FATOORA Phase 2 readiness kit

A working checklist for Saudi e-invoicing: the onboarding steps, the fields standard and simplified invoices must carry, QR and XML basics, the wave thresholds and the penalty schedule. Tick each line and keep the evidence.

Start here: Phase 1 (generation) has applied to all resident VAT-registered persons since 4 December 2021. Phase 2 (integration) began on 1 January 2023 and applies wave by wave. Wave 25, the latest announced, covers VAT-subject revenue above SAR 187,500 in any of 2022–2025, with integration by 1 February 2027. Check your own wave with the free **"Am I in a Phase 2 wave?"** checker that comes with this kit.

01 Phase 2 onboarding steps

	Check	Source
☐	**Confirm scope.** You are a resident VAT-registered person (or issue invoices on a supplier's behalf). Non-resident taxable persons are excluded. Fully exempt supplies, reverse-charge supplies and imports of goods are outside e-invoicing.	E-Invoicing Regulation Art 3; Implementation Resolution First 5–7
☐	**Find your wave and date.** Test VAT-subject revenue for *each* listed reference year against the wave threshold (see the wave table and the free checker). Keep ZATCA's notification to your legal entity; it is sent at least six months before your integration date.	Resolution Sixth; ZATCA wave announcements
☐	**Inventory every invoicing channel.** ERP, POS, e-commerce, billing, self-billing and third-party issuers, and for each: invoice types issued (standard, simplified, credit/debit notes).	Dariba Phase 2 guide; Technical Guideline §3.5
☐	**Map the EGS architecture.** Decide where documents are generated, signed and sent (central server, smart POS, branch servers, non-signing terminals). This sets how many units need a CSID; it is not one per screen.	Detailed Technical Guideline §3.5.1–3.5.4
☐	**Select and test a compliant solution.** ZATCA's solution-provider list is indicative and is not an approval; get evidence that your deployed version meets Phase 2 (XML, UUID, counter, hash chain, QR, stamping, APIs). Use the SDK/sandbox to test.	Solution Providers Directory; Technical Guideline §2.1.4–2.1.5
☐	**Clean master data.** Seller legal name, VAT number, CR and address; buyer VAT numbers and national address for B2B customers; product/tax-category codes and exemption reasons.	Resolution Annex 2; Invoicing Guideline v3 §4.2.3
☐	**Get the OTP from the FATOORA portal.** Log in with the taxpayer's ERAD credentials and generate an OTP for each EGS unit to onboard.	ZATCA FATOORA portal user manual; Technical Guideline §3
☐	**Generate the CSR and obtain the compliance CSID.** The EGS unit creates its key pair and CSR, then submits it with the OTP.	Technical Guideline §3
☐	**Pass the compliance checks.** Submit the required sample documents for each document type the unit will issue (standard and/or simplified invoices, credit and debit notes).	Technical Guideline §3
☐	**Obtain the production CSID** and switch the unit to production. Record each unit, certificate expiry and owner; plan renewal and revocation.	Technical Guideline §3, §4.2
☐	**Go live and monitor responses.** Clearance for standard documents before sharing with the buyer; reporting of simplified documents within 24 hours. Treat 'accepted with warnings' as a fix-forward item, and rejections as a new corrected document.	Resolution Second(3)(a)–(b); Technical Guideline §4.3
☐	**Set up incident handling.** Notify ZATCA through its specified channel of any failure that stops generation or integration, notify recovery, then clear/report the backlog.	Implementation controls Seventh(5)
☐	**Keep the archive.** Retain the XML (and any PDF/A-3 copy) and responses, accessible for the VAT record-retention period, in Saudi Arabia where required.	E-Invoicing Regulation; VAT Law/IR record rules

02 Required invoice fields: standard vs simplified

Standard tax invoices are for B2B and B2G supplies (Art 53(1)); simplified invoices are for consumers and qualifying supplies below SAR 1,000 (Art 53(1)(c), 53(7)). Credit and debit notes follow the original invoice type and must clearly reference the original invoice(s) and the reason (Art 54(4)), and be issued by the 15th of the month after the event (Art 54(6)).

