Serbia — SEF e-Invoicing

Serbia — Sistem Elektronskih Faktura (SEF)

Last Updated: 2026-02-20 **Confidence Level:** HIGH (verified from official sources and regulatory updates)

Overview

Serbia operates a mandatory electronic invoicing system called SEF (Sistem Elektronskih Faktura) for all VAT-liable companies. The system requires all invoices to be transmitted through a central government platform in structured XML format.

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1. VAT/PDV Rate and Rules **[HIGH]**

Standard and Reduced Rates

- **Standard Rate:** 20% **[HIGH]** — applies to most taxable supplies
- **Reduced Rate:** 10% **[HIGH]** — applies to:
  - Basic food products
  - Medicines
  - Daily newspapers and publications
  - Public transportation services
  - Utilities
- **Zero Rate (0%): [HIGH]** — applies to:
  - Export of goods
  - Transport and other services directly related to exports
  - International air transport

Filing Frequency **[HIGH]**

- **Monthly filing:** Required for taxpayers with total annual turnover ≥ 50 million RSD
- **Quarterly filing:** Allowed for taxpayers with total annual turnover < 50 million RSD
- **Deadline:** Within 15 days of the end of each taxable period
- **Foreign businesses:** Quarterly filing expected

Tax Authority

- **Poreska Uprava Republike Srbije** (Tax Administration of the Republic of Serbia) **[HIGH]**
- VAT number format: 9 digits (e.g., 123456789)

Serbia PDV Rate Structure

```
graph TD
    PDV["PDV (VAT) — Srbija"]

    PDV --> STD["Standardna stopa<br/>20%<br/>Opšte dobavljanje<br/>Većina usluga"]
    PDV --> RED["Smanjena stopa<br/>10%<br/>Osnovna hrana<br/>Lijekovi<br/>Novine<br/>Komunalije<br/>Javni prevoz"]
    PDV --> ZERO["Nulta stopa<br/>0%<br/>Izvoz robe<br/>Međunarodni vazdušni prevoz<br/>Prateće izvozne usluge"]

    PDV --> REG["Prag registracije<br/>8.000.000 RSD<br/>godišnji promet"]
    PDV --> PAUSAL["Paušalni režim<br/>ispod 6.000.000 RSD<br/>godišnji prihodi"]

    FILING["Podnošenje PDV prijave"]
    FILING --> MONTHLY["Mjesečno<br/>promet &ge; 50M RSD<br/>rok: 15 dana nakon perioda"]
    FILING --> QUARTERLY["Kvartalno<br/>promet &lt; 50M RSD<br/>rok: 15 dana nakon kvartala"]

    style PDV fill:#c0392b,color:#fff
    style STD fill:#dc3545,color:#fff
    style RED fill:#fd7e14,color:#fff
    style ZERO fill:#198754,color:#fff
    style FILING fill:#0d6efd,color:#fff
    style MONTHLY fill:#6c757d,color:#fff
    style QUARTERLY fill:#6c757d,color:#fff
```

2. Electronic Invoicing (SEF System) **[HIGH]**

Mandatory Timeline

- **B2G (Business-to-Government):** Mandatory since **January 1, 2022 [HIGH]** — all suppliers to government entities
- **B2B (Business-to-Business):** Mandatory since **January 1, 2023 [HIGH]** — all VAT-liable companies in Serbia

Scope **[HIGH]**

All VAT-liable companies in Serbia must issue and receive e-invoices. This includes:

- Domestic businesses
- Foreign entities with fiscal representation dealing with Serbian VAT payers

Technical Format **[HIGH]**

- **XML format:** UBL 2.1 (OASIS Universal Business Language) **[HIGH]**
- **Standard compliance:** Serbian CIUS (Core Invoice Usage Specification) based on EU EN 16931 **[HIGH]**
- **Platform:** efaktura.mfin.gov.rs (Ministry of Finance platform) **[HIGH]**

Digital Certificate Requirements **[MEDIUM]**

- Qualified digital certificates required for invoice signing
- UNVERIFIED — needs verification from official SEF documentation or local accounting advisor

