

Kingdom Of Bahrain

VAT Return Modifications

Adjustments, Corrections, Self-amendments and NBR Assessments

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1. MANUAL OVERVIEW

The purpose of this Manual is to provide VAT payers with:

- An overview of the VAT rules and procedures in Bahrain in relation to VAT return modifications, initiated by a VAT payer or by the National Bureau for Revenue (NBR); and
- The necessary guidance to help them navigate the NBR online portal and forms used to modify VAT returns (adjustments, corrections and self-amendments).

This Manual is intended to provide general information only and does not represent exhaustive or legally binding guidelines. For additional information, kindly contact your VAT Relationship Manager (RM) or refer to "VAT Guidelines" on the NBR website using the following link: https://www.nbr.gov.bh/vat guideline. You can also contact NBR's Contact Centre via email or the VAT hotline, details of which can be found under "Contact us" on the NBR website.





2. VAT RETURN MODIFICATIONS

If an adjustment is required or an error is found in the details submitted in a VAT return, it is the responsibility of the VAT payer to notify NBR and modify this information. Such modifications must occur within the 5-year statute of limitations as prescribed in the VAT Law.

Two common reasons for modifying a VAT return following its original submission are:

1. A change in a previously recorded business transaction – This would occur when the information reported in a VAT return was valid at the time of submission but has since altered.

Non-Exhaustive Examples:

- An unsatisfied customer returns purchased goods, triggering the issue of a credit note
- Goods received are damaged, triggering a change in the acquisition costs, and the receipt of a credit note
- Confirmed non-payment or bad debt case
- Adjustment of input VAT on capital assets
- 2. **An internal error** VAT payer made a mistake in reporting transactions in the original VAT return.

Non-Exhaustive Examples:

- Understatement of deductible input VAT where certain purchase invoices are not included for a given VAT period
- Overstatement of VAT where a value of 146,573 is reported incorrectly as 164,573 on the VAT return
- Wrongful treatment of a supply where it was zero rated instead of standard rated

Note that NBR reserves the right to conduct an assessment of a submitted VAT return. Please refer to Section 4 of this Manual for additional information.

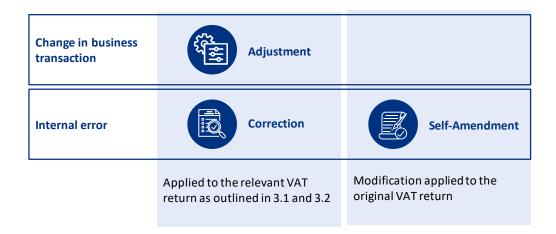


3. HOW CAN VAT RETURNS BE MODIFIED?

A change in a previously recorded business transaction should be modified by means of adjustment, while internal errors should be modified through corrections or self-amendments.

All such modifications should be completed via the NBR online portal.

Means of modification



Sections 3.1-3.2 of this Manual will provide step-by-step guidance for each process of modification on the portal.

3.1. Adjustments

Adjustments due to a change in a previously recorded business transaction must be done in the VAT return of the VAT period during which the change occurred. For example:

- In Q1, a registered VAT payer sells goods to a customer and reports the sale
- In Q3, the customer returns the purchased goods to the VAT payer
- The VAT payer records the return of goods as an adjustment in the Q3 VAT return

If the adjustment is not made during the relevant VAT period, the VAT payer must then submit a correction or self-amendment to modify the error. Note that for the purpose of adjusting input VAT on capital assets, this should be reported in accordance with the provisions of VAT Law Article 60.

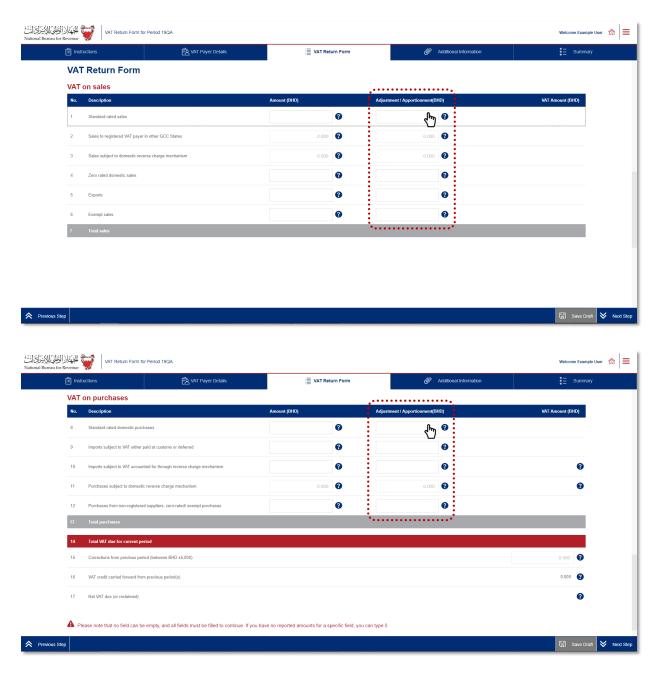
The VAT return should be completed following the standard procedures established for submitting VAT returns on the NBR online portal; please refer to the VAT Return Filing Manual for additional information.



