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"Tax-Ready" Real-Time Payments

Leveraging UPI to Expand India's Tax Base and Support MSME Growth

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Key Points

- Convert UPI events into minimal, privacy-preserving e-invoices via a government-certified **UPI-Tax Hub** that auto-tags transactions, issues compact invoices, and prepares pre-filled GST and income-tax summaries to reduce filing friction for MSMEs. (NPCI 2025; GSTN 2020)
- Pilot a phased, incentive-led rollout combining free basic integration, 12-month transaction rebates, device/onboarding subsidies and priority micro-credit to drive voluntary adoption and avoid punitive enforcement. (NPCI 2025)
- Design ITC capture tools (QR supplier receipts; GSTIN reconciliation; capped presumptive credits for unregistered suppliers) so micro-vendors see immediate net cost benefits from formalization. (CBIC 2020; GSTN 2020)
- Embed privacy-by-design, independent oversight and a rigorous M&E plan to safeguard trust, measure revenue gains and guide national scale-up. (Income Tax Department 2025).

Executive Summary

India's Unified Payments Interface (UPI) provides a near-universal, machine-readable trail of retail transactions (NPCI 2025). The **UPI-Tax Hub** proposed here is a government-sanctioned middleware that ingests certified UPI event streams, auto-tags sales and supplier payments, issues compressed e-invoices, and generates pre-filled GST and income-tax summaries for eligible MSMEs. (GSTN 2020; CBIC 2020). By converting everyday payments into compliance-ready records, the Hub reduces time and cognitive burdens, strengthens the tax base, and enables lenders to underwrite working capital on the basis of verifiable histories.

A 12-month, multi-site pilot (50k–100k merchants) with financial and non-financial incentives can test technical integration, ITC mechanics, and behavioural uptake. Implementation requires legal authority for certified intermediaries to submit compact e-invoices and pre-filled returns (CBIC 2020; Income Tax Department 2025), NPCI/RBI operational guidance (NPCI 2025), and privacy safeguards (data minimization, explicit consent, independent ombud). Conservative modelling shows meaningful, pilot-driven revenue gains and reduced enforcement costs. With careful sequencing and robust governance, the UPI-Tax Hub can formalize commerce at scale and serve as a replicable model for comparable economies in the Global South (Banco Central do Brasil 2025; SAT n.d.; State Taxation Administration 2024).

Introduction: Why This Matters Now

India has seen explosive growth in digital payments; UPI has become the primary retail payment mechanism for millions of consumers and merchants due to its low cost, interoperability and ubiquity across third-party apps (NPCI 2025). Yet a large portion of Indian commerce — street vendors, kirana shops, mobile food stalls, gig workers and many small service providers — remains informal, limiting the state's revenue base and constraining firms' access to formal credit.

Many micro-vendors accept both cash and UPI. The digital receipts produced by UPI present a low-cost opportunity to lower compliance burdens if they can be converted into standard, audit-ready records. The challenge is not the absence of data but the fragmentation of systems: payments, accounting and tax filing are typically disconnected; vendors often use mixed personal/business accounts; supplier invoices are often paper-based or absent; and many vendors have low digital literacy or limited device capability (GSTN 2020; Income Tax Department 2025).

The policy objective is pragmatic: increase formalization and revenue mobilisation while minimizing administrative burden and avoiding punitive or exclusionary approaches. The UPI-Tax Hub is a targeted response: a middleware layer that aggregates UPI events, auto-generates minimal e-invoices, reconciles supplier records with GSTN, produces pre-filled summaries for GST and income-tax filing, and presents one-click submission for eligible small taxpayers. Paired with incentives and vernacular outreach, this approach aims to turn a payment rail into a formalisation instrument — rewarding vendors for participating rather than punishing them.

Key design constraints include: preserving vendor trust (privacy, consent), keeping data flows minimal and auditable, and ensuring technical interoperability with NPCI, banks/PSPs, accounting software and GSTN/CBDT interfaces (NPCI 2025; GSTN 2020). Implementation must be phased, evidence-based and accompanied by an independent evaluation to refine safeguards and quantify revenue gains.

