



*Standard Business  
Reporting*

# Frequently Asked Questions (FAQs) - SBR domain Business Register

**Annual reports in iXBRL**

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# 1. Introduction

## 1.1 Purpose

This Frequently Asked Questions (FAQ) document addresses common questions about filing annual reports in iXBRL format with the Business Register using Standard Business Reporting (SBR). It aims to provide clear answers to these common questions that may arise during the annual reporting process.

For detailed instructions on the technical requirements and filing process, please refer to the Reporting Manual and Filing Manual. This FAQ will be updated regularly to incorporate new information, with all changes noted in the version control section below.

## 1.2 Providing feedback

Stakeholders wishing to provide feedback or raise questions / concerns with regards to the content of this document or any of the KVK-related materials on annual reports in iXBRL format are invited to direct such queries to [sbr@logius.nl](mailto:sbr@logius.nl).

Depending on the nature of such queries, it will be assessed whether it is relevant and/or necessary to provide further clarity or guidance to the public and whether a further revision is deemed appropriate.

## 1.3 Version control

<b>Version</b>	<b>Date</b>	<b>Description</b>
0.5	24 September 2024	Initial draft version

## 2. Frequently Asked Questions

### **What is the regulatory framework?**

#### Decree on electronic filing business register

The rules for preparing, filing, and auditing annual reports are set out in Part 9, Book 2 of the Dutch Civil Code (DCC). According to article 2:394 of the DCC, companies must file their annual reports with the Dutch Chamber of Commerce (KVK).

The Decree on electronic filing business register ('Besluit elektronische deponering handelsregister') mandates that annual reports be filed with the Business Register using Standard Business Reporting (SBR), which is the Dutch method for electronic exchange of business reports and documents.

#### Implementation of the SBR Framework of Agreements at the Business Register

The document 'Implementation of the SBR Framework of Agreements at the Business Register' ('Toepassing SBR Afsprakenstelsel binnen domein Handelsregister') subsequently details how the Decree is put into practice within this specific domain. It explains the standards and specifications of the SBR Framework of Agreements that are used for filing annual reports.

#### Reporting Manual - SBR domain Business Register

This document is designed to assist legal entities, software vendors and other intermediaries in creating annual reports in iXBRL format for filing with the Business Register via SBR. It provides guidance on common issues that may be encountered when preparing annual reports in iXBRL format and explains how to resolve them. The purpose of the reporting manual is to promote a harmonised and consistent approach for the preparation of annual reports in iXBRL format.

### **To whom does the Decree on electronic filing business register apply?**

The Decree on electronic filing business register applies to all legal entities who file their annual reports with the Business Register of the Dutch Chamber of Commerce. Certain categories of legal entities were temporarily exempted from the requirement to file electronically via SBR. However, this exemption will be lifted and all entities will be required to file electronically going forward.

### **When will the Decree on electronic filing business register apply?**

The Decree on electronic filing business register will take effect for financial years beginning on or after 1 January 2025 for the previously exempted category of legal entities. Voluntary electronic filing via SBR for these entities will be available starting 1 January 2025, providing an opportunity to adopt the new format before it becomes mandatory.

### **Which components of the annual report must be filed electronically via SBR?**

The annual report consists of the financial statements, the management report and other information (including an auditor's report), unless specific filing exemptions apply pursuant to Article 2:395a - 397 DCC.

### **What format should the auditor's report be in when filing electronically via SBR?**

The auditor's report must be prepared in the same format as the financial statements to which it relates.

### **How to deal with the adoption status and document adoption date of the annual report?**

It depends. It could be included in the annual report in iXBRL format, but this might not be possible when the financial statements are signed or sealed (by either the directors or auditor) before the date of adoption is known. In this case, the status of adoption and document adoption date should be included in a separate file that is part of the IXDS (Inline XBRL Document Set).

### **How can I file my documents electronically via SBR?**

You can file your documents electronically through two options:

- *Upload portal on the KVK website*: Use the designated upload portal available on the KVK website to file the annual report manually.
- *Software integration with Digipoort*: File your documents using software that connects directly to Digipoort, the secure gateway for electronic filings.

