



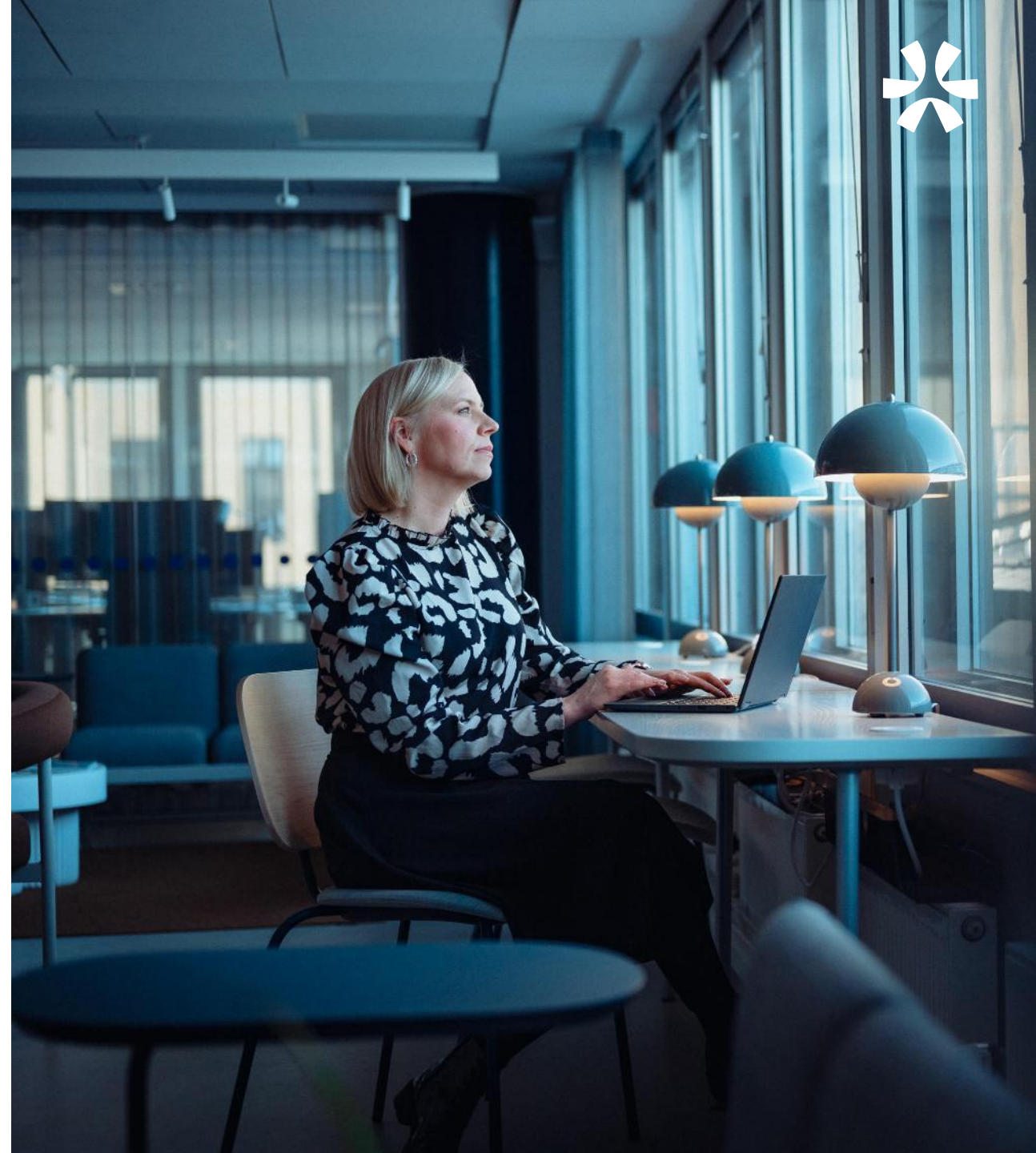
VAT in the Digital Age

Pillar III and its practical implications

October 23rd, 2025

A few practical matters to start with

- Participants' cameras and microphones will be turned off during the presentation
- Questions and comments can be sent via the chat during the webinar.
- Materials from the webinars will be made available on our website. You can also find our upcoming events there: www.svalneratlas.com/fi/tapahtumat



Today's speakers: our VAT specialists



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Svalner Atlas is the leading independent tax and transaction advisory firm in the Nordics and Benelux.

With 400 professionals, we deliver expert, cross-border advice that helps clients navigate complexity with confidence.

Svalner Atlas was formed in 2024 through the merger of top-tier firms in Sweden, Finland, and the Netherlands. In 2025, we expanded into Norway and Denmark and united all operations under the Svalner Atlas brand.