Comparative Case Studies

Comparative experience with instant-payment reporting and electronic invoicing provides practical lessons for designing a UPI-Tax Hub that broadens India's tax base without leaving out vulnerable vendors. Here are three informative cases: Brazil (PIX), China (e-Fapiao / Golden Tax), and Mexico (CFDI) (Banco Central do Brasil 2025; State Taxation Administration 2024; SAT n.d.). They are followed by key lessons for India.

Brazil, PIX and Reporting Thresholds

Brazil's instant-payments system, known as PIX, quickly expanded retail digital payments. It later added reporting requirements for certain transfers to enhance traceability. This approach uses threshold-triggered reporting instead of mandatory reporting for small transactions. The strengths of this system include greater visibility into previously undocumented flows and a limited compliance burden for the poorest users (Banco Central do Brasil 2025). On the downside, poorly set thresholds can either overlook significant transactions or impose reporting on very small users. Vendors and users need clear communication to avoid feelings of being monitored. Brazil shows that gradual reporting, along with outreach, can encourage formalization while keeping costs low for everyday transactions.

Brazil's PIX experience demonstrates the value of **incremental reporting**: threshold-triggered visibility can improve traceability without immediately imposing burdens on the smallest users. For India, this suggests piloting thresholded ITC visibility and vendor categories (e.g., micro vs. small) rather than universal mandates. Calibration and clear outreach are essential to avoid perceptions of surveillance that can drive vendors back to cash.

China, e-Fapiao and Centralized Invoicing

China's fapiao system promotes electronic invoices (e-fapiaos) with real-time issuance and validation by tax authorities. Integration with point-of-sale systems, accounting, and tax platforms allows nearly automatic reconciliation and strong VAT compliance (State Taxation Administration 2024). The advantages of this model include its scale and auditability, making fraudulent invoicing more difficult and speeding up reconciliations. However, it has drawbacks, including significant centralization that raises privacy and governance concerns, high implementation costs, and the need for strong IT capabilities on both the tax authority and vendor sides. China's experience reveals that centralized e-invoice systems can yield significant revenue increases but must have solid governance, legal backing, and public trust.

China's centralized e-fapiao shows how integrated invoice validation can drastically cut VAT leakage at scale — but it also illustrates governance and privacy trade-offs. For India, a Hub should adopt **central validation for supplier GSTINs** while embedding independent oversight, strict purpose-limitation, and limited retention to preserve trust (GSTN 2020). This hybrid validation approach, which avoids unnecessary buyer data, aligns with India's privacy and inclusion constraints.

Mexico, CFDI and Mandatory e-Invoicing

Mexico implemented a nationwide requirement for electronic invoicing (CFDI) that led to significant increases in reported revenues, particularly for VAT. This success came because nearly all B2B and B2C invoices became auditable. However, the swift mandate also presented compliance costs and technical challenges for small businesses (SAT n.d.). Mexico's experience teaches that mandates work best when there is extensive technical support, subsidies for onboarding or POS upgrades, and phased timelines that protect very small vendors.

Mexico's mandatory CFDI rollout produced large revenue gains but also imposed compliance costs on micro-firms. India should adopt **supportive subsidies and technical assistance** for vendors and suppliers before any mandate, using Mexico's phased supports as a template for onboarding, training, and POS subsidies. This reduces the political and distributional costs of formalization (CBIC 2020).

Synthesis: What These Cases Suggest for India

- **Begin with incentives and pilot projects, not immediate universal mandates.** Brazil's threshold approach and Mexico's phased challenges suggest that gradual implementation

— through pilot sectors, thresholds, and meaningful incentives — reduces political resistance and protects the most vulnerable.

