What Are Digital Goods, Services and E-Commerce for Purposes of Cambodia's VAT Reverse Charge? – *Edwin Vanderbruggen*

Note: The below is a brief analysis solely for research and other academic purposes. The note includes interpretations that are purely personal points of view of the author. This note is not legal or tax advice, and it does not describe interpretations which are adopted by the tax authorities or in the course of tax audits in Cambodia.

1. E-commerce and the scope of application of VAT in Cambodia

In the midst of the COVID pandemic, the Cambodian Ministry of Economy and Finance saw its tax revenue dropping off a cliff. No tourists, much less exports, closed factories, far less tax collection. Among the very few options to somehow limit the damage to the Treasury, there was one appealing possibility. During the pandemic, where home shopping became the rule, e-commerce and thus revenue from e-commerce shot to amazing new heights. Why not focus on this windfall profit earned by a small number of suppliers? A range of new measures were born, including commercial and tax registration of previously below the radar local resellers of imported goods that were ordered online, and a new VAT taxability for non-resident suppliers of digital goods, digital services and other e-commerce activity. This note focuses on the scope of application of that new VAT taxability.

Largely inspired by the EU example in the 2006 VAT Directive, a two-pronged approach was chosen: non-resident suppliers that provide the taxable goods/services/activity to Cambodian residents without a (full) VAT registration (which the regulation refers to as "B2C") are required to obtain a simplified VAT registration themselves, charge VAT on the supply, receive the VAT from their customer and pay it onwards to the GDT. Recipients which do have a (full) VAT registration (or "B2B") are not charged VAT by the non-resident supplier, but instead declare and pay this VAT through the system of Reverse Charge. Much to the GDT's credit, the newly created simplified VAT registration for E-Commerce became at least a financial success, as many online giants such as Facebook, Google and Microsoft with customers in Cambodia obtained the new VAT registration numbers and started, sometimes wrongly, imposing VAT on their supplies into Cambodia.

In this note we are mostly concerned with the scope of application in terms of the supplies. This scope is in fact VAT taxable identical between the two prongs, which only differ in collection method. It is set out in Sub-Decree 65[1] as follows:

> *"This Sub-Decree covers the supply of digital goods or [digital] services or any e-commerce activity via an electronic system carried out by a non-resident supplier from outside Cambodia into Cambodia"[2].*

From art. 2 Sub-Decree it appears that at the highest level, the following elements are needed to establish the VAT taxability under Sub-Decree 65:

(1) There is a supply.
(2) The supply is made by a non-resident.
(3) The recipient of the supply is a resident of Cambodia (which can be an individual, or non-VAT registered enterprise or VAT-registered enterprise).
(4) The supply takes place from outside Cambodia to inside Cambodia.

[1] Sub-Decree No. 65 ANKr. BK on Implementing the VAT on E-commerce dated 8 April 2021 ("Sub-Decree 65")
[2] Art. 2 Sub-Decree 65.

(5) The nature of the supply is
    a. a digital good; or
    b. a digital service; or
    c. an e-commerce activity; or
    d. several of the above a, b and c.

One thing the observer will immediately notice, especially after studying the list of examples attached to Sub-Decree 65, is that these three concepts "digital goods", "digital services" and "e-commerce", must mutually overlap. Clearly, supplying digital goods and services is comprised in "e-commerce" according even to the definition provide in Cambodia's Law on Electronic Commerce[3]. On the other hand, one will be hard pressed to find an example of e-commerce that is not (also) a supply of digital goods or services. If that is correct, one wonders what the "e-commerce" part of the definition of taxable supplies really adds.

2. <u>What are "digital goods" for purposes of VAT Reverse Charge?</u>

Sub-Decree 65 defines the term "digital goods" as follows:

> *"Intangible goods which are ordered, supplied and delivered entirely via an electronic system"[4].*

Sub-Decree 65 does not itself define what "intangible goods" are, but the very similar "intangible assets" as defined in Cambodian income tax regulations does offer some suggestions, notably that these are:

> *"Rights to use, copyright, scientific, artistic works; patents, brands, trademarks, secrets; Know how or information related to industry, trade; In essence anything that is intangible"[5]*

It is important to note that, for a supply to be VAT-taxable under Sub-Decree 65 as a "digital good", the intangible must be **entirely**[6] transacted online (or, if that exists, another electronic system). The good needs to be susceptible to pass through that system. This raises questions for complex supplies that consist out of both tangible, physical and intangible goods. For example, the supply of a core banking management system which consists out of software and hardware cannot, at least not in its totality, be regarded a "digital good" nor as we will see below as a "digital service".