Adjusting a VAT return

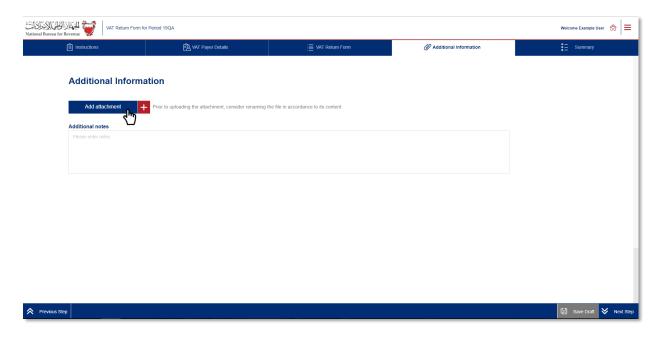
In order to cover any adjustments for business transactions that have already occurred and been reported in previous VAT periods, necessary modifications should be made in the "Adjustment/Apportionment (BHD)" column, after completing the details of the "VAT Return Form" of the current VAT period.

As shown below, adjustments for both input and output VAT should be completed in the column highlighted in red.





It is recommended that any adjustments submitted in the VAT return are supported by an explanation and/or supporting documents. Such information may be uploaded in the "Additional Information" section of the application.







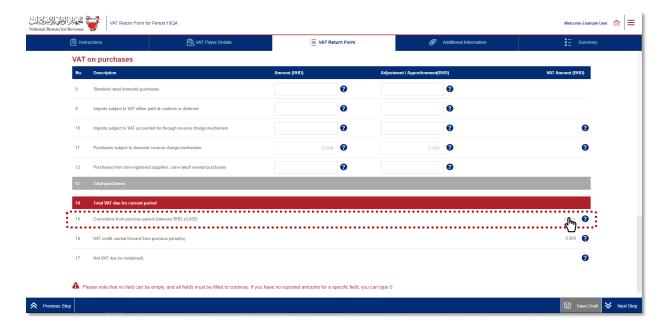
3.2. Corrections and Self-Amendments

Internal errors leading to a misreported net VAT due or refundable of less than BHD 5,000 can be completed as a correction in the VAT return of the VAT period following the original VAT period.

The VAT return should be completed following the standard procedures established for submitting VAT returns on the NBR online portal; please refer to the VAT Return Filing Manual for additional information.

Correcting a VAT return

In order to cover any corrections from the previous VAT period, the VAT payer should input the correction amount in Line 15 "Corrections from previous period", after completing the details of the "VAT Return Form" of the current VAT period.



It is recommended that any corrections submitted in the VAT return are supported by an explanation and/or supporting documents. Such information may be uploaded in the "Additional Information" section of the application.

On the other hand, a self-amended VAT return should be submitted if there is an error leading to a misreported absolute value of net VAT equal to or greater than BHD 5,000. Unlike modifications done by means of adjustment and correction, self-amendments will substitute an original VAT return.

Please note that self-amendments may be subject to penalty.



Self-amendments are usually submitted in the following cases where:



A VAT payer chooses to make a modification immediately rather than wait until the next VAT period to submit a correction of less than BHD 5,000. While this remains at the discretion of the VAT payer, such amendments may be subject to penalties.



An internal error occurs resulting in a net VAT due equal or greater than BHD 5,000. Or, an error occurs that does not exceed BHD 5,000 but is detected too late and cannot be reported in the VAT return of the VAT period following the original VAT period (i.e. as a correction).



The VAT payer fails to submit a VAT return for a given VAT period and is issued an estimated assessment in which the net VAT due for that given VAT period is determined by NBR. Before the issued assessment is deemed final and binding, NBR will grant the VAT payer a defined period to self-amend this assessment.

Kindly note that a VAT return under NBR assessment cannot be amended. VAT payers must wait until this assessment is complete or contact NBR and notify them of the amendments they would like to perform.

To initiate a self-amendment, the VAT payer must access the original VAT return on the NBR online portal.