- **Balance centralization with privacy and governance.** While China’s centralized validation is effective, it should be accompanied by strong privacy protections, independent oversight, and clear data-use policies to maintain trust.
- **Encourage supplier-side digitalization.** Input tax credit relies on supplier invoices. Policies should motivate upstream suppliers to issue machine-readable invoices by offering benefits like reduced settlement fees, faster payments, and improved market access.
- **A technical ecosystem and developer support are vital.** Providing open APIs, SDKs, and grants for local developers can speed up low-cost integrations for POS systems, accounting applications, and user-friendly interfaces, lowering compliance costs for small vendors.
- **Create anti-fraud and reconciliation tools from the start.** Automated GSTN reconciliation and anomaly detection help prevent manipulation and collusion among suppliers. These tools should be transparent and include non-punitive initial responses such as education and correction opportunities.
- **Use gradual presumptive measures for the toughest cases.** For unregistered suppliers, like those in fresh produce, capped presumptive input tax credits or simplified vouchers can promote digital capture without requiring full input tax credit claims immediately.
- **Clearly communicate benefits to merchants.** Immediate advantages — such as faster loan approvals and visible cost reductions from input tax credits — are crucial for encouraging vendors to move toward formalization.

In summary, the experiences of these three countries illustrate that combining technology with authority can shift compliance dynamics. However, success depends on careful sequencing, affordability for the smallest businesses, privacy protections, and clear early benefits. For India, the best approach is a phased pilot heavy on incentives that links UPI’s extensive reach with strong governance, robust developer support, and clear economic advantages for micro-vendors.

Proposed Solution: The UPI-Tax Hub – Architecture and Features

The UPI-Tax Hub is a government-certified middleware that connects UPI transaction streams with tax portals and accounting apps. It is intentionally lightweight, privacy-preserving and developer friendly (NPCI 2025).

Core Components

- **Ingestion layer:** certified connectors from PSPs/NPCI forward UPI event metadata (merchant UPI ID, amount, timestamp, UPI ref).
- **Processing & classification:** rule-based and ML-assisted modules auto-tag transactions (e.g., SALE, SUPPLIER_PAYMENT, SALARY) and attach confidence scores; ambiguous items prompt a quick vendor confirmation.

- **Invoice engine:** issues compact e-invoices containing minimal fields (merchant ID, supplier GSTIN if present, invoice no., taxable value, tax amount, timestamp, UPI reference) stored in an encrypted invoice store (CBIC 2020; GSTN 2020).
- **Export & reconciliation APIs:** standardized endpoints push pre-filled summaries to GSTN and CBDT; reconciliation checks supplier GSTINs and flags mismatches (GSTN 2020).
- **Vendor interfaces:** vernacular dashboards (mobile/web/USSD/IVR) for invoice history, pre-filled return review and “Trusted Vendor” status; simple agent-assisted onboarding for low-literacy users.
- **Privacy & security:** data minimization, encryption, consent management, audit logs, and independent audit authority (Income Tax Department 2025).