To better understand the key definitions, Sub-Decree 65 has helpfully provided an Annex which is a fully valid and authoritative part of the Sub-Decree ("the Annex"). That Annex provides a list of examples which is, according to the text "not limitative", and supposedly refers to e-commerce, but we have already established that the supply of digital goods is included in the wider "e-commerce activity" anyway. The examples in the Annex, even not meant as a strict limitation, do allow us to understand better what digital goods are. The examples that are clearly associated with "digital goods" are, for example:

- "Electronic order and download digital products" (items 2 and 3 Annex)
- "Single use software" (6 Annex)
- "Application, hosting, license" (7 Annex)

[3] Law on Electronic Commerce, Annex art. 32.
[4] Art. 3 par. 3 Sub-Decree 65.
[5] Prakas Tax on Income art. 7.1.1.
[6] Remarkably, the definition of "digital services" does not include reference to "entirely".

- "Data retrieval" (15 Annex)
- "Delivery of exclusive or high value data" (16 Annex)
- "Technical information" (19 Annex)
- "Information delivery" (20 Annex)
- "Content acquisition" (25 Annex)

These above examples all relate to cases where the intangible good itself only exists in electronic form such as data, a picture, videos or software.

There is one intangible good, "Technical Information", for which this at first glance is less so. This reads:

> *"the customer is provided with an undivulged technical information concerning a product or a process (e.g. a narrative description and diagram of a secret manufacturing process"*[7]*.*

Clearly, this example is in fact describing a transfer of know how or other privileged industrial information. A payment for this kind of transfer of an intellectual property right is a royalty. The GDT has issued an official "Frequently Asked Questions" document, which we believe gives the proper perspective on the issue of royalties, including royalties for technical information:

> *"Question: Is an intercompany royalty charge considered under the scope of this regulation? Answer: It depends on the nature of the royalty charge. If the royalty is related to using an online platform, then, yes, it is within the scope of e-commerce activity*[8]*"*

It is worth remembering that also for technical information, the requirement is that the information is *entirely* ordered, supplied and delivered through online or the e-system. For example, if the transfer calls for the signature of a physical contract with an exchange of the actual physical signature pages, or when the information is accompanied by training and supervision onsite, this condition would not seem to be met.

3. <u>What are "digital services" for the purpose of VAT reverse Charge?</u>

Sub-Decree 65 defines "digital services" rather succinctly as:

> *"a service that is being transacted via an electronic system"*[9]

There is no definition of "transacted via an electronic system" in Sub-Decree 65, although the Annex clarifications do allow us to make some solid conclusions. The Annex mentions several examples of e-commerce which are clearly digital services according to the definition in Sub-Decree 65:

- "Application Service Provider" (9 Annex)
- "Website hosting" (11 Annex)
- "Software maintenance" (12 Annex)
- "Data warehousing" (13 Annex)
- "Computer support" (14 Annex)
- "Advertising" (17 Annex)
- "Electronic access to professional advice" (18 Annex)
- "Access to interactive website" (21 Annex)

[7] Item 19 on the Annex of Sub-Decree 65.
[8] Frequently Asked Questions for Implementing the VAT on E-commerce Transactions (hereafter: "the FAQ"), question 42.
[9] Art. 3 par. 4 Sub-Decree 65.

- "Online auctions" (23 Annex)
- "Streaming live" (26 Annex)

It is noteworthy that most of these examples are services which can only be delivered through the Internet. The service ordering, performing and delivering is almost entirely automated and has zero or negligible human intervention.

The condition that the service must be "transacted via" an online or other e-system means, in my opinion, that the electronic system is core to the nature and delivery of the service[10]. In my view, the use of "transacted via" means the service itself is capable of being completed online or through that electronic system. More specifically, the ordinary reading of the text indicates that it is not sufficient for the service to be "supported by", "facilitated by", "paid by", "ordered by" or even "delivered by" an electronic system. Those operative terms appear to me to convey less importance for the electronic nature of the service than "transacted by", which is the standard that is required by Sub-Decree 65.