For detailed instructions on both methods, please refer to the Filing Manual.

### **Does the obligation to file electronically also apply to the so-called 'substitute auditor's report' for non-profit organisations?**

Article 2:396 paragraph 9 DCC states that non-profit organisations do not have to file financials statements if they file a so-called substitute auditor's report. This substitute auditor's report is not in scope of the Decree on electronic filing business register. However, it is recommended to file the substitute auditor's report electronically with the Business Register using SBR.

### **Does the obligation to file an annual report electronically apply to a legal entity of public interest on the basis of Article 2:398, seventh paragraph, sub a DCC?**

No, a legal entity of public interest based on Article 2:398, seventh paragraph, sub a DCC is subject to the ESEF regulation of ESMA. Consequently, it has to file its annual report electronically with the AFM.

### **Does the obligation to file an annual report electronically also apply to a legal entity that prepares the annual report in another language (such as English, German or French) on the basis of Article 2:394 paragraph 1 DCC?**

The electronic filing system allows annual reports to be submitted in English, German, and French. The language of the annual report does not affect the start date for the electronic filing obligation.

### **Are legal entities to which the Formal Foreign Company Act applies exempted?**

No, these legal entities must prepare their annual report in line with Part 9, Book 2 DCC. This means that they must prepare their financial statements based on NL-GAAP or IFRS as adopted by the European Union.

### **What are the allowed formats?**

The permitted formats for filing an annual report with the Business Register are the XBRL-format and the iXBRL format. Depending on the reporting standard used for annual reports, additional restrictions may apply to these formats.

The XBRL format is an XBRL instance document (as defined in the XBRL 2.1 specification) that uses a fixed framework according to a 'predefined' entry point from the taxonomy. This framework facilitates the preparation of annual reports in a manner comparable to completing a form. The iXBRL format, on the other hand, is XHTML with XBRL markup, as specified in the Inline XBRL Specification.

### **If small or medium-sized legal entity opt for the iXBRL format, do they no longer have to tag the notes to the financial statements?**

For the financial year 2025, that is correct; tagging of the notes will be temporarily exempted. However, starting with the financial year 2026, block tagging of the notes, management report, and other information will become mandatory.

It's important to note that block tagging will involve less detail compared to current tagging practices. For example, with block tagging, a movement schedule in the notes will only need to be tagged as a whole, rather than tagging each individual figure.

### **If a large legal entity opts for normal XBRL, does detailed tagging of the notes still have to be done?**

Yes, the XBRL-format utilises a fixed framework according to a 'predefined' entry point from the taxonomy. This structure automatically requires you to provide detailed tagging as you complete the form.

### **Which format can be applied if the financial statements are prepared on the basis of NL-GAAP and the legal entity falls within the scope of the Implementation Decree on the Sustainability Reporting Directive?**

The iXBRL format is mandatory because the Implementation Decree of the Sustainability Reporting Directive requires that the sustainability report, as part of the management report, be publicly filed in iXBRL format. It is not permissible to submit the management report in a format different from the rest of the annual report.

### **Which format can be applied if the financial statements are prepared on the basis of NL-GAAP and contains entity-specific disclosures or deviates in layout and presentation?**

The iXBRL format must be used as it allows legal entities the flexibility to tailor the content of their financial statements to the specific circumstances of their activities. This approach enables entities to present information in a way that best reflects their unique situation, rather than being restricted to a fixed framework with a predefined entry point from the taxonomy.

**Which format can be applied if the financial statements are prepared on the basis of NL-GAAP when no suitable 'predefined' entry point is available?**

The iXBRL format must be used.

**Which format can be applied if the financial statements are prepared on the basis of IFRS as adopted by the European Union?**

The iXBRL format must be used, as it aligns with ESEF. This also applies if IFRS as adopted by the European Union has been applied to the consolidated financial statements and NL-GAAP has been applied to the company financial statements.

**Which format can be applied if the financial statements are prepared on the basis of other GAAP?**

The iXBRL format must be applied with limited markup of filing data. This markup must be included in a separate iXBRL file. The files must be included in a Report Package.