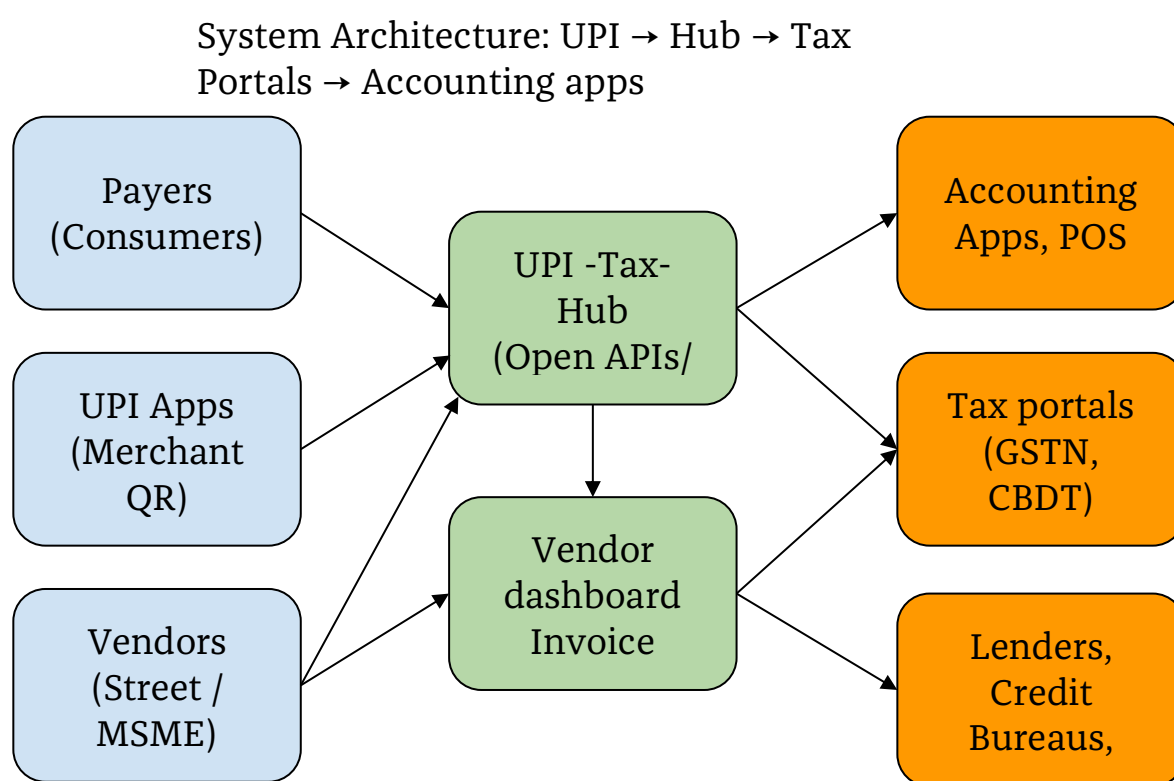


Figure 1: System Architecture: shows UPI payer and merchant flows into the UPI-Tax Hub, and downstream connections to accounting/POS providers, tax portals (GSTN/CBDT), vendor dashboards, and lenders/marketplaces.

Governance Model

A multi-stakeholder steering committee (NPCI + CBDT/MoF + RBI + GSTN + merchant reps + civil society) sets strategic direction. NPCI hosts technical infrastructure under RBI oversight; CBDT/GSTN manage tax integration and reconciliation rules. An independent Privacy Ombudsmen audits compliance and adjudicates grievances (RBI; NPCI 2025; Income Tax Department 2025).

Core roles: NPCI hosts technical infrastructure; RBI provides payment oversight; CBDT and GSTN handle tax integration and reconciliation; banks/PSPs support settlement and onboarding; fintechs/accounting vendors build integrations; state tax departments & municipalities manage local outreach; merchant associations/NGOs support training; lenders use Hub data for credit; an independent Privacy Ombud audits and adjudicates (NPCI 2025; GSTN 2020).

Governance bodies: Steering Committee (NPCI + MoF/CBDT chair) for strategy; Technical Advisory Group for API standards and security; Privacy & Accountability Board for data rules and audits; Operational Secretariat for implementation.

Safeguards: MoUs and SLAs for uptime and data retention; legally binding data-sharing agreements with consent clauses; quarterly public dashboards and a two-tier grievance process (state → ombud).

Pricing and incentives:

- **Basic tier (free):** auto-tagging, minimal invoice issuance, monthly pre-filled summaries, and vendor dashboard.
- **Premium tier (nominal fee):** advanced analytics, bookkeeping integrations, and marketplace connections.
- **Subsidies:** The micro-vendor tier is subsidized for 12 months during the pilot and is eligible for rebate and incentive packages (transaction rebates, device subsidies, credit windows).

User journey (example)

1. The merchant links the UPI-merchant ID to the Hub, with assistance from in-market agents.
2. A sale through UPI is auto-tagged; the Hub issues an e-invoice and stores it.
3. At the end of the month, a pre-filled return is generated; the merchant reviews it (in their language) and clicks “submit.”
4. Verified transaction histories can be shared (with consent) with lenders for quick credit approval.
5. Transaction history is optionally shared with partnered micro-lenders for expedited credit approval.

By using open technical standards, strong privacy defaults, and a focus on incentives, the UPI-Tax Hub aims to reduce compliance costs, boost tax filing, and make formalization beneficial for micro-merchants.