It is helpful to consider the associated definition of "electronically supplied services" in EU VAT law. The corresponding rule in regulations under the EU VAT Directive reads:

> *'Electronically supplied services' as referred to in Directive 2006/112/EC shall include services which are delivered over the Internet or an electronic network and the nature of which renders their supply essentially automated and involving minimal human intervention, and impossible to ensure in the absence of information technology[11].*

Obviously, the definition of "digital services" of Sub-Decree 65 omits the EU VAT's reference to (1) "the nature of which renders their supply essentially automated and involving minimal human intervention" and to (2) "and impossible to ensure in the absence of information technology". Nevertheless, there are strong indications in the Annex and the FAQ that "transacted via an e-system" actually means the opposite of "by human intervention". Thus, in my view, the actual meaning of Cambodia's "digital services" and the EU's "electronically supplied services" will in many respects be the same in both VAT systems, despite the omissions in the text of Sub-Decree 65.

To support my view, one can find several arguments in the Sub-Decree, its Annex and the "Frequently Asked Questions" document issued by the GDT in connection with VAT on e-commerce. In several places, the Annex gives an example of a broad type of service and then makes it clear that only a particular way or kind of that service will be regarded as "digital" in nature, and by implication, the other kinds are not. This happens with the broad category of advertising services[12], where the Annex states that only online advertising through clicks and websites is e-commerce or a digital service. Likewise with the broad category of commercial intermediation services, which the Annex only treats as digital services if the introduction happened through an online sales referral program with websites, links and clicks[13]. The same with sales services by means of auctions. The Annex states that only online auctions with an online system are digital services[14]. Furthermore, the FAQ states that

[10] The Sub-Decree was issues by the GDT with an "unofficial translation" which has chosen the term "transacted". The legally operable version is of course in Cambodian language. The term used in Cambodian is "……." which is in the official Cambodian dictionary translated as……

[11] …….

[12] Item 17 Annex

[13] Item 24 Annex

[14] Item 23 Annex

only education services which happen "live" and not automated by an online platform, are digital services or e-commerce[15].

In other words, to a large extent Sub-Decree 65 recognizes that not all cross-border services are in fact digital in nature. Except for services which are themselves about online systems or applications (such as website hosting, ASP's, remote software and computer services, etc.), it is entirely possible to have cross-border services in a wide range of categories that are not digital in nature. For a cross-border service to in fact be VAT-taxable under the Sub-Decree, the service must be transacted via an electronic system, which again means, as is demonstrated by the nature of most[16] of the examples in the Annex and FAQ, that the electronic nature is core to the service.

I do not believe that the example provided in the Sub-Decree "electronic access to professional advice" displaces the above interpretation. It reads:

> *"A consultant, a lawyer, a doctor, or other professional service provider advises customers through email, video conferencing or other remote means of communications[17]"*

In this example, the Sub-Decree sets out two conditions for VAT-taxability: (1) the supply of an actual advice, and (2) this advice passes verbally or in writing through the online or e-system. That is to say, the actual service consists out of the passing of the advice online. Although there is here a very high degree of human intervention with a professional giving advice in a zoom as well, supplying an advice is not the full range of what professionals do. The service performed by an environmental consultant to evaluate the impact on the environment at any given site is very different from the consultant giving an advice over Zoom. To be sure, the client can talk to the environmental consultant over the Internet, but that talking is not the service which is performed. The service is doing the environmental analysis on the site. Likewise, the service by a lawyer to plead a case in court is very different from him or her dispensing verbal advice over a call, even if the lawyer reports back and takes instructions from the client over the Internet. Taking instructions, giving the updates is all nice, but that is not the entire litigation service the lawyer was hired for. A remote consult with a doctor is very different from that professional carrying out an operation, even if that operation is streamed live for others to observe. For a simple consult, indeed the service is complete once I receive the doctor's advice through the video application. In conclusion, there are various supplies consultants, doctors, lawyers and other professionals can provide cross-border which are not the supply of an advice through telecommunication. Also here the digital component must be core to the service for the service to be "digital' in nature. It is in my view not sufficient for the supply by the professional to be "supported" through an e-system as this does not rise to the "transacted via"-level which is required by the Sub-Decree for all digital services.

In EU VAT regulations, services by professional consultants are generally not included in "electronic services"[18].