Standard tax invoice (Art 53(5))	Simplified tax invoice (Art 53(8))	Source
☐ Title: "Tax Invoice" / «فاتورة ضريبية»	☐ Title: "Simplified Tax Invoice" / «فاتورة ضريبية مبسطة»	VAT IR Guideline v3 §4.2–4.3
☐ Issue date (and, electronically, issue time)	☐ Issue date (and time)	VAT IR 53(5)(a); 53(8)
☐ Sequential number that uniquely identifies the invoice	☐ Required invoice number in the e-invoicing data (Art 53(8)'s short list omits it, but electronic rules require it)	VAT IR 53(5)(b); Annex 2
☐ Supplier name, address and VAT registration number	☐ Supplier name, address and VAT registration number	VAT IR 53(5)(c),(e); 53(8)
☐ Customer name and address; customer VAT number (or other ID if unregistered) for B2B	☐ Not required (customer details may be added; required for the 53(7)(c)–(d) routes)	VAT IR 53(5)(d)–(e); Guideline §4.2.3
☐ Nature and quantity of goods, or nature and scope of services	☐ Goods or services supplied	VAT IR 53(5)(f); 53(8)
☐ Date of supply if different from issue date	☐ —	VAT IR 53(5)(g)
☐ Taxable amount per rate/exemption, unit price excl. VAT, discounts not already in the price	☐ Total consideration payable	VAT IR 53(5)(h); 53(8)
☐ VAT rate applied	☐ VAT due, or a statement that the price includes VAT at 15%	VAT IR 53(5)(i); 53(8)
☐ VAT amount payable in SAR	☐ VAT amount (SAR)	VAT IR 53(5)(j); 53(8)
☐ Reason where VAT is not charged at the standard rate (zero-rate/exemption)	☐ Same where applicable	VAT IR 53(5)(k)
☐ Reference to the profit-margin scheme where used	☐ —	VAT IR 53(5)(l)
☐ Arabic text required (other languages may be added)	☐ Arabic text required	VAT IR 53(5); Guideline §4.2.1
☐ Phase 2: UBL 2.1 XML, UUID, invoice counter, previous-invoice hash; ZATCA clearance stamp and QR returned on clearance	☐ Phase 2: UBL 2.1 XML, UUID, counter, hash chain; solution's cryptographic stamp and QR (tags 1–9); report within 24 h	VAT IR Resolution Annex 1–2; Technical Guideline §6

03 Clearance vs reporting

	Standard (B2B/B2G)	Simplified (B2C)
Route	Clearance by FATOORA **before** sharing with the buyer	Reporting within **24 hours** of generation
Stamp	ZATCA stamp applied on clearance	Your solution's stamp before reporting
Format	XML (UBL 2.1) submitted by API; PDF/A-3 with embedded XML is an optional customer copy	
Chain	UUID, invoice counter and previous-document hash on every document	

04 QR code contents (Phase 2)

Tag	Content	When
1–5	Seller name, seller VAT number, invoice timestamp, invoice total incl. VAT, VAT total	Phase 1 simplified invoices and notes already carry these five
6	Hash of the invoice XML	Phase 2
7	ECDSA signature	Phase 2
8	ECDSA public key	Phase 2
9	For simplified invoices and their notes: ZATCA technical CA's signature of the stamp public key	Phase 2, simplified only

Source: ZATCA Detailed Technical Guideline §6 (QR field definitions); Resolution Annex 1.

05 Penalties for e-invoicing violations

The first detected violation in each category gets a warning and a correction period. Fines (SAR) then rise with each repeat; a repeat more than 12 months later starts again with a warning.

Category (VAT violations classification guide, 2nd ed., May 2024)	2nd → 3rd → 4th → 5th → 6th and later occurrence (SAR)	Correction interval
Item 8 · Not connecting all relevant systems from your integration date (unless caused by a ZATCA system fault)	**10,000 → 15,000 → 20,000 → 30,000 → 40,000 → 50,000**	30 days
Items 9–12 · Not sharing/issuing as required, prohibited functions, deleting or altering after issue	**5,000 → 10,000 → 15,000 → 20,000 → 30,000 → 40,000**	30 days
Items 13–18 · Retention, incident notification, QR code, data fields, sharing with customer and other requirements	**1,000 → 5,000 → 10,000 → 20,000 → 30,000 → 40,000**	60 days

Fines waiver does not help here. ZATCA's current fines-exemption initiative (Ministerial Resolution 1117; ends **31 December 2026**) expressly excludes fines under VAT Law Article 45, which is where e-invoicing fines sit. Fix integration gaps rather than counting on relief.

06 Phase 2 waves: thresholds and dates

A wave covers taxpayers whose revenue subject to VAT **exceeded** the threshold in **any** of the listed years. One qualifying year is enough; a later fall in revenue does not undo it. ZATCA's notification to your entity is what fixes your date. Waves 1–16 were announced as integration *from* a date (ZATCA's roll-out table gives each group a window); waves 17 onward as *by* a date.