We advise across all areas of tax, transactions, ESG, valuation, accounting and legal, serving multinational companies, private equity firms, family businesses and private clients



5

countries

7

offices

400

professionals



1. Introduction and welcome
2. ViDA package
3. Pillar III
 - Extension of OSS for B2C and to zero-rated supplies
 - Extension of reverse charge
 - Special scheme for transfers of own goods
4. Practical examples of Pillar III



Pillar 1

Digital Reporting Requirements

- Mandatory e-invoicing
- Harmonized e-invoice format
- Real time digital reporting
- Replacing ESL

Pillar 2

Platform Economy

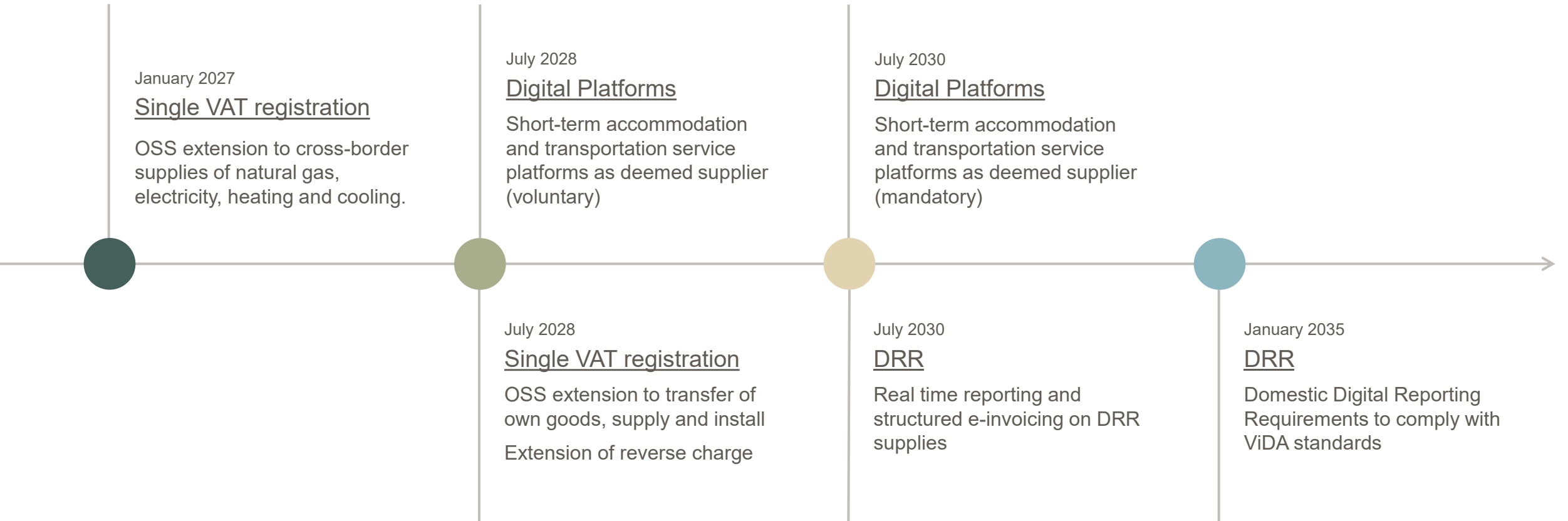
- Place of supply rules
- Deemed supplier regime for short-term accommodation, passenger transport

Pillar 3

Single VAT Registration

- Expanded One Stop Shop
- Expanded reverse charge
- Replacing call-off stock simplification

ViDA timeline





ViDA Pillar III



Pillar III

Extension of OSS

Now

- Union One-stop shop scheme (OSS)
 - Taxable person may remain identified for VAT only in one Member State (country of identification) and settle transactions that are subject to VAT in other MS through one identification.
- OSS covered transactions currently:
 - Intra-Community distance sale of goods.
 - B2C supply of services.
 - Platforms treated as deemed suppliers.
- January 1, 2027 onwards B2C supplies of gas, electricity, heat energy, or cooling energy is considered as distance sale of goods.

July 1, 2028

- OSS covered transactions going forward:
 - Supply of goods B2C in accordance with Art. 36, 37, 39.
 - Supply of goods B2C without dispatch or transport Art. 31.
 - Transfer of goods to another Member State Art. 18.
 - Private use of goods or services in accordance with Art. 16, 26.
 - Zero-rated and exempted supplies with the right to deduct in accordance with (Art. 148, 151).
 - Will not apply to exempted supplies without the right to deduct (e.g. healthcare, education etc.)