4. <u>What is "E-commerce" for the purpose of VAT Reverse Charge?</u>

[15] Question 33 FAQ
[16] Items 18 "electronic access to professional advice" and 19 "technical information" might be seen by some as going outside the scope ….
[17] item 18 Annex
[18] Implementing Regulations Art. 7, points 3. "[Par. 1 shall not cover…] services of professionals such as lawyers and financial consultants, who advise clients by e-mail"

E-commerce as a VAT-taxable supply under Sub-Decree 65 is defined as follows:

- "Activities involving purchases, sales, rents, exchanges of goods or services"
- "Including business activities and civil activities"
- "Via an electronic system"

The definition of E-commerce in Sub-Decree 65 does not stand isolated in Cambodian law. It was clearly based on the definition provide by specialized commercial law in Cambodia from the Law on Electronic Commerce.

> Annex 13 *"**Electronic commerce**" refers to activities involving purchase, sale, rental, exchange of goods or services, including business activities and civil as well as activities and various transactions by the state through electronic system*[19].

The addition of "e-commerce activity" to the scope of application of the VAT-taxability is somewhat difficult to understand given that "digital goods" and "digital services" seem to comprise already the full range of possibilities. In other words, as was mentioned above, one is hard pressed to find an example of a supply which is e-commerce, but not also a supply of goods or services as per Sub-Decree 65's definitions of all three terms.

5. "From outside to inside Cambodia": the cross-border requirement of VAT Reverse Charge

The General Agreement on Trade in Services ("**GATS**") is most likely the best place to start examining how services can be performed internationally. In that regard, the four "Modes of Supply" of the GATS are central to the discussion[20].

The definition of services trade under GATS has four Modes:

1. From the territory of one Member into the territory of any other Member (Mode 1, also known as Cross border trade). An example of this would be a user in country A who receives services from abroad through its telecommunications or postal connections.

2. Mode 2 is in the territory of one Member to the service consumer of any other Member (Mode 2 or "Consumption abroad"). This would be the case in case nationals of Country A have moved abroad as users such as customers, students, or patients to consume the respective services.

3. Supplying services by a service supplier of one Member, through commercial presence, in the territory of any other Member is Mode 3 or "Commercial presence". In this case, the

[19] Law on Electronic Commerce NS/RKM/1119/017

[20] Art 1 General Agreement on Trade in Services, par. 2: "For the purposes of this Agreement, trade in services is defined as the supply of a service: (a) from the territory of one Member into the territory of any other Member; (b) in the territory of one Member to the service consumer of any other Member; (c) by a service supplier of one Member, through commercial presence in the territory of any other Member; (d) by a service supplier of one Member, through presence of natural persons of a Member in the territory of any other Member".

service is supplied within the country of the customer by a locally-established affiliate, subsidiary, or representative office of a foreign-owned and — controlled supplier.

4. Finally, supply through the presence of natural persons of a Member in the territory of any other Member. This is Mode 4, presence of natural persons). This is the situation when a foreign national provides a service within the country of the customer as an independent supplier (e.g., consultant, health worker) or as an employee of a service supplier (such as a consultancy firm, a lawyer, a hospital, or a construction contractor).

6. Cross-border services provided by consultants

From the wide range of services that consultants can provide over an equally wide range of specialties, Sub-Decree 65 only targets a very select, specialized type of consulting service as a VAT-taxable activity in the Reverse Charge context. Notably, only services which can be transacted via an electronic system qualify. As I have argued above, based on the examples of the Annex in the Sub-Decree, it seems that the EU VAT's rules that electronic services must be "largely automated" and "impossible to provide without information technology" are equally valid for Cambodian VAT purposes.

For consultants, the Annex furthermore sets out that only remotely provided advice can qualify as such, and arguably not any other type of assistance by consultants. So, when the service consists out of doing something or resolving something rather than explaining something (=advice), it is likely that no VAT Reverse Charge liability is established under Sub-Decree 65.
Examples of services by professional consultants which do not qualify as "advice which is transacted via an electronic system" are:

- A legal adviser conducting negotiations on a contract;
- A tax adviser representing a client in a tax audit;
- An architect making a detailed design of a project;
- A technical consultant going through documents and plans to perform a technical audit;

It must also be kept in mind that only advice provided from outside Cambodia to inside Cambodia is determined by Sub-Decree 65 to be VAT taxable. Advice provided by consultants or professionals while in Cambodia is not taken into account, even if the advice is provided through online communication. For example, a team of Malaysian surveyors visiting Cambodia to carry out a geophysical survey does not qualify at VAT-taxable under Sub-Decree 65.