Legal and Regulatory Provisions: Changes and Integration

To fully operationalize the UPI-Tax Hub, certain amendments to India's tax and digital governance frameworks are necessary:

- **GST Act and Income Tax Act:** The legal equivalence of Hub-generated transaction data and pre-filled returns must be established. This would reduce the risk of disputes and litigation and ensure the data is a legally valid record.
 - CBDT/GSTN authorizes acceptance of certified pre-filled turnover and expense summaries transmitted by registered UPI-Tax Hubs for taxpayers subscribing to the simplified/ presumptive scheme, subject to vendor consent and audit rights (ITR, n.d.).
- **Data Protection Frameworks:** While strong privacy protocols are included by design, clear regulations must govern the use and sharing of transaction data to prevent misuse and build trust with vendors.
 - Certified Hubs must implement data minimization, explicit consent flows, retention limits (e.g., 3-5 years), and submit to periodic audit by an independent Privacy Ombudsmen.
- **CBDT and GSTN Joint Notifications:** Legal provisions should allow these bodies to jointly identify simplified filing categories and permit certified intermediaries to submit pre-filled summaries.
 - CBDT/GSTN may notify certified intermediaries (UPI-Tax Hubs) whose compact e-invoice datasets (per published schema) shall be admissible for ITC reconciliation and pre-filled return generation, subject to GSTN validation and audit trails (CBIC 2020; GSTN 2020).
- NPCI shall host certified Hub endpoints. RBI to issue supervisory guidance for Hub operations and temporary MDR relief for pilot adopters (NPCI, n.d.).

Policy Design and Mechanisms (Including ITC Mechanics)

The Hub's policy design pairs technical automation with fiscal levers and behavioral nudges. Central to vendor uptake is making Input Tax Credit (ITC) tangible and easy to claim (CBIC 2020).

Simplified ITC Capture

- **Compact e-invoice standard:** minimal invoice payload with supplier GSTIN, invoice number, date, taxable value, tax amount, HSN short code and UPI reference—sufficient for GSTN reconciliation while limiting data burdens (CBIC 2020; GSTN 2020).
- **QR receipts at wholesale:** suppliers/wholesalers generate QR codes for invoices; buyers scan at purchase; the Hub ingests the payload and associates it to the merchant account.
- **GSTN reconciliation:** Hub cross-checks supplier GSTIN and invoice numbers with GSTN records to validate ITC eligibility before presenting claims (GSTN 2020).
- **Presumptive ITC:** For purchases from unregistered suppliers (e.g., produce), a capped presumptive ITC (small percentage of recorded inputs up to a ceiling) is allowed when purchases are recorded and verified via hub workflows. This encourages digital capture where formal invoices are not feasible.

- **One-click ITC claim:** The Hub aggregates validated inputs, pre-populates ITC schedules, and clearly shows the merchant the net cost benefit in plain language before they approve inclusion in returns.

Segmented Compliance and Return-Free Filing

- **Nano vendors (very small turnover):** eligible for presumptive schemes and one-click return submission (return-free filing) when a high-confidence threshold of auto-tagging is met.
- **Micro & small vendors:** auto-filled returns available for review; vendors retain the option to amend.
- **SME tier:** merchants with accounting systems may use full SDK integrations to import Hub records.

Incentive Architecture

- **Financial:** 12-month transaction-fee rebates for Hub adopters, one-time onboarding/device subsidy, and priority access to PM-SVANidhi/Mudra loans.
- **Non-financial:** “Trusted Vendor” certification, marketplace/municipal procurement preferences, and expedited onboarding on aggregators and tourism/commercial directories.
- **Behavioral nudges:** pre-filled returns, auto-reminders, gamified compliance badges and local “UPI-Tax Days” for onboarding.

Safeguards and Anti-Fraud

- **High-confidence auto-tagging thresholds:** low-confidence items require vendor confirmation.
- **Anomaly detection:** pattern analytics flag suspect supplier claims (duplicate invoices, rapid invoice generation) for targeted audit (GSTN 2020).
- **Audit safe-harbour:** during pilot, no retroactive enforcement based solely on Hub data; focus on education and correction.
- **Privacy defaults:** buyer identifiers excluded unless explicit consent; limited data retention periods (Income Tax Department 2025; CBIC 2020).