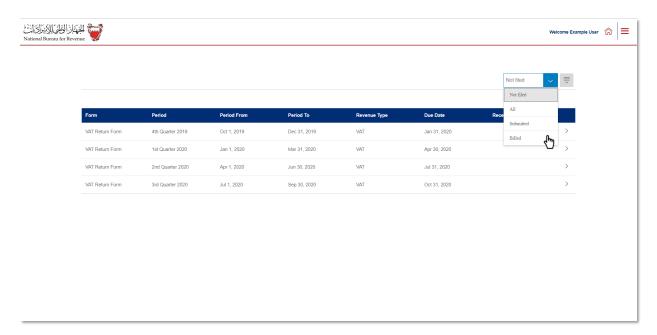
Accessing the original VAT return

Log in to the NBR online portal; please refer to the Return Filing Manual available on the NBR website for additional information. Then access your filing obligations and history by clicking on "VAT Returns".

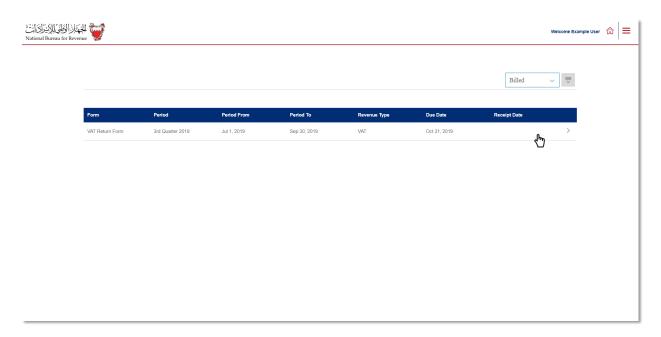




You will then be redirected to a page containing all the outstanding VAT returns (i.e. not yet filed). Filter your "VAT Return Forms" to access previous filings by selecting "Billed" from the drop-down menu at the top right corner of the screen.



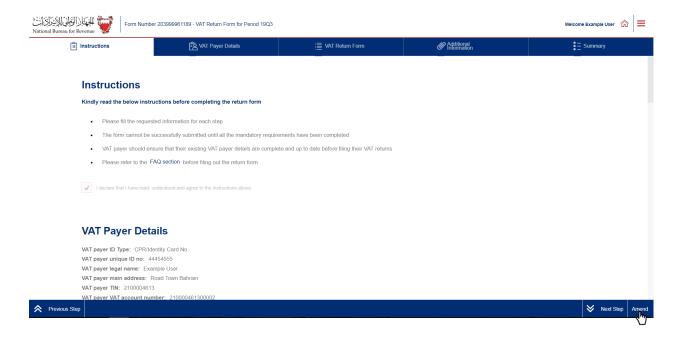
Choose the VAT return for which you would like to submit the self-amendment.



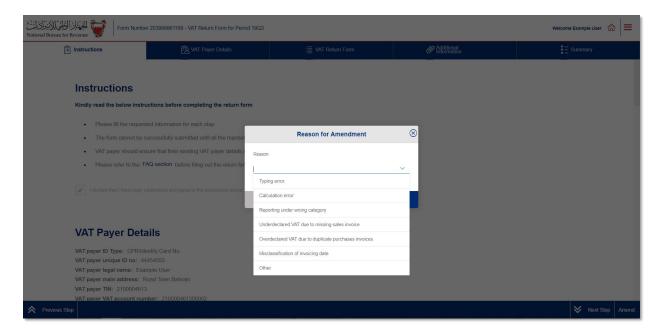
Amending the VAT return

Once you have accessed the VAT return, notice that you will be unable to make any modifications until you have clicked the amend button at the bottom right corner. Kindly ensure that you have all the necessary information to complete the self-amendment as you will be unable to save the progress.





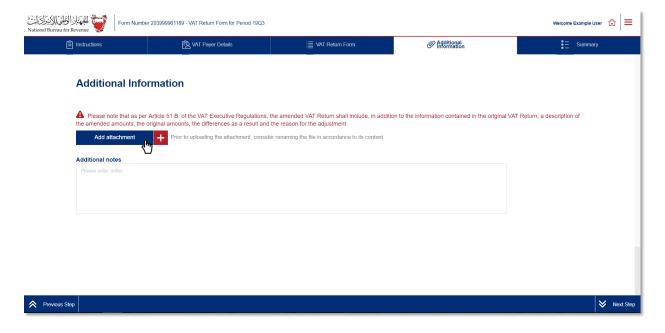
Click on the drop down and choose the most applicable reason for amending the return.



After confirming the "Instructions" and "VAT payer details" sections, complete the necessary amendments on the "VAT return form". For additional guidance, click on the question marks (tooltips) and a hover box will appear to further explain the line item.