Pillar III

Other changes relating to OSS

- Corrective OSS declarations
- Threshold of k€10
 - Relating to place of supply of distance sales of goods and supplies of telecommunication, broadcasting and electronic services
 - Taxpayers opt in for taxation in the country of consumers when register for OSS
- Non-Union OSS for B2C services regardless of buyer's residence



- Extension of OSS

**Supply of Goods B2C with
installation in another MS
(Art. 36)**

A Finnish manufacturer of components
sells directly to consumers with
installation in Germany and Austria via
its own website. The goods are shipped
from a central warehouse in Finland.



- Extension of OSS

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**Supply of Goods B2C in another MS
without dispatch or transport
(Art 31.)**

The same Finnish company operates a showroom in Spain (e.g. Expo). Consumer visits the location and purchases goods directly on-site. No separate delivery or installation involved.



Pillar III

Extension of reverse charge

Now

- Mandatory reverse charge only for B2B services under the main rule (Art. 44)
- In other cases, member states are free to choose whether reverse charge is applicable

1 July 2028

- Where the seller is not identified and not established in the country of supply, and the buyer is identified there, buyer is liable for VAT under reverse charge
- Member states may decide that the buyer is liable for VAT, whether the buyer is established in the country of supply, when the supplier is not established in the country of supply
- Mandatory reverse charge will not apply to supplies subject to the margin scheme



Extension of reverse charge

Now vs. 1 July 2028

A Oy sells goods with
installation to B GmbH



Extension of reverse charge

Now vs. 1 July 2028

A Oy sells goods with installation to B GmbH

Now vs. 1 July 2028

A Oy buys goods from B GmbH with the goods located in Germany.

A Oy re-sells the goods to C GmbH and the goods remain in Germany.