Outreach and Capacity Building

- Vernacular UPI-Tax Days and agent networks to register vendors and demonstrate on-phone flows.
- DigiSaathi-style helpline and IVR/WhatsApp bots in local languages (Income Tax Department 2025).
- Developer grants/hackathons to spur low-bandwidth POS and vernacular apps (NPCI 2025)

Targeted incentives and visible, immediate gains (rebates, loan access) will be decisive in shifting behaviour from cash to recorded digital transactions.

Pilot Design and Phased Rollout

A phased rollout of the UPI-Tax Hub is important for ensuring technical stability, coordination among institutions, and trust among vendors. The initial pilot should target urban areas with high UPI use and dense small-vendor ecosystems, such as Bengaluru, Jaipur, and Surat. These cities offer scale and variety, including tech-savvy merchants, informal kirana stores, and organized small and medium enterprises. This setup allows for thorough testing of the system architecture.

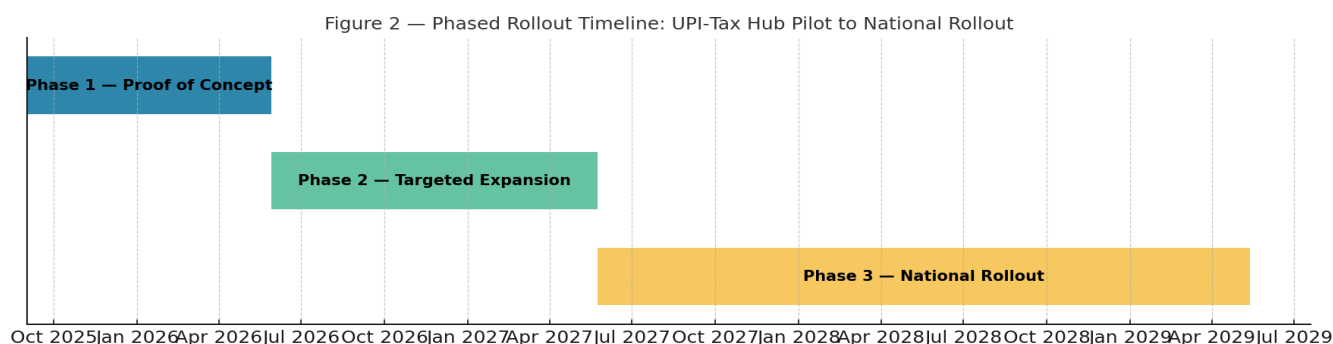


Figure 2: Phased Rollout Timeline

Phase 1 — Proof of concept (0–9 months): 50k–100k voluntarily enrolled merchants in 2–3 diverse urban/peri-urban clusters. Test auto-tagging accuracy, QR invoice capture, GSTN reconciliation, and incentives. Independent evaluator designs baseline (Income Tax Department 2025; NPCI 2025).