7. Cross-border advertising services

It is clear from Sub-Decree 65 that not all services which are delivered cross-border are susceptible of being "digital services". Advertising is a clear example of this conclusion.
Sub-Decree 65 does not state in any way that all cross-border advertising is VAT taxable. Only advertising that is an actual digital service, meaning with "adds that are displayed on a website", with adds that "can be clicked" may according to Sub-Decree 65 constitute a VAT-taxable digital service. No other advertising is mentioned in the Sub-Decree. For example, hiring an agent to arrange bill-boards overseas, or at airports, to hand out flyers or for brand presence at major events, print adds in inflight magazines or glossy periodicals, is not a digital service in the sense of the Sub-Decree. This is because the electronic nature must be at the core of the service, else the service cannot be "transacted via an electronic system".

8. Cross-border telecommunications services

In EU VAT Law, telecommunication and broadcasting services are explicitly excluded from the definition of "electronic services", and they each have their own regime with respect to the place of supply for VAT purposes[21]. Although there is no such explicit carve-out in Cambodian VAT regulation, the Annex does not mention telecommunication services at all. This gives the distinct impression that, although the Annex is supposedly "not limitative"[22], leaving out such an important category of international services can only mean that "telecommunication services" are not "digital services" in Cambodian VAT, just like they are not "electronic services" in the EU[23].

9. Cross-border management services

"Management services" are not mentioned as such in Sub-Decree 65 or its related regulations. Nevertheless, in practice my experience is that these type of common services which are frequently charged by related party companies are often targeted by the GDT for Reverse Charge purposes. Cambodian Income Tax law actually does provide in a definition of "management services", which has at least some relevance, and it reads as follows:

> *"Any management service designed to perform the management functions of a business, including recruitment, training, management and sales"[24].*

The problem with management fee arrangements is that they nearly always cover a long list of different services. Details are sketchy as the scope of the service is often not well documented. A mere list with a few general heads of specialties (such as "financial and marketing and operational assistance"), which leaves the parties in the dark as to the actual performances. Furthermore, or perhaps because of this, the terminology used by taxpayers means different things to different persons.

Just because of this vagueness it will often be challenging for the taxpayer to demonstrate the actual nature of the service, and whether or not the entire service is "transacted via an electronic system". For starters, as the "management service" is a composite, there will likely be some services in the mix which are transacted via an e-system, and some others which are not.

In EU VAT Law, there is no indication that management services are treated as "electronic services", which by the way does not mean that these services are not subject to VAT.

In Cambodian VAT regulations, taxpayers are well advised to steer clear of general, vague descriptions of intra-group services such as "management services" as these often leave the VAT-taxable status unresolved.

10. Cross-border commercial intermediation services

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[21] Implementing Regulations Art. 7, *3. Paragraph 1 shall not, in particular, cover the following: (a) broadcasting services; (b) telecommunications services;*

[22] Art. 3 par. 5 Sub-Decree 65

[23] The Annex's "Information Delivery" is defined as "delivering data…periodically…in accordance with personal preferences", which really does not fit telecommunication.

[24] Prakas Tax on Income 2020, art. 7 par 1, d)

Commissions, agency fees, introduction fees, any kind of consideration paid for commercial intermediaries is largely unmentioned in the Annex of the Sub-Decree. The only clear reference to this matter is with respect to Sales Referral Programs, which are almost entirely automated systems that connect websites or social media sites through links and "clicks" with websites of suppliers. There is no mention in the Sub-Decree or its related regulations of any other services by commercial intermediaries. It seems to us that, as is the case in EU VAT Law, "traditional" commercial intermediary services, which are generally not very automated and rely heavily on human action and decision making, are not VAT taxable under Sub-Decree 65. Only commercial intermediation which is at its core transacted via an e-system, notably referrals and links done by websites and online platforms, is susceptible of establishing VAT-taxability under Sub-Decree 65.