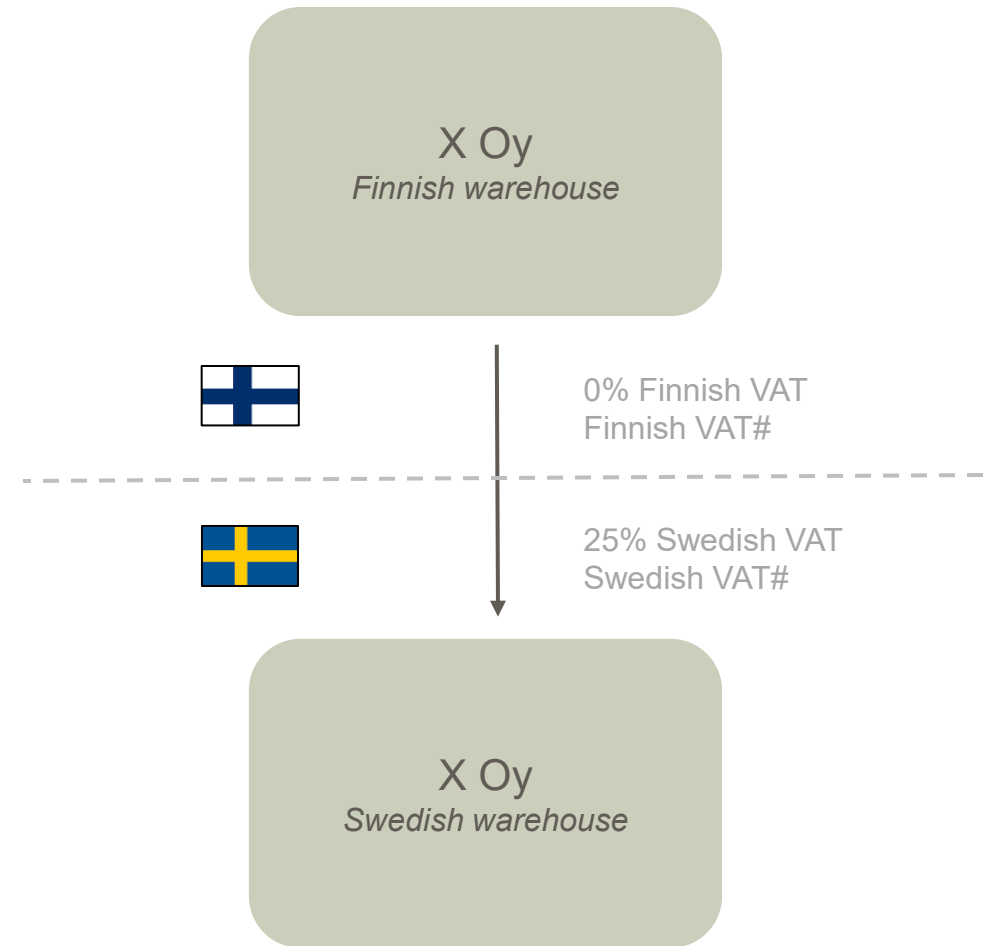


Pillar III

Special scheme for transfers of own goods

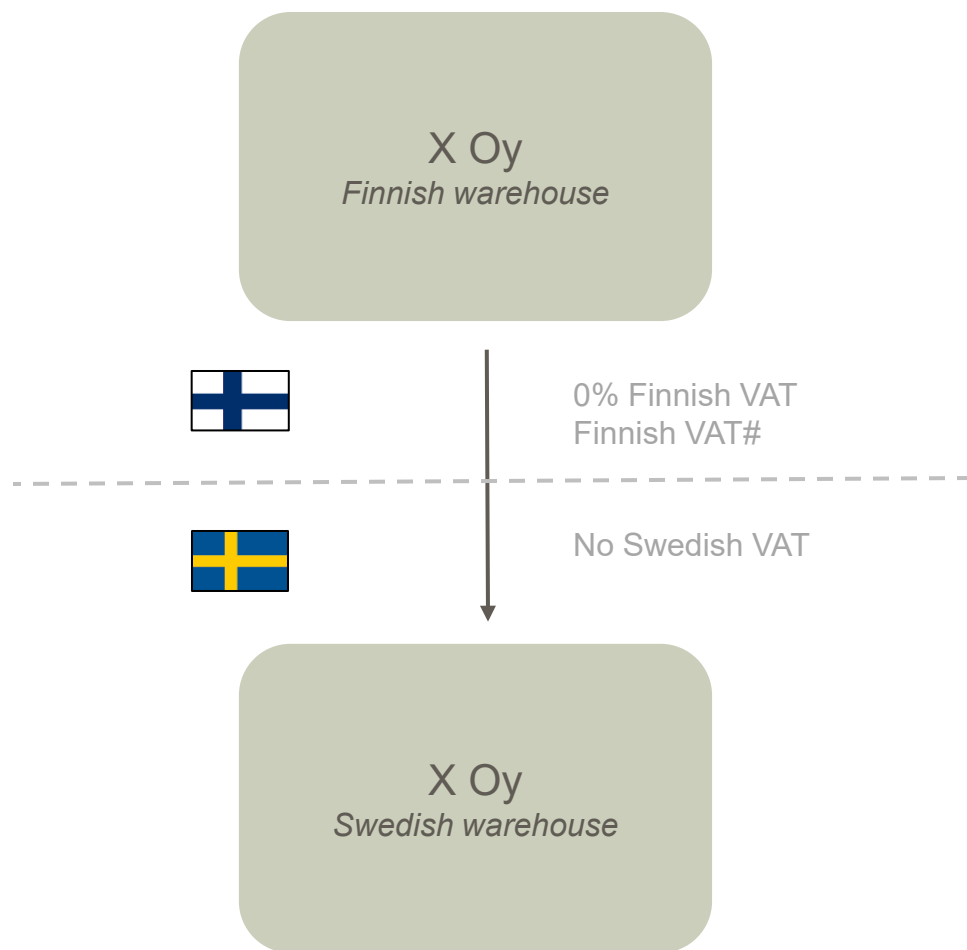
Current regulations

- Intracommunity transfer of own goods: *Dispatch or transport of movable tangible property by or on behalf of the taxable person, for the purposes of his business, to a destination outside the territory of the Member State in which the property is located, but within the EU*
- Constitutes fictitious intracommunity supply and acquisition.
- Registration and reporting obligations in both Member State of dispatch as well as Member State of arrival:
 - Report intracommunity supply in Member State of dispatch. Subject to 0% local VAT.
 - Report intracommunity acquisition in Member State of arrival. Subject to local VAT, should be remitted.





Special scheme for transfers of own goods



New regulations (as of July 2028)

- Still constitutes fictitious intracommunity supply and acquisition. However: acquisition = exempt.
- Registration and reporting only needed in Member State of dispatch/ where taxable person is registered already: OSS scheme.
- All or nothing: application is optional.
 - Should you choose to apply, it applies to ALL transfers of own goods.
 - Should you choose to not apply, it applies to NONE of the transfers of own goods.
- Goods for which no full right to recover input VAT are excluded.
- Monthly reporting obligation – appropriate records need to be kept.
- Pitfalls: no right to recover input VAT via OSS & what if goods are supplied to other MS after transfer?



Practical examples of Pillar III



Practical examples of Pillar III

Warehouses & B2B supplies of goods

Scenario 1

- A Oy moves goods from Finland to its warehouse in the Netherlands.
- The goods are stored in the warehouse until sold to a Dutch entity. The goods remain in the Netherlands.



