E-Invoicing & SAF-T in CEE

What You Need to Know for 2026 and beyond

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KGT
Global Tax Applications

Introduction

Central and Eastern Europe is entering a decisive phase in digital tax transformation. Over the coming years, governments across the region are rolling out mandatory e-invoicing platforms and SAF-T reporting obligations designed to increase transparency, reduce VAT gaps, and align with the EU's broader digital agenda.

Key developments for 2026 include:

1 ## Bulgaria

Bulgaria introduces SAF-T reporting obligations as part of a phased compliance roadmap.

2 ## Croatia

Croatia launches mandatory B2B e-invoicing on 1 January 2026.

3 ## Poland

Poland will require all companies to issue invoices via the KSeF platform, with phased deadlines from February to April.

4 ## Moldova

Moldova will introduce of mandatory e-invoicing starting 1 October 2026.

For multinational companies - especially those operating on SAP - these changes bring both compliance challenges and opportunities to optimize tax processes. While short-term readiness will be critical to meet 2026 deadlines, a forward-looking approach can deliver long-term benefits: greater automation, improved VAT control, and a stronger tax compliance framework across multiple jurisdictions.

KGT supports companies in turning these regulatory changes into an advantage – helping you implement scalable e-invoicing solutions, streamline SAF-T reporting, and future-proof your tax processes across CEE and beyond.

Stay ahead of compliance. Turn regulatory change into a tax performance advantage.

Bulgaria

Starting 1 January 2026, Bulgaria will introduce a requirement for companies to report via the Standard Audit File for Tax (SAF-T). This measure is part of a phased implementation running until 1 January 2030, aimed at increasing tax transparency and combating tax fraud.

Phased Implementation

SAF-T reporting will become mandatory for businesses in several waves:

- **January 2026**: Large businesses with turnover exceeding 300 million BGN in 2023 or taxes and social security contributions above 3.5 million BGN.
- **January 2027**: Medium and small businesses meeting the above criteria in 2024.
- **January 2028**: All businesses with turnover exceeding 15 million BGN in 2025 or taxes and social security contributions above 1.5 million BGN.
- **January 2029**: Mandatory for all large, medium and small enterprises.
- **January 2030**: Mandatory for all VAT registered businesses.

Reporting Requirements

The Bulgarian SAF-T framework mandates three types of reports:

1. **Monthly Reports** (due by the 14th of the following month): General Ledger, Accounts Payable and Receivable, Sales and Purchase Invoices, Payments data
2. **Annual Reports** (due by June 30 of the following year): Fixed Assets
3. **On-Demand Reports:** Inventory and inventory movements

There is a six-month grace period for the first submission, during which no penalties are applied for non-compliance. Corrections can be made within six months after submission without sanctions.
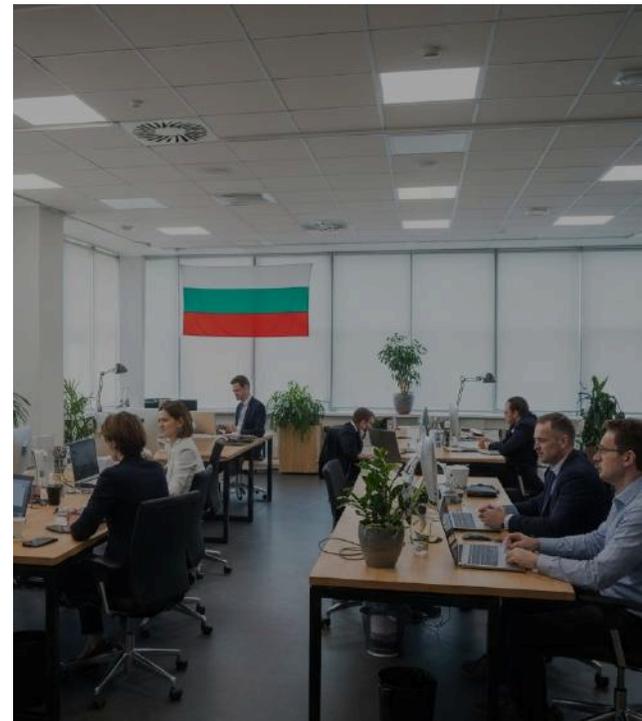
Preparation and Compliance

Companies falling under the SAF-T obligation should start preparing immediately, as the January 1, 2026 deadline is approaching rapidly. This includes mapping and validating the required data fields, assessing ERP system readiness, and implementing compliant reporting solutions. At this stage, swift action is essential, as delaying further may jeopardize timely compliance.

