting tax revenues against evasion activities is critical...

Measures have been put in place to guarantee

- **Tax system support** to the Government's **wider economic and social objectives**, including the provision of public services
- **Higher taxes are not charged on others**, as a result of pressure on public finances
- **Public confidence in the fairness and soundness of the tax system**

Topic	Description of offence	Associated penalties
Registration	<ul style="list-style-type: none"> • Failing to apply for registration within 60 days 	<ul style="list-style-type: none"> • Any person who commits any of the instances of Tax evasion shall be liable for: <ul style="list-style-type: none"> – Imprisonment between three and five years in addition to... – ... a fine not less than the same or up to three times the value of Tax Due • Penalties double where a second tax evasion offence is committed within 3 years <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> Reconciliation may apply if an amount equal to minimum penalty designated for the offense is paid </div>
Submission & payment	<ul style="list-style-type: none"> • Failing to submit Tax Returns or pay Tax due on Imports or supplies of Taxable Goods or Services within 60 days 	
Deduction	<ul style="list-style-type: none"> • Deducting Input Tax and adjusting the due tax wrongfully, violating the Input Tax deduction rules 	
Recovery	<ul style="list-style-type: none"> • Recovery of all or part of the Tax wrongfully and knowingly 	
False documents	<ul style="list-style-type: none"> • Provision of false documents deliberately to evade the payment of all of part of the Tax due 	
Tax invoices	<ul style="list-style-type: none"> • Failing to issue Tax Invoices for Taxable Supplies or Imports of Goods or Services where required to do so • Issuance of Tax Invoices including Tax related to non-Taxable Supplies 	
Records and books	<ul style="list-style-type: none"> • Failing to maintain records related to Imports or Supplies of Goods or Services, in an orderly manner 	

Note: Please refer to Articles (63) and (64) of the VAT Law for further detail



National Bureau for Taxation