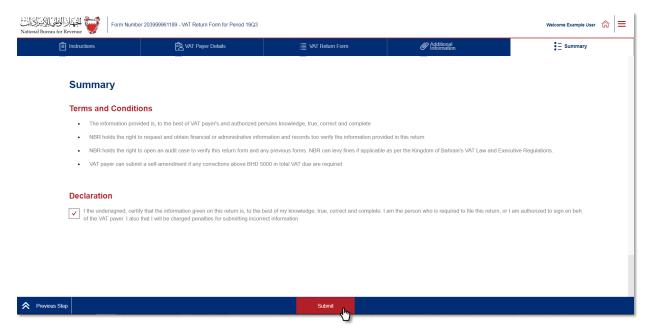
In addition to the information contained in the original VAT Return, a self-amendment should include a description of the amended amounts, the original amounts, the differences as a result and the reason for the modification. This information should be uploaded as attachments or written in the "Additional notes" box found in the "Additional Information" section of the application.





Submitting the self-amendment

Once the form is completed, and after agreeing to the declaration, you will be able to review and submit your self-amendment.

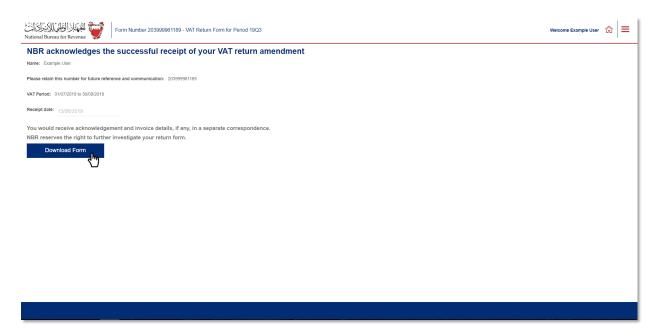


You will then be redirected to a page confirming the successful submission of your self-amendment; there you will be able to view your submission and access the successful submission acknowledgment form. You should also expect to receive an SMS and email confirming your submission.

Kindly note that if you have filed a debit return, you should also receive a bill in "My Documents" breaking down your liability. If you have excess credit from a previous period, and that credit was used



to offset your filed debit (in full or in part), you should expect to receive an offsetting letter under "My documents" on the portal as well.



Confirmation Receipt of self-amendment for your VAT return





4. WHEN DOES NBR ASSESS A VAT PAYER'S RETURN?

4.1. What is an NBR VAT assessment?

It is NBR's right and mandate to ensure the validity, completeness and accuracy of the transactions declared in a VAT return. A VAT assessment is the standard procedure whereby NBR will assess:

- The general compliance level of a VAT payer with the VAT legislation
- Whether the net amounts of VAT payable or receivable are correct

During an assessment, NBR will notably examine the records and documents that are required to be maintained by the VAT payer (e.g. invoices, sales/purchase registers or customs declarations). Please refer to Section 17.2.5. of the VAT General Guide for a more comprehensive understanding of NBR's authority with regards to a VAT assessment.

4.2. When and where does an NBR VAT assessment take place?

If NBR decides to assess (i.e. audit) one or more VAT periods, it will inform the VAT payer by email. The details of this decision may include deadlines and requests for information or documents that are relevant to NBR's assessment.

When conducting a field-assessment, NBR may inform the VAT payer of the visit in advance. This notification may include the expected start date, location and records that should be made available during the audit. This should allow enough time for the VAT payer to prepare the appropriate records for assessment and ensure that the relevant employees are available during the assessment.

NBR assessments can cover one or more VAT periods (e.g. one month or two years). However, NBR will not reassess net VAT relating to a VAT period that has been previously assessed unless:

- 1. New information is discovered that was not available at the time of the previous examination and assessment; and
- 2. This information requires reassessment.

An assessment may be carried out at either a VAT payer's premises or NBR's offices.



4.3. Assessment results

Once the assessment has been completed, a VAT payer should expect to receive a notification highlighting the assessment result. The outcome of the assessment will indicate that the case has either been "released as-is" or has been subject to an assessment decision by NBR.



If an assessment does not evidence non-compliance with the VAT legislation and NBR procedure, the VAT payer will receive a letter indicating that the assessment has been completed and the VAT return was "released as-is."



If NBR has determined that a change is required in the VAT return, NBR will issue a VAT assessment decision. This notification will refer the VAT payer to their updated bill (with the new amount due and due date) to address any outstanding liability.

If a VAT payer does not agree with NBR's assessment decision, the VAT payer has the right to object to this decision. Please refer to Section 17.3 of the VAT General Guide for additional information on the review and appeals process.