Need help getting ready for SAF-T in Bulgaria?

Our experts can support you in assessing your current setup, identifying data gaps, and implementing SAP-integrated reporting solutions tailored to Bulgarian requirements.

KGT can help through:
1. Our own SAP add-on, also available in the SAP store, for seamless integration; or
2. SAP DRC support for smooth digital reporting compliance

Get in touch to learn how KGT can help your organization achieve full SAF-T compliance in Bulgaria.

Croatia

Starting 1 January 2026, Croatia will introduce mandatory B2B e-invoicing and real-time e-reporting (fiscalization). This marks a major step in the country's digital tax transformation and aligns Croatia with the EU's broader objective of creating a harmonized digital tax environment.

Scope and Requirements

The new obligation applies to all VAT-registered businesses in Croatia, including non-resident entities. It requires both the issuance of structured electronic invoices and the real-time transmission of fiscal data to the Croatian Tax Authorities.

Key Features

- All domestic B2B invoices must be issued and stored electronically
- Real-time reporting becomes mandatory for all transactions
- Only invoices validated by the tax authorities will be considered legally valid
- Pre-filled VAT returns will be automatically generated for both issuers and recipients

Preparation and Compliance

Companies operating in Croatia should begin preparations immediately, as the 2026 go-live date is approaching rapidly. This includes verifying system readiness, adapting invoicing workflows, and implementing compliant e-reporting solutions. At this stage, swift action is critical, as further delay may jeopardize timely compliance and increase the risk of business disruption.
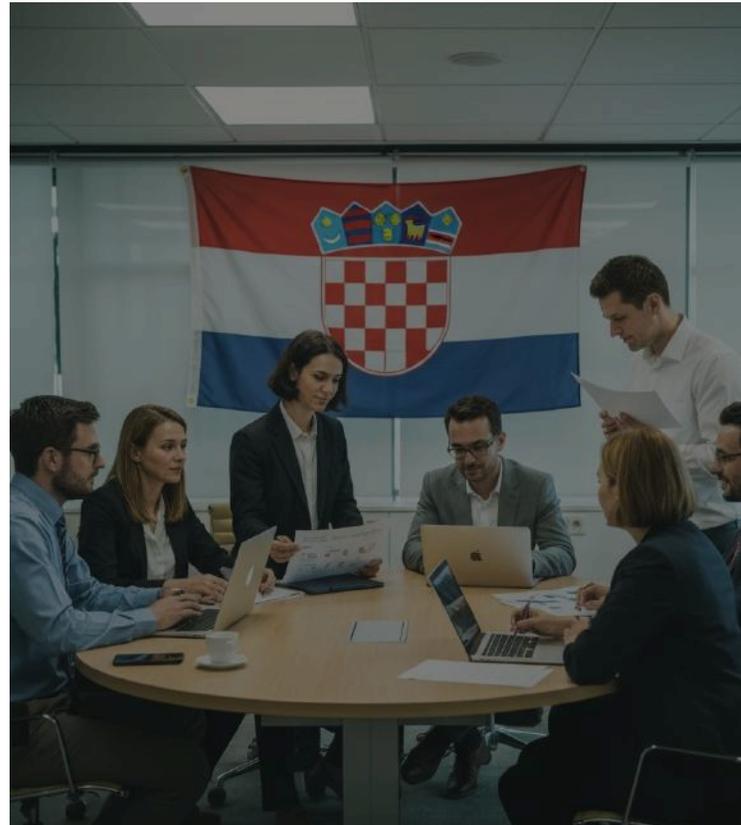
Need support preparing for e-invoicing in Croatia?

Our experts assist SAP users in meeting the new requirements.

KGT can help through:
1. Our own SAP add-on, also available in the SAP store, for seamless integration; or
2. SAP DRC support for smooth digital reporting compliance

Contact us to discuss how we can help your organization prepare for the Croatian e-invoicing mandate and real-time e-reporting (fiscalization).