E-Transport (E-Delivery Notes) **[HIGH]**

NEW REQUIREMENT — 2026 onwards:

- **Phase 1:** January 1, 2026 — mandatory for:
  - Public sector
  - Carriers
  - Excise goods flows
- **Phase 2:** October 1, 2027 — full private-to-private coverage
- **Format:** UBL 2.1 XML (same as e-invoicing)

- **Platform:** Central government platform (similar to SEF)

SEF E-Invoicing Flow

```
sequenceDiagram
    participant BILKO as Bilko
    participant CERT as Digitalni Sertifikat<br/>(Qualified CA)
    participant SEF as efaktura.mfin.gov.rs<br/>(Ministry of Finance)
    participant BUYER as Kupac (Buyer)
    participant PURS as Poreska Uprava<br/>(Tax Administration)

    Note over BILKO,PURS: B2B mandatory since 01.01.2023

    BILKO->>BILKO: Kreirati fakturu<br/>UBL 2.1 XML format
    BILKO->>BILKO: Validirati EN 16931<br/>Serbian CIUS compliance
    BILKO->>CERT: Potpisati XML<br/>(Qualified digital signature)
    CERT-->>BILKO: Potpisana faktura

    BILKO->>SEF: POST /api/publicApi/salesInvoices<br/>(signed UBL 2.1 XML)
    SEF->>SEF: Validacija formata<br/>i sertifikata

    alt Validacija uspješna
        SEF-->>BILKO: 200 OK + invoiceId<br/>(SEF internal ID)
        SEF->>BUYER: Notifikacija o novoj fakturi
        BUYER->>SEF: GET /api/purchaseInvoices/:id<br/>(preuzimanje fakture)
        SEF-->>BUYER: UBL 2.1 XML faktura
        BUYER->>BUYER: Procesiranje fakture
        BUYER->>SEF: Potvrda prijema (opciono)
        SEF->>PURS: Real-time reporting<br/>(porezni podaci)
    else Validacija neuspješna
        SEF-->>BILKO: 400 Bad Request<br/>(greška validacije)
        BILKO->>BILKO: Ispraviti fakturu i pokušati ponovo
    end

    Note over BILKO,PURS: Čuvanje 10 godina<br/>Dostupno za poreznu kontrolu
```

3. Chart of Accounts Standard **[HIGH]**

Legal Framework

- **Governing Law:** Law on Accounting (Zakon o računovodstvu) **[HIGH]**
- **Framework:** Kontni Okvir (Chart of Accounts Framework) **[HIGH]**
- **Official Publication:** Službeni glasnik RS No. 95/2014 **[HIGH]**

Structure **[MEDIUM]**

The Serbian Chart of Accounts follows a class-based structure typical of Balkan accounting systems:

- **Class 0:** Long-term assets (Stalna imovina)
- **Class 1:** Current assets (Obrtna imovina)
- **Class 2:** Short-term liabilities (Kratkoročne obaveze)
- **Class 3:** Capital/Equity (Kapital)
- **Class 4:** Long-term liabilities (Dugoročne obaveze)
- **Class 5:** Expenses (Rashodi)
- **Class 6:** Revenue (Prihodi)
- **Class 7:** Cost/Gains-Losses (Troškovi/Dobici-Gubici)
- **Class 8:** Off-balance sheet (Vanbilansna evidencija)
- **Class 9:** Internal accounting

Requirement **[HIGH]**

- All legal persons must record business changes in accounts prescribed by the Chart of Accounts (Article 14, Accounting Law)
- All transactions, books, and reports must be in Serbian language
- Serbian Chart of Accounts must be the primary chart

