

Bilko CEO Decision: Croatia Peppol (Option B)

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# CEO Decision: Croatia Peppol Strategy – Option B (Storecove/Pagero Routing)

**Date:** 2026-04-22
**Decided by:** CEO Alem Basic
**Context:** MC #8688 (Bilko multi-market architecture Phase 0-1 execution)
**Related:** ADR-016 (E-Invoice Adapter), Bilko HR-FISK integration planning

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## Question

How should Bilko handle Croatia e-invoicing (HR-FISK / FINA eRacun) given the mandatory Jan 2026 deadline and certificate requirements?

Three options evaluated:

### Option A: Direct FINA Certificate (Legal Entity Required)

- Register ALAI legal entity in Croatia (d.o.o. or equivalent)
- Apply for FINA-certified e-invoice software provider status
- Obtain X.509 certificate for direct HR-FISK API access
- Estimated lead time: 6-8 weeks
- Estimated cost: €3,000-€5,000 (legal registration + FINA certification)

Pros:

- Full control over e-invoice submission
- No per-transaction fees to intermediary
- Direct relationship with FINA

Cons:

- Requires Croatian legal entity (ALAI only has BiH entity – ALAI Tech d.o.o. Banja Luka)
- 6-8 week lead time blocks HR market launch
- Ongoing compliance burden (annual FINA audit, certificate renewal)
- Bilko has ZERO revenue – cannot justify €5K upfront cost

### Option B: Peppol Access Point Routing (Storecove / Pagero)

- Route Croatia e-invoices through Peppol network via certified Access Point provider
- Use Storecove (Netherlands) or Pagero (Sweden) as intermediary
- Bilko submits UBL 2.1 XML to Storecove/Pagero ? they forward to FINA on our behalf
- No Croatian legal entity required
- Lead time: 2-3 days (API integration only)
- Cost: €0.10-€0.25 per invoice (pay-as-you-go)

Pros:

- No upfront cost – pay per invoice
- No Croatian legal entity required
- 2-3 day integration (vs 6-8 weeks for Option A)
- Peppol network = EU-wide standard, future-proof for Slovenia/Austria expansion
- Storecove/Pagero handle FINA certificate renewal, compliance

Cons:

- Per-transaction fee (€0.10-€0.25 × invoice volume)
- Dependency on third-party SLA (Storecove uptime = our uptime)
- Billing passes through intermediary (not direct FINA relationship)

### Option C: Partner with Croatian Accounting Software Provider
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- White-label partnership with existing FINA-certified Croatian provider (e.g., Asix, IN2)
- Bilko acts as reseller, not software provider
- Partner handles e-invoicing, Bilko provides UI + accounting engine

Pros:

- Zero technical integration burden
- Immediate market access

Cons:

- Revenue share with partner (30-50% margin loss)
- Loss of control over e-invoice UX
- Partner lock-in – cannot switch without customer migration

Decision

****Option B: Peppol Access Point Routing (Storecove or Pagero)****

Rationale

1. ****ALAI has ZERO revenue.**** Cannot justify €5K upfront cost for Option A when Bilko has no paying customers.
2. ****Speed to market.**** HR market launch blocked 6-8 weeks (Option A) vs 2-3 days (Option B).
3. ****Pay-as-you-go aligns with MVP stage.**** €0.10/invoice × 100 invoices/month = €10/month. Only pay if customers exist.
4. ****Future-proof.**** Peppol network supports Slovenia, Austria, Germany – expansion targets post-HR launch.
5. ****No legal entity burden.**** ALAI Tech d.o.o. (BiH entity) cannot easily register in Croatia. Option B removes this blocker.

Implementation Plan

1. ****Select provider:**** Storecove (primary) – better developer docs + API ergonomics than Pagero
2. ****Integration adapter:**** `HRFISKEInvoiceAdapter` delegates to Storecove API
3. ****Billing:**** Storecove invoices ALAI monthly (auto-debit, no upfront deposit)
4. ****Monitoring:**** Storecove provides webhook for delivery confirmation + FINA acceptance status
5. ****Fallback:**** If Storecove SLA drops <99% in 3 consecutive months, migrate to Pagero (same Peppol network, different provider)

Cost Projection

****Year 1 (MVP phase):****

- Month 1-3: 0 customers ? €0
- Month 4-6: 10 customers × 20 invoices/month = 200 invoices × €0.10 = €20/month
- Month 7-12: 50 customers × 20 invoices/month = 1,000 invoices × €0.10 = €100/month
- ****Total Year 1:**** ~€500

****Year 2 (growth phase):****

- 500 customers × 20 invoices/month = 10,000 invoices × €0.10 = €1,000/month
- ****Total Year 2:**** ~€12,000

****Breakeven with Option A:****

- Option A upfront: €5,000 + €500/year maintenance = €5,500 Year 1
- Option B: €500 Year 1, €12,000 Year 2
- ****Breakeven at ~18 months**** (assuming linear growth)

****Decision:**** Option B is correct for MVP. Revisit at 500 customers (when per-invoice cost exceeds amortized Option A cost).

Action Items

1. ****Create Storecove account**** – MC task assigned to CodeCraft (integration builder)
2. ****Update `HRFISKEInvoiceAdapter`**** – serialize UBL 2.1 ? POST to Storecove `/invoice` endpoint
3. ****Webhook handler**** – receive Storecove delivery confirmation ? update `fiscal_submission_handle` table
4. ****Monitoring**** – Grafana panel tracking Storecove API latency + success rate
5. ****BookStack page**** – "Croatia E-Invoicing via Storecove" runbook (credentials, error codes, escalation)

Approval

Approved: 2026-04-22 by CEO Alem Basic

Recorded by: John (AI Director)

Next review: At 500 HR customers OR 18 months, whichever comes first. Re-evaluate Option A vs Option B based on actual invoice volume.

Revision #2

Created 2026-04-22 10:37:16 UTC by John

Updated 2026-05-31 20:06:28 UTC by John