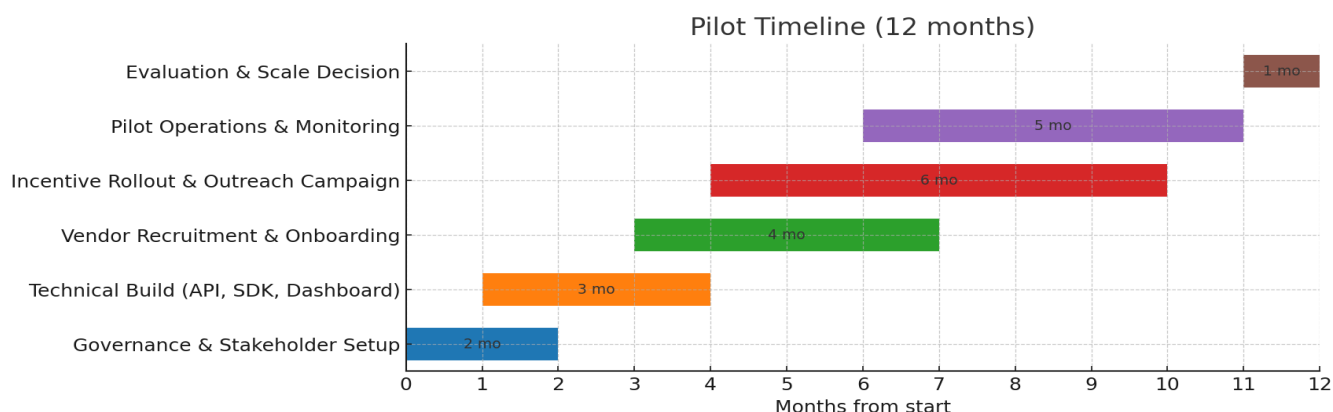


Figure 3: Pilot Development Timeline

Phase 2 — Targeted expansion (months 10–21): extend to Tier-2 cities and sectoral clusters (food services, apparel, local markets). Scale agent networks and local outreach; introduce presumptive ITC for specific supply chains.

Phase 3 — National scaling (months 22–48): conditional on pilot results, integrate Hub into standard UPI merchant onboarding and expand incentive tapering. Maintain evaluation and adjust safeguards.

Each phase includes clear M&E metrics and an independent evaluation (difference-in-differences / matched comparison) to measure filing rates, time savings, ITC validated, and credit uptake.

Revenue and Growth Projections

Using conservative adoption and elasticity assumptions (see Methods Box), the Hub can yield meaningful revenue gains in participating cohorts (NPCI 2025; GSTN 2020).

Illustrative projections (pilot cohort):

- **Conservative:** incremental ₹35,000 crore by Year 5 (gradual adoption, conservative ITC capture).
- **Optimistic:** incremental ₹70,000 crore by Year 5 (faster adoption, stronger ITC pass-through).

Savings from enforcement and audit streamlining (estimated 10–15%) further improve net fiscal benefit. These numbers are illustrative; robust M&E from the pilot is essential to refine estimates and calibrate incentives.

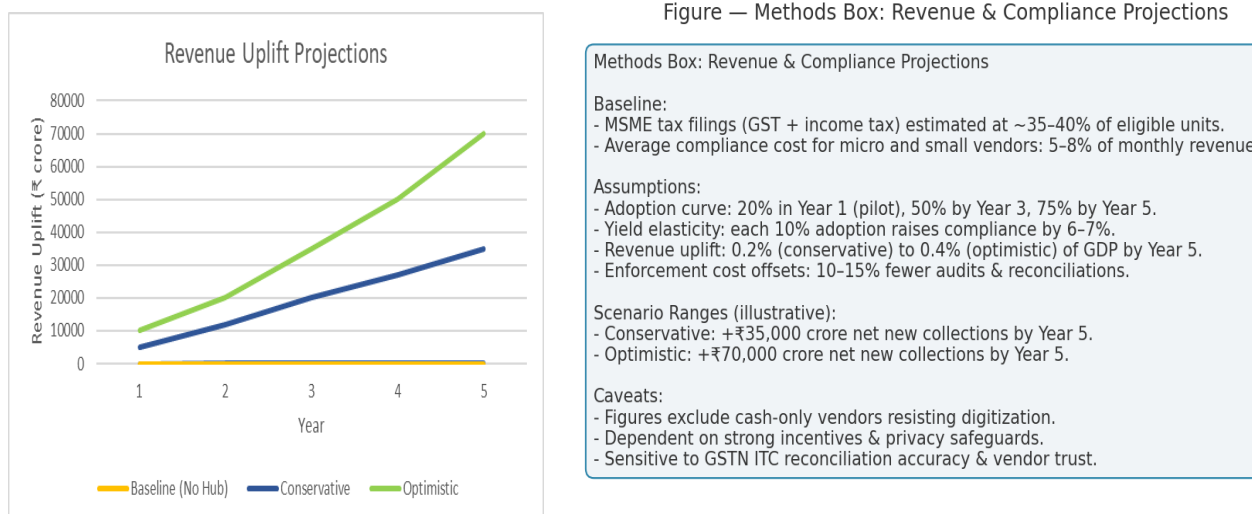


Figure 4: Revenue Projections and Method Box

Risks, Trade-Offs and Mitigation

Key risks and mitigations:

- **Low vendor adoption:** Mitigate with immediate financial rebates, device/subsidy, and strong vernacular outreach.
- **Privacy backlash:** Enforce privacy-by-design, independent oversight, and transparent reporting; limit data retention and use (Income Tax Department 2025).
- **Fraud / fake invoices:** GSTN reconciliation, anomaly detection, certified SDKs and phased audit response (GSTN 2020).

- **Operational coordination failures:** Clear steering committee, MoUs, sandboxes and defined SLAs.
- **Short-term fiscal cost of incentives:** Time-bound incentives with sunset clauses; pilot to measure ROI.
- **Cash reversion:** Use the “carrots first” approach; explicitly prohibit retroactive enforcement from Hub data during pilot.

Employing phased pilots, independent evaluation, and visible vendor benefits mitigates most trade-offs.

Monitoring, Evaluation and Indicators

- Publish an annual public M&E dashboard and use iterative learning to refine rules and incentives (Income Tax Department 2025).
- Core indicators:
 - Merchant onboarding rate, share using pre-filled returns, average time saved per filing, ITC validated amount, micro-loan uptake, vendor satisfaction index, and privacy complaint rate per 10,000 vendors.
- Evaluation design:
 - Baseline survey, matched control groups, difference-in-differences analysis, and qualitative interviews.

Policy Recommendations

1. **Pilot & evaluate:** Launch a 12-month, multi-site pilot (50k-100k merchants) under a steering committee (NPCI + MoF/CBDT) with independent evaluation.
 2. **Legal authorization:** CBDT/GSTN notify certified UPI-Tax Hubs as acceptable sources of compact e-invoice and pre-filled return data; RBI/NPCI issue operational guidance (CBIC 2020; Income Tax Department 2025).
- **Incentives:** Provide 12-month transaction-fee rebates, onboarding subsidies and priority micro-credit for pilot adopters.
 - **Privacy & oversight:** Establish an independent Privacy Ombudsmen and codify data minimization, consent and retention limits.
 - **Scale conditionally:** Expand only after pilot demonstrates net vendor benefits and fiscal gains; adopt phased mandates with technical support (GSTN 2020).

Conclusion

The UPI-Tax Hub provides a practical, India-focused way to turn the potential of real-time payments into lasting financial and developmental benefits. It reduces compliance issues and gives clear advantages to merchants, such as credit, access to markets, and lower costs. It also includes strong privacy and governance protections. This allows India to formalize commerce on a large scale without strict enforcement. A well-planned pilot program, supported by incentives and local outreach, will test ideas, build trust, and generate evidence for a national rollout. If it works, the Hub will not only broaden India's tax base and boost the resilience of MSMEs, but also serve as a model for other countries looking to connect digital payments with inclusive fiscal policy.

Many low- and middle-income countries share India's profile — high cash usage, growing smartphone access, and nascent instant-payment systems. The UPI-Tax Hub model (lightweight middleware + open APIs + incentive-led rollout) is therefore replicable in **Africa and Southeast Asia**, wherever a common payment system and tax authority can agree on standards. Key preconditions for transferability include: a robust instant payment system, a central invoice/registration database (or a plan to create one), and a political commitment to privacy-preserving governance, along with subsidies for small vendors. Pilot results from India can therefore inform regional programs and donor investments in digital fiscal infrastructure.

A carefully designed UPI-Tax Hub — paired with incentives, privacy safeguards and rigorous evaluation—can transform ubiquitous payment traces into a practical route to formalization. The approach prioritizes voluntary participation, quick merchant benefits, and evidence-based scaling, offering a replicable model for similar economies across the Global South (Banco Central do Brasil 2025; SAT n.d.; State Taxation Administration 2024).

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