Poland

Businesses operating in Poland should act now to ensure readiness for KSeF. This includes testing ERP connectivity with the KSeF 2.0 API, mapping invoice data structures, and adapting processes to meet real-time reporting requirements. Early preparation will minimize operational risks and ensure uninterrupted compliance once the mandate becomes effective.

Implementation Timeline

The mandatory rollout of KSeF will take place in several phases:

- February 1, 2026: Large businesses (annual turnover above PLN 200 million)
- April 1, 2026: All other taxpayers
- January 1, 2027: Introduction of mandatory KSeF invoice number during payments between active taxpayers
- January 2027: Micro businesses included and penalty regime becomes effective

Key Features

- The updated KSeF 2.0 API is available for public testing, allowing early system integration and validation
- A permanent "Offline24" mode enables next-day invoice reporting with split payment provisions
- E-invoices must be issued and transmitted via the national KSeF platform to be considered valid

Preparation and Compliance

On 27 August 2025, the Polish President signed the KSeF e-invoicing legislation into law, marking the completion of the legislative process. The law was published in the Dziennik Ustaw (Journal of Laws) on 1 September 2025 and entered into force the following day. With this, Poland officially confirmed the timeline for its national e-invoicing mandate under the Krajowy System e-Faktur (KSeF).

Need support with KSeF implementation?

Our team helps SAP users achieve full KSeF compliance.

1 Our own SAP add-on, also available in the SAP store, for seamless integration; or
2 SAP DRC support for smooth digital reporting compliance

Visit the SAP store: SAPStorePolandE-invoicing

Contact us to discuss how we can help your organization prepare for the Polish e-invoicing mandate.

Moldova

Moldova is moving forward with the introduction of mandatory e-invoicing (e-Factura) starting 1 October 2026. This milestone reflects the country's continued alignment with EU digital tax initiatives and mirrors developments in neighbouring Romania's e-Factura system.

Scope and Requirements

The Moldovan e-Factura system, managed by the State Tax Service (SFS), has been available on a voluntary basis since 2023 - initially for public sector suppliers and selected businesses. From October 2026 onward, the obligation will apply to all VAT-registered taxpayers, including foreign entities operating in Moldova.

Invoices must be issued, transmitted, and stored electronically via the national e-Factura platform, ensuring real-time validation, data authenticity, and secure exchange with the tax authorities.

Implementation Timeline

- 2023–2025: Voluntary phase for B2G and pilot B2B transactions
- Mid-2026: Gradual onboarding of large taxpayers
- 1 October 2026: Full go-live for all VAT-registered businesses
- 2027 onward: Potential expansion to cross-border and intra-EU transactions in line with the ViDA framework

Key Features

- Real-time invoice validation through the SFS e-Factura platform
- Structured XML format aligned with EN 16931
- Digital signature and archiving ensuring authenticity and integrity
- ERP connectivity via open APIs for automated invoice submission

Preparation and Compliance

Businesses subject to Moldovan VAT should begin preparing now to ensure readiness for the October 2026 deadline. This includes reviewing ERP capabilities, mapping invoice data to the XML structure, and testing integration with the e-Factura environment. Early preparation will help minimize disruption and ensure smooth compliance once the mandate becomes effective.

Need help preparing for e-invoicing in Moldova?

KGT supports SAP users across Central and Eastern Europe in achieving full compliance with national e-invoicing and digital reporting requirements - whether through KGT's own SAP add-ons or SAP DRC implementation support.

Contact us to discuss how we can help your organization get ready for Moldova's e-Factura mandate.

The Rest of CEE:
E-Invoicing & SAF-T Developments

Central and Eastern European countries continue to advance their digital tax compliance initiatives. While Bulgaria, Croatia, Poland and Moldova have already announced firm go-live dates for e-invoicing or SAF-T, other CEE countries are also progressing at different stages of implementation. Below is an overview of the current landscape across the region.