Practical examples of Pillar III

Warehouses & B2B supplies of goods

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Scenario 2

- A Oy moves goods from Finland to its warehouse in the Netherlands.
- The goods are stored in the warehouse until sold to a Belgian entity. The goods are delivered by A Oy to Belgium.



Practical examples of Pillar III

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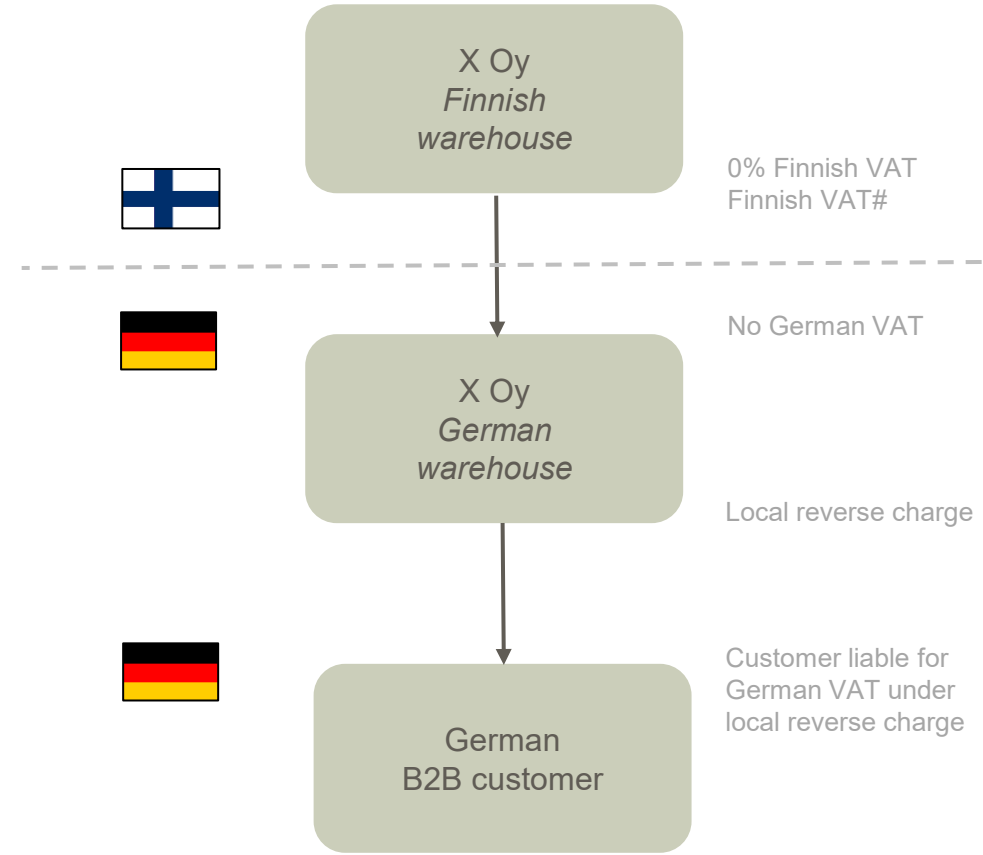
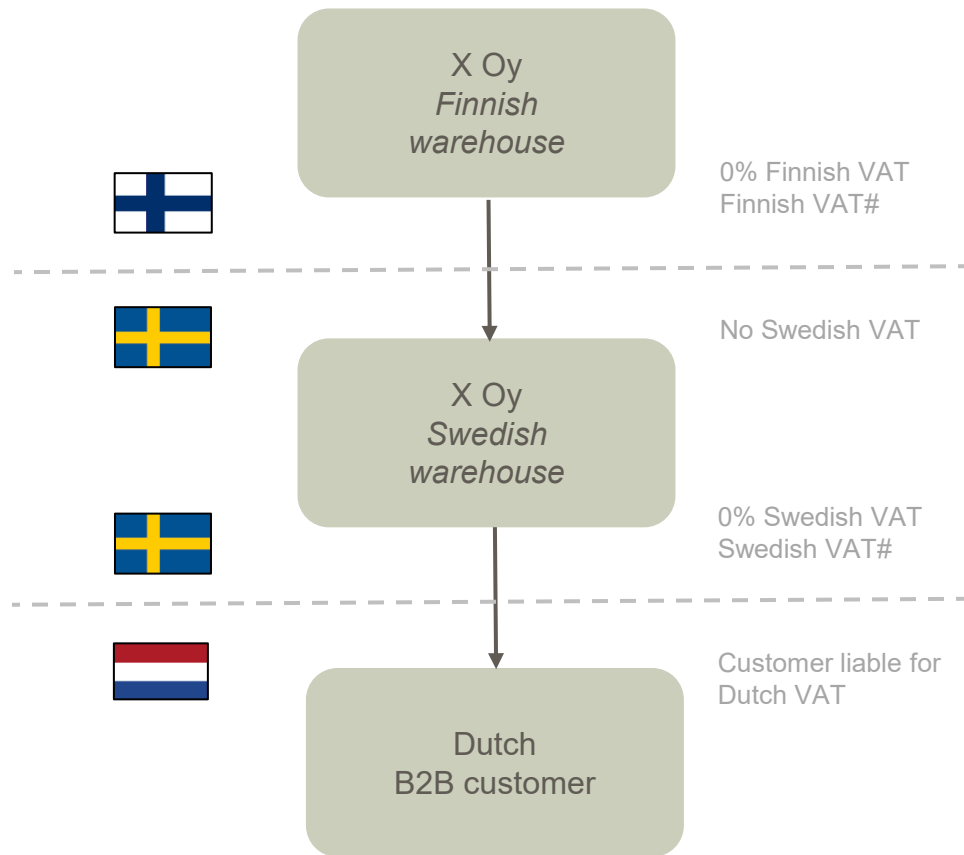
Scenario 3

