

Veri*Factu and Electronic Invoicing

What is Veri*Factu?

The term **VERI*FACTU** is a colloquial way of referring to the regulation that establishes the requirements that must be adopted by Electronic Invoicing Systems (SIF) used by entrepreneurs and professionals, and the standardization of invoicing record formats.

This system has been promoted by the Spanish Tax Agency with the objective of guaranteeing the integrity, traceability, conservation, accessibility, readability, and immutability of issued invoices.

It is based on **Royal Decree 1007/2023**, which defines the technical requirements for Invoicing Software Systems (SIF), and modified by **Royal Decree 254/2025**, which adjusts the implementation deadlines.

What is an electronic invoice?

Electronic invoices are issued, transmitted, and received in a structured format. They must be accompanied by an advanced or recognized electronic signature, or an electronic data interchange system that guarantees authenticity and integrity.

This obligation is regulated under Law 18/2022 on business creation and growth (known as the 'Create and Grow Law'), published in the Official State Gazette (BOE) on September 29, 2022. The obligation to issue electronic invoices between companies and self-employed persons (B2B) is pending further **regulatory development** that will determine technical requirements and deadlines.

Expected deadlines once the regulation is approved:

- Companies with annual turnover > €8 million: 1 year from approval of the regulation to adapt.
- Other companies and self-employed (< €8 million): 2 years from entry into force of the regulation.

Comparison between Veri*Factu and Electronic Invoicing

	<i>Veri*Factu</i>	<i>Electronic Invoice</i>
Scope of application	Applies to all users issuing invoices with billing software, except Basque Country and Navarre.	Applies only to B2B operations within Spain.
Transactions	Covers all invoices issued through billing software regardless of customer type.	Apply only to B2B transactions.
Obligations	Requires certified software and immutable records.	Requires mandatory submission to the Spanish Tax Agency (AEAT).
Formats	Allows paper or PDF with QR codes.	Requires XML format transformation.
Entry into force	Companies from 01/01/2026, self-employed from 01/07/2026	Pending publication of regulatory development in the BOE.

(*) These are two separate obligations.

Who is affected by Veri*Factu?

1. **Producers and marketers** of billing software (SIF).
2. **Entrepreneurs/professionals** established in Spain who issue invoices, provided they meet the following '4 NO' rule:

Do NOT invoice exclusively manually (must use billing software).

Do NOT belong to the SII system.

Do NOT have tax domicile in the Basque Country or Navarre.

Do NOT hold an exemption resolution from RRSIF compliance.

Practical Example:

A small company (SME) in Madrid using Sage software to issue invoices

 **Affected.**

A multinational company under the SII system

 **Not affected**

A self-employed individual issuing about 10 invoices per year in Word or Excel without billing software

 **Not affected**

Types of compliance

Two types of compliance are established under Royal Decree 1007/2023:

Veri*Factu Method

Requires immediate submission of invoice records to the Tax Agency's electronic office. Invoices include a QR code and can be verified online by clients.

Non-Veri*Factu Method

Does not require immediate submission, but imposes stricter security requirements, including electronic signatures and mandatory 'Event Logs'. Invoices also carry QR codes but cannot be verified online.

Comparison between Veri*Factu and Non-Veri*Factu

	Veri*Factu	No Veri*Factu
Submission of records	Automatic submission of invoicing records to AEAT at the moment the invoice is issued.	Records are not automatically submitted. They are stored locally and only sent to AEAT upon request.
Legal validity of the system	Requires certified invoicing software with Veri*Factu submission enabled.	Certified software without immediate submission. Meets technical requirements but not full automation.
Invoices	Invoices must include the phrase: "Invoice verifiable at the AEAT electronic office" or "VERI*FACTU" plus a QR code.	Invoices also generate QR codes and records, but they do not include the Veri*Factu message nor automatic verification.
Registro de eventos	Not required.	Mandatory.
Firma electrónica	Not required.	Mandatory.

What does the Event Log consist of?

At least the following event records must be kept:

- Start of operation of the IT system as "NON-VERIFACTU"*.
- End of operation of the IT system as "NON-VERIFACTU"*.
- Launch of the anomaly detection process in invoicing records.
- Detection of anomalies in the integrity, immutability, and traceability of invoicing records.
- Detection of anomalies in the integrity, immutability, and traceability of event records.
- Restoration of a backup copy, when managed directly by the invoicing IT system.
- Export of invoicing records generated during a given period.
- Export of event records generated during a given period.

In addition to the above, there is an **event summary record**, which consolidates all events that occurred during a given period (either since the previous summary record was generated, or since the start of the system's operation if no previous summary exists). **This summary record must be saved every 6 hours the SIF is operational and available for use, as well as before shutting down or turning off the system.**

Finally, the producer (manufacturer) of the SIF may also voluntarily record other events considered relevant.

Entry into force of Veri*Factu	Corporate Tax taxpayers.	01/01/2026
	Personal Income Tax taxpayers (economic activities).	01/07/2026
	Non-Resident Income Tax via permanent establishment.	01/07/2026

Penalties for Non-Compliance	<p>Article 201 bis of Law 58/2003, of December 17, the General Tax Law (LGT), provides for two types of penalties, both classified as serious:</p> <ul style="list-style-type: none">Manufacture, production, and commercialization of IT systems that do not comply with the provisions of Article 29.2.j) of the LGT and its implementing regulations (royal decree, ministerial order, and related documentation published on the Tax Agency's electronic office). <p>The stipulated penalty is €150,000 per fiscal year in which sales of such non-compliant systems occur, and per each different type of system involved in the infringement.</p> <p>Additionally, when such IT systems are not certified despite being legally required, a fine of €1,000 per uncertified system sold will be imposed.</p> <ul style="list-style-type: none">Possession of IT systems that do not comply with the provisions of Article 29.2.j) of the LGT, when they are not duly certified and certification is required under current regulations, or when certified devices have been altered or modified. The penalty in this case is €50,000 per fiscal year.
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Alternatives to Veri*Factu		Veri*Factu	Immediate Supply of Information (SII)
	Obligation	Mandatory from 2026 for entrepreneurs and professionals using invoicing software (SIF).	Mandatory for large companies, REGE, and REDEME. Voluntary for the rest.
	Duration	Calendar year.	Calendar year.
	Inclusion and withdrawal	First invoice submission.	Through Form 036, effective from the day after the settlement period in which the option was exercised. Withdrawal must be filed in November of the previous year.
	Scope	Complete and secure registration of issued invoices (hash, QR code, signature, event logs).	Structured VAT data: issued and received invoices, investment goods, intra-community operations.
	Technical means	Certified software with QR generation, chained hash, event log, and possibility of automatic submission.	Data sent via standard XML files to AEAT; does not affect invoice content.
	Implications of use	Preventive control; ensures security from the origin of the invoice; strengthens reputation with clients.	Improves tax and accounting management; reduces formal obligations (Forms 347 and 390).



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Seegman refers to the company Seegman Servicios Jurídicos, S.L.P., with tax identification number B88144852.

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