Czech Republic

- No mandatory B2B e-invoicing at present
- Previous fiscalization system abolished in 2023
- E-invoicing remains voluntary (buyer consent required)

Estonia

- No mandatory e-invoicing or SAF-T obligations yet
- A legislative proposal is being prepared to make e-invoicing mandatory for all business transactions
- Monitoring ViDA developments for potential future rollout

Hungary

- One of the earliest adopters of real-time invoice reporting (RTIR)
- Covers all B2B and B2C transactions
- Continuous system updates expected to extend to e-cash registers and enhanced fiscalization

Latvia

- Mandatory e-invoicing will enter into force on January 1st, 2028
- European eInvoicing standard (EN 16931) has been adopted in Latvia by public authorities

Lithuania

- SAF-T implemented since 2019 (submission on request)
- Mandatory B2G e-invoicing regime in place since July 2017
- No mandatory e-invoicing for B2B yet

Romania

- SAF-T (D406) mandatory for large taxpayers since 2022, extended to all VAT payers from 2025
- RO e-Factura mandatory for all B2B transactions since July 2024
- B2C e-invoicing and full penalty regime since January 2025

Slovakia

- B2G e-invoicing already in place via IS EFA platform
- B2B e-invoicing to start January 2027
- Cross-border transactions to follow from July 2030

Slovenia

- B2G e-invoicing is mandatory (e-SLOG format compliant with EN 16931)
- B2B e-invoicing expected to become mandatory from 2028
- Government preparing technical and legal framework

Team Expertise Spotlight

Guiding Businesses Through the CEE Digital Tax Landscape

At KGT, Lucia Nezvalova plays a key role in tracking every development within the rapidly evolving landscape of tax digitalization and electronic invoicing across Central and Eastern Europe (CEE). With more than 8 years of experience at KGT, and in her role as Head of Research & Development, she is at the forefront of innovation.

With her roots in Slovakia, Lucia has a natural pulse on what is happening across the CEE region. She continuously monitors regulatory, technical, and market developments in e-invoicing and VAT digitalization, ensuring alignment with broader European initiatives. Her deep expertise bridges both the legal and technical worlds. She supports multinational companies by translating regulatory requirements into practical, scalable solutions within SAP. Within KGT, Lucia leads various research initiatives and contributes to the development of new technology and methodologies that help companies remain compliant and future-proof in this rapidly changing regulatory landscape.

In the following interview, Lucia shares her insights on the evolution of e-invoicing and SAF-T reporting in CEE, the challenges organizations in the region are facing, and why acting now matters.

Let's start with the context.
How has e-invoicing developed in CEE?

Lucia: "Electronic invoicing has been gaining momentum in the EU since 2019, when public sector entities became legally required to receive and process e-invoices. In 2022, responsibility for digital tax initiatives moved under the *Digital Europe Programme*, which encourages EU Member States to extend e-invoicing requirements to the private (B2B) sector. In the CEE region, this shift has accelerated rapidly, driven by governments aiming for better VAT collection, reduced fraud, and more transparency in cross-border trade."

What does this mean for companies operating in CEE?

Lucia: "**For companies in Central and Eastern Europe, e-invoicing is moving from optional to a mandatory legal requirement**. The change is particularly impactful here because CEE supply chains often involve large transaction volumes and multi-country operations. Governments benefit from automated VAT reporting and real-time transaction visibility. Companies benefit from efficiency and automation, but only if they prepare early.

Furthermore, tax digitalization is not limited to e-invoicing. Many countries are also introducing SAF-T (Standard Audit File for Tax) reporting, where transactional data must be submitted to the tax authority in a predefined, structured format. In several CEE countries, SAF-T has evolved into a mandatory periodic report submitted together with VAT returns. This enables tax authorities to reconcile figures more effectively."

Can you give a few examples of this approach in CEE?

Lucia: "Countries like Poland, Romania, and Lithuania already use SAF-T extensively, and Bulgaria will make SAF-T reporting mandatory as of 1 January 2026. Hungary introduced the voluntary eVAT system which goes beyond the OECD SAF-T structure: information about underlying VAT transactions are sent to the local tax authorities in a structured format with specific VAT coding. Slovakia and Czech Republic have implemented mandatory control statements, also known as the VAT ledger.

This means some companies face a dual obligation: real-time or near-real-time e-invoicing, combined with periodic SAF-T reporting. For organizations operating across multiple CEE countries, both processes impact master data, tax determination, and ERP configuration."

Let's move on to implementation. Each country is moving at a different pace. What does this mean for implementation, and can you give an overview?