Wave	VAT-subject revenue	In any of	Integrate	Announced	
1	> SAR 3 bn	2021	from 1 January 2023	24 June 2022	
2	> SAR 500 m	2021	from 1 July 2023	23 December 2022	
3	> SAR 250 m	2021, 2022	from 1 October 2023	24 March 2023	
4	> SAR 150 m	2021, 2022	from 1 November 2023	28 April 2023	
5	> SAR 100 m	2021, 2022	from 1 December 2023	26 May 2023	
6	> SAR 70 m	2021, 2022	from 1 January 2024	16 June 2023	
7	> SAR 50 m	2021, 2022	from 1 February 2024	28 July 2023	
8	> SAR 40 m	2021, 2022	from 1 March 2024	18 August 2023	
9	> SAR 30 m	2021, 2022	from 1 June 2024	17 November 2023	
10	> SAR 25 m	2022, 2023	from 1 October 2024	29 March 2024	
11	> SAR 15 m	2022, 2023	from 1 November 2024	26 April 2024	
12	> SAR 10 m	2022, 2023	from 1 December 2024	24 May 2024	
13	> SAR 7 m	2022, 2023	from 1 January 2025	28 June 2024	
14	> SAR 5 m	2022, 2023	from 1 February 2025	26 July 2024	VERIFY
15	> SAR 4 m	2022, 2023	from 1 March 2025	30 August 2024	VERIFY
16	> SAR 3 m	2022, 2023	from 1 April 2025	27 September 2024	
17	> SAR 2.5 m	2022, 2023	by 31 July 2025	1 November 2024	VERIFY
18	> SAR 2 m	2022, 2023	by 31 August 2025	29 November 2024	VERIFY
19	> SAR 1.75 m	2022, 2023	by 30 September 2025	27 December 2024	VERIFY
20	> SAR 1.5 m	2022, 2023	by 31 October 2025	31 January 2025	
21	> SAR 1.25 m	2022, 2023, 2024	by 30 November 2025	28 February 2025	
22	> SAR 1 m	2022, 2023, 2024	by 31 December 2025	21 March 2025	
23	> SAR 750,000	2022, 2023, 2024	before 31 March 2026	27 June 2025	
24	> SAR 375,000	2022, 2023, 2024	by 30 June 2026	26 September 2025	
25	> SAR 187,500	2022, 2023, 2024, 2025	by 1 February 2027	24 July 2026	

Wave 8 was announced as revenue “amounting to” SAR 40 m. Waves marked VERIFY were not re-read from the ZATCA page for this edition; figures follow ZATCA's announcement as compiled in public datasets, so confirm against your notification.

07 Go-live evidence pack

	Check
☐	ZATCA wave notification and your year-by-year revenue test, reconciled to VAT returns
☐	EGS unit register: unit, location, CSID serial, expiry, owner
☐	Compliance-check results and production CSID per unit
☐	Sample cleared standard invoice, reported simplified invoice, credit and debit note
☐	Incident log with ZATCA notification and recovery evidence
☐	Archive test: retrieve an XML and its response for a given date

08 Sources (checked November 2026)

1. E-Invoicing Regulation and Implementation Resolution (controls, requirements, technical specifications) with Annexes 1–2, ZATCA. zatca.gov.sa › E-Invoicing
2. VAT Implementing Regulations Arts 53–54, Arabic text, 10th edition April 2025. zatca.gov.sa/ar/RulesRegulations/Taxes/Documents/Implmenting Regulations of the VAT Law.pdf
3. ZATCA Tax Invoicing and Records Guideline, version 3, May 2026, §§4.2–4.3, 7.
4. ZATCA E-Invoicing Detailed Technical Guideline, §§2.1, 3, 3.5, 4.2–4.3, 6.
5. ZATCA Simplified Guideline for the Classification of General VAT Violations, 2nd ed., May 2024, e-invoicing items 8–18.
6. ZATCA wave announcements, e.g. Wave 25 (24 Jul 2026) https://zatca.gov.sa/en/MediaCenter/News/Pages/Wave25-E-invoicing.aspx; Wave 24 zatca.gov.sa/en/Pages/news-1426.aspx; full list in section 06 and the checker.
7. ZATCA announcement of 29 June 2026 extending the fines-exemption initiative to 31 Dec 2026; Ministerial Resolution 1117.
8. dariba.co guides: saudi-e-invoicing, saudi-e-invoicing-phase-2, zatca-e-invoice-solution-requirements, saudi-e-invoicing-penalties, zatca-e-invoicing-wave-25, tax-invoice-requirements, simplified-tax-invoices, credit-notes-and-debit-notes.

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General information only, not tax or legal advice. Based on ZATCA publications and Saudi legislation as checked in November 2026. The Arabic legislation controls, rules change, and your actual facts and dates decide the answer.