- A Oy moves goods from Finland to its warehouse in the Netherlands.
- The goods are stored in the warehouse until sold to a Belgian entity with no VAT registration or FE in the Netherlands. The goods remain in the Netherlands.



Practical examples of Pillar III

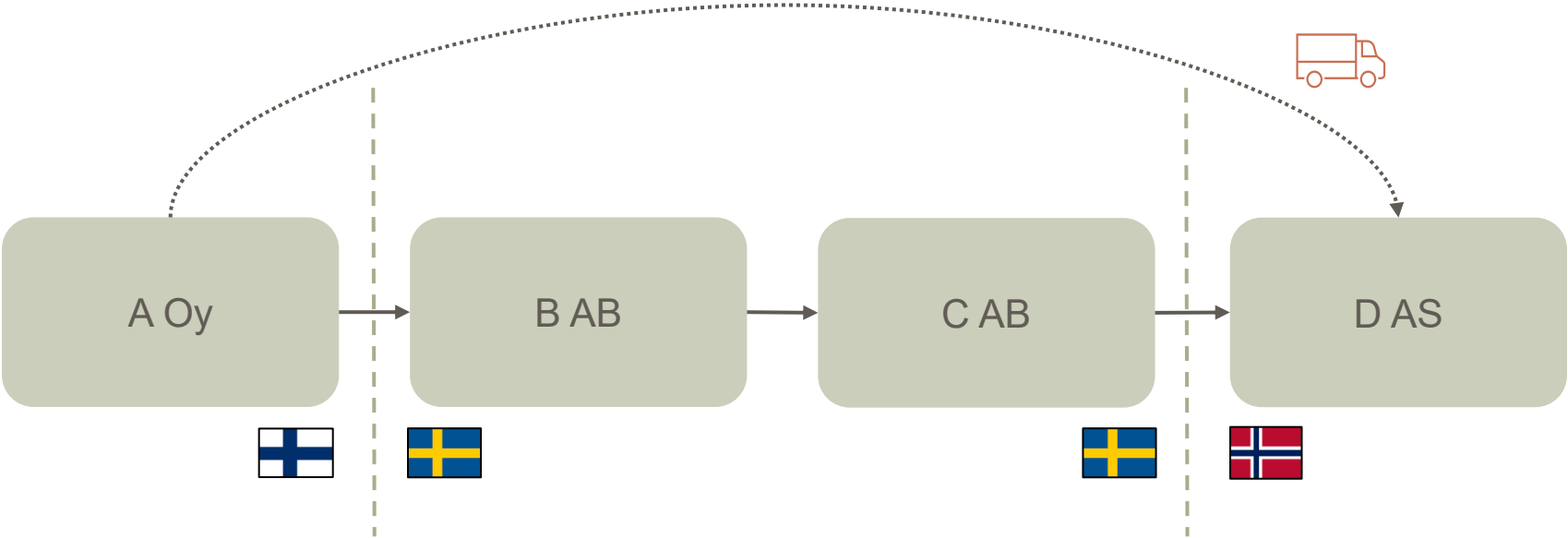
Transfer of own goods & subsequent supply