Lucia: "Yes, CEE is one of the most dynamic regions in Europe when it comes to e-invoicing, and implementation timelines differ significantly across countries. Some jurisdictions already operate mandatory e-invoicing, while others are still in the legislative or preparation phase.

E-invoicing models in CEE are evolving under the EU's focus on interoperability and standardized formats. Key models include the Four-Corner Model, which uses private service providers for invoice exchanges (like the Peppol network), and the Clearance Model, where invoices are pre-approved by tax authorities before reaching buyers. Some countries also use a Centralized Model with the government as a hub, but many are shifting towards a Four-Corner or hybrid approach to improve flexibility and efficiency.

Hungary was one of the earliest adopters with real-time reporting in 2018, followed by Romania making B2B e-invoicing compulsory in 2024. The next wave of CEE implementations is approaching quickly. Croatia, Poland and Moldova are all scheduled to go live in 2026, Slovakia is targeting 2027, and Slovenia has recently postponed its implementation to 2028. The Czech Republic is currently in the final phase of legislative discussions.

The key message is clear: companies operating across CEE must be prepared for different models, platforms and timelines. There is no single, unified approach in the region."

Can you explain what some of these terms mean? Many people assume that digital invoices and e-invoices are the same. What is the difference?

Lucia: "They are not the same, especially from a regulatory perspective. A digital invoice, such as a PDF or scanned invoice, is digital but still unstructured. An electronic invoice, is a structured data file, usually in XML, exchanged system-to-system. In CEE countries that are EU Member States, e-invoices must follow Directive 2014/55/EU and the European data standard EN 16931. To put it simple: Every e-invoice is digital, but not every digital invoice is an e-invoice."

Are formats standardized across the EU?

Lucia: "Yes, but only at a semantic level. The EU defines what information must be included, ensuring the same core elements. However, each country can choose their own technical infrastructure. In CEE, the dominant trend is the use of government-controlled platforms with real-time or near-real-time reporting. Examples include Poland's KSeF and Romania's RO e-Factura — both mandatory and fully centralized systems.

In parallel, SAF-T focuses on reporting full datasets, such as ledgers, VAT and accounting records — whereas e-invoicing focuses on individual invoice transactions. So, companies may need to manage real-time e-invoicing and periodic SAF-T reporting. Both are structured and data-driven, but they serve different purposes."

Does Peppol play a role in the CEE region?

Lucia: : "Yes, but usually not as the primary B2B e-invoicing channel. Instead, Peppol is mainly used in public procurement (B2G) or by multinational companies seeking a harmonized approach across multiple regions. Peppol typically uses UBL formats, which allow interoperability between different systems. Regardless of the approach, a Peppol network or a local governmental portal, the core requirement remains the same: the invoice must be structured, machine-readable, and automatically processed by the receiving system."

Which details must an e-invoice contain?

Lucia: "Broadly, the data in an e-invoice can be divided into two categories. First, the mandatory data elements, which include key business and tax data such as the invoice number and issue date, supplier and customer details, VAT numbers, delivery date, and a description of the goods or services including quantity and price. Second, there are optional data elements, which may include additional data such as delivery details, references to purchase or sales orders, payment references, and other contextual data that support the transaction.

In CEE jurisdictions that use a clearance model, such as Poland (KSeF) and Romania (RO e-Factura), the central platform applies technical and business-rule checks and may reject the invoice if core data are incorrect. In reporting/post-audit models, such as Hungary (real-time reporting/RTIR), poor master data still leads to failed submissions, corrections or non-compliance. Either way, high-quality master data are critical and "fix it later" approaches no longer work."

Let's dive into the impact on businesses. What are the key benefits of e-invoicing for businesses?

Lucia: "The benefits of e-invoicing go far beyond compliance. Once invoicing processes are digitized and automated, administrative effort drops dramatically; no more printing, scanning or manually entering data. Payment cycles shorten, errors decrease, and audit trails become more transparent. The risk of fraud is reduced and digital workflows lower environmental impact."

Where do organizations struggle the most?