11. Cross-border training and education

In Cambodia's Law on Taxation, education is not a VAT-exempt activity[25]. However, for several years now, officially recognized educational institutes have been exempt from VAT and a range of other taxes by means of special exemption measures[26]. Sub-Decree 65 and its Annex does not list online training or education as an example of "digital services" or e-commerce. The FAQ issued by the GDT does refer to it specifically by stating:

> *"The provision of virtual education is not subject to VAT if the provided educational institution is recognized by the Government of the non-resident country and is conducted live, otherwise it is subject to VAT on e-c0mmerce (e.g. pre-recording or E-learning)"*[27]

This official reply in the FAQ is very much in line with the EU VAT's principle that services which require a high degree of human intervention, are not electronic services. Indeed, In EU VAT Law, electronic services does not include:

> *"Teaching services, where the course content is delivered by a teacher over the Internet or an electronic network (namely via a remote link);*[28]*"*

In my view, Question 33 FAQ provides a persuasive argument for taxpayers that VAT reverse charge does not apply to any type of online live training, seminars and webinars, conferences, workshops, teaching and coaching in a commercial B2B setting provided the supplying company has the legal right to provide such service.

12. Cross-border licensing or transfers of intellectual property rights

In Cambodia, intangibles such as a license or transfer of trade marks, patents, copyrighted material, know how and other intellectual property right, are included under the category "digital goods" for the purposes of Sub-Decree 65. Accordingly, such a supply must meet the conditions of a "digital good" to be VAT taxable in this context.

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[25] Art. 63 LOT exempts some supplies including agriculture, primary financial services, insurance and medical services.
[26] Including Prakas 209 and Prakas 904 containing tax incentives for the education sector. These exemptions do not apply to cross-border education.
[27] Question 33 FAQ
[28] Implementing Regulations Art. 7, *3. (j).*

Sub-Decree 65's Annex does not refer to any "traditional" IP rights i.e. IP rights which are unrelated to the Internet or to information technology. For VAT purposes, Sub-Decree 65 focuses on various software-related IP rights such as "Digital Products for Purposes of Commercial Exploitation of the Copyright"[29], "Limited Duration Software"[30], "Single Use Software"[31], "Application Hosting License"[32] or "Application Hosting Bundled Contract"[33] and "Subscription to a Website Allowing the Downloading of Digital Products"[34].

In the FAQ, the GDT provides a telling explanation how Sub-Decree 65 affects "intra-company royalty charges", by specifying that only royalties related to using an online platform are VAT-taxable in this context[35]. This statement confirms in my view that the vast majority of supplies related to IP are in fact not VAT-taxable in Cambodia's Reverse Charge context, except if they relate to IT or Internet applications.

13. Some concluding remarks

Although Cambodia has introduced a VAT together with its Income Tax in 1997, VAT Reverse Charge was never a part of the system until, in the midst of declining tax revenue during the pandemic, the country decided to introduce VAT for supplies made by non-residents but only for "digital goods", "digital services" and "e-commerce". The new tax impost was in fact well explained to taxpayers, with the GDT going to the unusual step of issuing several regulations, lists of examples and a Frequently Asked Questions document, both in Cambodian language and in English.

There is no arguing with the success of the VAT on e-commerce for the treasury. Many non-resident e-commerce providers such as Google and Facebook have obtained the simplified VAT registration, and it was reported that the collected VAT from payments by non-residents is significant and growing[36].

But the Reverse Charge portion, the B2B part of the supplies is perhaps more controversial. As enterprises with a VAT-taxable activity do have the right to deduct the VAT paid through Reverse Charge, the effect for the Treasury is more modest and more unpredictable. There is a risk that the B2B VAT results in increasing difficulties in three problem areas which the GDT is, with other regulations and measures, trying to mitigate: (1) a largely unsought tax increase on VAT exempt taxpayers such as hospitals and financial institutions, (2) an increase of the problem of refundable VAT credits for exporters, which is already an issue for an export-focused economy such as Cambodia and (3) added uncertainty in terms of the interpretation and application of Cambodian tax rules for every other enterprise.

[29] Item 3 Annex
[30] Item 5 Annex
[31] Item 6 Annex
[32] Item 7 Annex
[33] Item 8 Annex
[34] Item 28 Annex
[35] See above in this note under section 2.
[36] https://www.khmertimeskh.com/501394733/gdt-collects-63-million-vat-on-e-commerce/