Practical examples of Pillar III

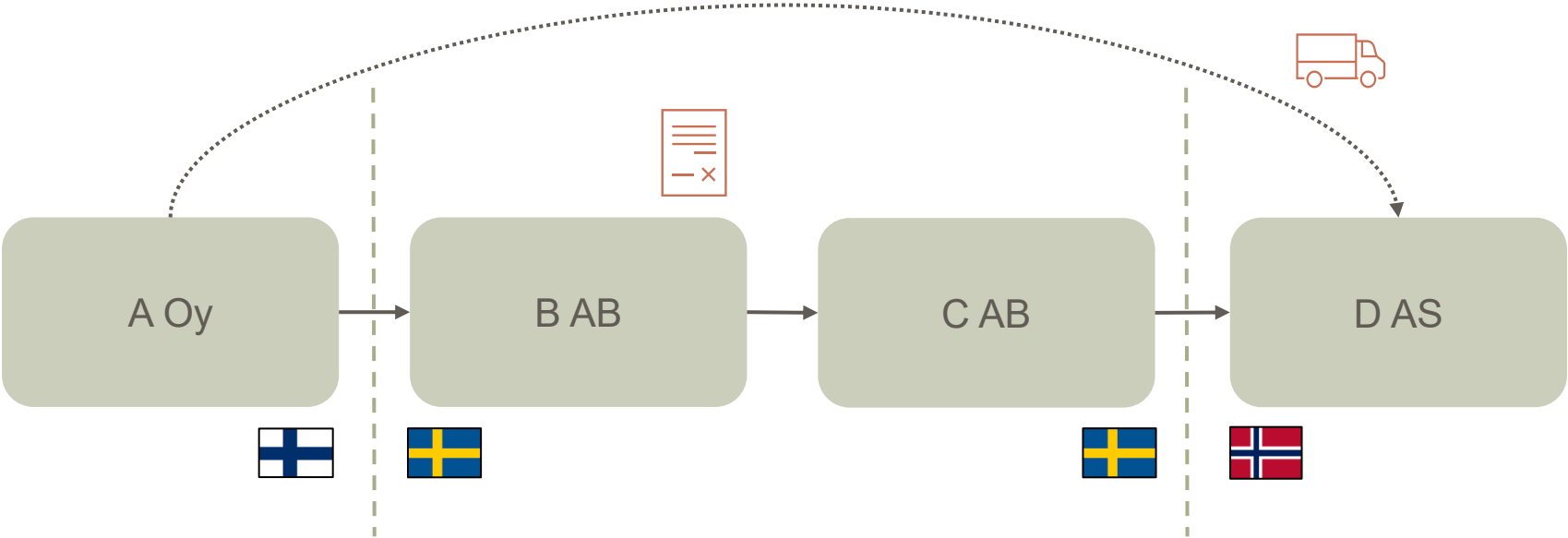
Chain transactions





Practical examples of Pillar III

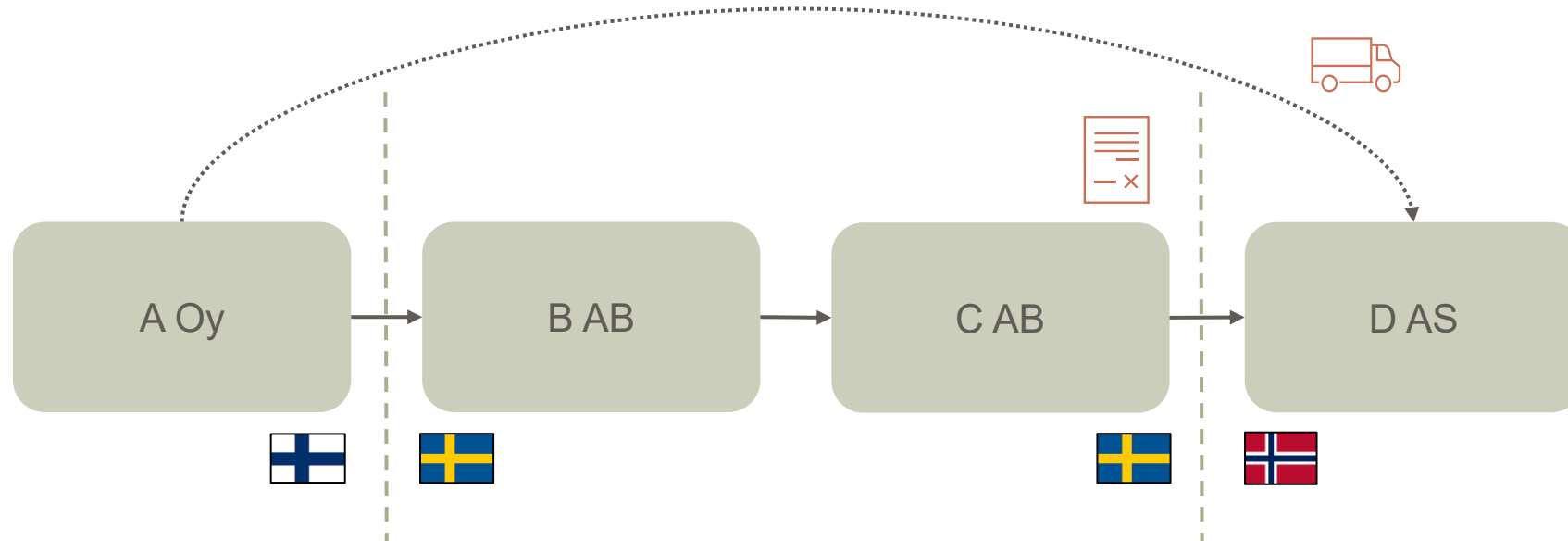
Chain transactions





Practical examples of Pillar III

Chain transactions



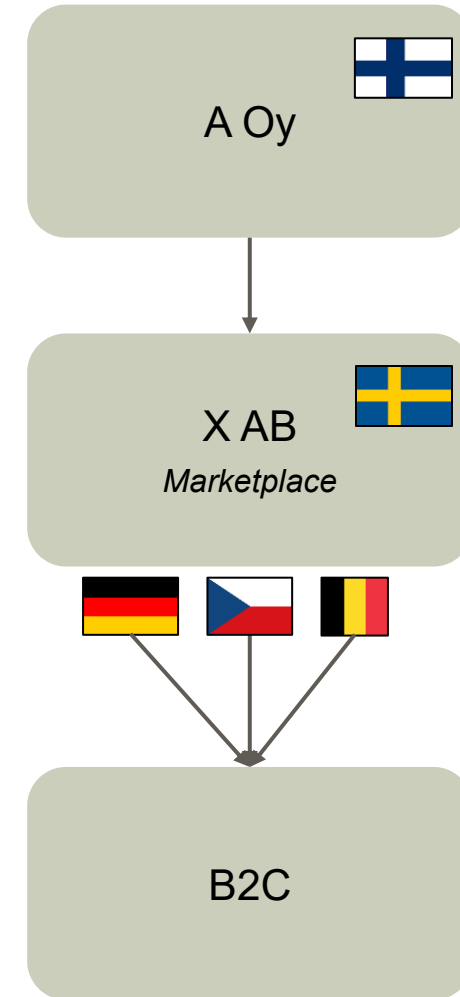


Practical examples of Pillar III

B2C via online marketplace

Scenario

- A Oy, a Finnish-based clothing brand, markets and sells its goods via X AB, a Swedish-based e-commerce marketplace.
- X AB operates warehouses in Germany, Czech Republic, and Belgium. A Oy sends goods to X AB's warehouses.
- Goods owned by A Oy are stored in these warehouses and sold to consumers located in those MS as well as other MS.
- A Oy retains ownership of the goods until the point of sale to the consumer.
- X AB decide to transfer goods between its warehouses to balance inventory levels.





Practical examples of Pillar III

Installation supply | Scenario 1

- A Oy supplies a machinery line with installation, installation supervision, commissioning and testing to a buyer B GmbH in Germany.
- The equipment for the machinery line is procured to A Oy's home country Finland and then delivered to the site in Germany.
- A Oy's employees take care of the installation, supervision, commissioning and testing. A Oy's employees stay in Germany for approximately three months.



Practical examples of Pillar III

Installation supply | Scenario 2

- Some of the equipment for the machinery line is procured from E AS. The equipment is delivered within Germany. Some of the equipment is delivered from China and imported in Germany.
- A Oy's employees total stay in Germany is some 15 months.
- A Oy subcontracts installation services from C Sp.z.o.o.
- A Oy rents lifting equipment with an operator from D GmbH.



Q&A



Upcoming webinars

Start up – Valmistaudu rahoituskierrrokseen ja vältä sudenkuopat

Webinaari 30.10.2025 klo 8:30

Tilinpäätöksen verosuunnittelu

Webinaari 11.11.2025 klo 10:00

Perheen sisäiset lahjoitukset – käytännön vinkkejä ja näkökulmia

Webinaari 20.11.2025 klo 10:00

Avainhenkilöiden sitouttaminen kasvuyhtiössä

Webinaari 27.11.2025 klo 8:30

Tullit ja verotus – Miten huomioida kansainvälisen kaupan uusi toimintaympäristö siirtohinnoittelumallin suunnittelussa?

Webinaari 11.12.2025 klo 8:30

Thank you!