Lucia: "The biggest challenge is fragmentation. Each country is moving at its own pace and choosing its own model and system. Some countries introduce fully centralized national government platforms, others adopt different exchange models or formats. As a result, integration into ERP systems such as SAP cannot be solved with a single, uniform approach. Many companies underestimate this complexity and still assume that e-invoicing is simply the digital sending of a PDF. In reality, e-invoicing is data-driven, structured, automated, and controlled by the tax authority. When organizations treat it as a formatting exercise instead of a fundamental process transformation, they inevitably face delays, rejected invoices, and compliance risks. Successful e-invoice implementation relies on understanding data structures, required information, official coding linkages, the impact on the system, and the overall billing process, including internal awareness and personnel training.

The challenge becomes even greater when e-invoicing and SAF-T requirements coexist, which is increasingly common across CEE. Each country sets its own e-invoicing deadlines and defines its own SAF-T file structure, meaning that companies must manage multiple reporting layers in parallel. **SAF-T is often mistakenly seen as "just another report," and e-invoicing as a simple layout change. In reality, both require deep changes to master data, tax determination and end-to-end processes.**"

If technology alone is not enough, what determines success?

Lucia: "Ultimately, it all comes down to the quality and consistency of your data."

Why is data quality so critical?

Lucia: "Because the data is submitted directly to the tax authorities in a structured, machine-readable format, companies are forced to improve data quality. **Compliance is only possible when master data is complete and correct, and tax determination works automatically and consistently throughout the entire process.** If the data is wrong, the invoice will be rejected or the SAF-T report will not reconcile. This means the company is immediately non-compliant."

What is your main advice to organizations?

Lucia: "Start early. And **don't treat e-invoicing and SAF-T files as a purely technical upgrade. It affects master data, tax determination, process flows and customer relationships.** Companies that begin preparing now can phase their rollout per country, avoid last-minute stress, and take the time to design an approach that fits their business instead of reacting to regulations under pressure. Organizations that plan ahead experience smoother projects, fewer surprises and benefit from efficiency gains long before the mandate becomes active. Also, involve the right expertise early on: someone who understands both tax requirements and system implementation. This prevents rework later in the project and ensures that the solution is future-proof, not just compliant at go-live.

Tax digitalization is coming to CEE. The only decision companies need to make is whether they want to react or be ready."

ℹ️ About Us

At KGT, we specialize in helping clients navigate the complexities of taxation and SAP. Our strong relationships with clients, employees, and partners establish us as a leading boutique consultancy firm dedicated to providing comprehensive support throughout your tax lifecycle within SAP. We ensure you have the resources you need to succeed.

As a consultancy firm focused on SAP and Tax, KGT is proud to be an SAP Build Partner, with a designated namespace 'KGT' granted by SAP. We deliver global tax solutions for organizations utilizing SAP systems. As a recognized SAP partner for PE Services, KGT is uniquely positioned to configure SAP's Document Reporting and Compliance (DRC) solutions. KGT can be found on the SAP finder: https://partnerfinder.sap.com/profile/0001925409

With SAP DRC, businesses can effectively:

· Configure and generate e-invoices and e-documents
· Analyze submissions
· Electronically submit statutory reports, including those related to indirect taxes like value-added tax (VAT)

Backed by a team of SAP-certified consultants, KGT is adept at configuring SAP DRC to meet your tax and statutory reporting requirements.

🧠 Innovative Tax Solutions

KGT is not only a long-standing official SAP Build Partner, but we also specialize in developing SAP add-ons for:

· VAT reporting
· EC listing
· e-Invoicing
· SAF-T reporting

Our solutions support comprehensive tax control frameworks, featuring capabilities such as Intrastat reporting, VAT number validation, and VAT data analytics. Our services are trusted by reputable multinational companies across Europe and beyond.

⚙️ Comprehensive Support

When your SAP VAT determination logic needs rectification, KGT is committed to providing thorough end-to-end solutions to address and remediate any underlying issues. As an expert SAP tax consultancy, we offer best-practice recommendations and implement agreed-upon solutions directly within SAP.

🌐 Our Global Reach

KGT extends its presence across a diverse range of countries, including Bulgaria, India, the Netherlands, Malaysia, Poland, Singapore, Spain, Slovakia, Turkey, and the United Arab Emirates. This global network underscores our commitment to international excellence, ensuring we are well-equipped to meet the varied needs of our clients across multiple markets.

🗨 Supported Languages

English | Turkish | Dutch | Slovak | Hindi | Polish | German

Partner with KGT to navigate the complexities of taxation and SAP, and gain the insights you need to drive your business forward.

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