Serbia Kontni Okvir — Class Hierarchy

```
graph TD
    KO["Kontni Okvir Srbije<br/>(Chart of Accounts Framework)<br/>Zakon o računovodstvu<br/>Sl. glasnik RS br. 95/2014"]

    KO --> BS_SIDE["Bilans Stanja (Balance Sheet)"]
```

```
    KO --> PL_SIDE["Bilans Uspjeha (P&L)"]

    BS_SIDE --> CL0["Klasa 0: Stalna imovina<br/>020 Građevinski objekti<br/>021 Mašine i uređaji<br/>023 Računari<br/>[DEBIT]"]
    BS_SIDE --> CL1["Klasa 1: Obrtna imovina<br/>120 Potraživanja od kupaca<br/>140 Novac u banci<br/>141 Blagajna<br/>[DEBIT]"]
    BS_SIDE --> CL2["Klasa 2: Kratkoročne obaveze<br/>210 Dobavljači<br/>240 PDV za uplatu<br/>241 Porez na dohodak<br/>[KREDIT]"]
    BS_SIDE --> CL3["Klasa 3: Kapital<br/>300 Osnovna kapital<br/>330 Neraspoređena dobit<br/>340 Dobit/gubitak<br/>[KREDIT]"]
    BS_SIDE --> CL4["Klasa 4: Dugoročne obaveze<br/>400 Dugoročni krediti<br/>420 Rezervisanja<br/>[KREDIT]"]

    PL_SIDE --> CL5["Klasa 5: Rashodi<br/>510 Troškovi zarada<br/>530 Amortizacija<br/>540 Zakupnina i komunalije<br/>[DEBIT]"]
    PL_SIDE --> CL6["Klasa 6: Prihodi<br/>600 Prihodi od prodaje robe<br/>601 Prihodi od usluga<br/>610 Izvozni prihodi (0% PDV)<br/>[KREDIT]"]
    PL_SIDE --> CL7["Klasa 7: Troškovi<br/>(Cost Accounting)<br/>70 Troškovi prodane robe<br/>71 Troškovi prodanih usluga<br/>[DEBIT]"]

    style KO fill:#c0392b,color:#fff
    style BS_SIDE fill:#0d6efd,color:#fff
    style PL_SIDE fill:#198754,color:#fff
    style CL0 fill:#198754,color:#fff
    style CL1 fill:#198754,color:#fff
    style CL2 fill:#dc3545,color:#fff
    style CL3 fill:#6f42c1,color:#fff
    style CL4 fill:#dc3545,color:#fff
    style CL5 fill:#fd7e14,color:#fff
    style CL6 fill:#0d6efd,color:#fff
    style CL7 fill:#6c757d,color:#fff
```

4. Record Keeping Requirements **[HIGH]**

Retention Period **[HIGH]**

- **10 years** for all accounting records:
  - Daily cash transactions
  - Business books
  - Accounting documents
  - VAT records

Electronic Storage **[HIGH]**

- **Allowed:** Yes, electronic storage is permitted
- **Requirement:** Records must be kept in the **original form** in which they were created
- **Compliance:** Must follow Law on Electronic Documents and related bylaws
- **Qualified System Required:** Electronic archiving must guarantee:
  - Authenticity
  - Reliability
  - Integrity
  - Usability

Audit Trail **[HIGH]**

- E-invoices must remain accessible to Tax Authorities for audit purposes for the full 10-year retention period

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5. MVP Impact Assessment

MVP-CRITICAL (Must Have for Legal Operation)

1. **SEF Integration [HIGH PRIORITY]**
   - UBL 2.1 XML invoice generation
   - API integration with efaktura.mfin.gov.rs platform
   - Real-time invoice transmission
   - Digital certificate handling
2. **PDV (VAT) Calculation [HIGH PRIORITY]**
   - Support for 20% standard, 10% reduced, 0% export rates
   - Automatic VAT calculation on transactions
   - VAT report generation for monthly/quarterly filing
3. **Serbian Chart of Accounts [HIGH PRIORITY]**
   - Predefined Serbian Kontni Okvir structure (Classes 0-9)
   - Mapping of transactions to correct account codes
   - Support for Serbian language in accounting records

4. **Electronic Record Storage [HIGH PRIORITY]**
    - 10-year retention capability
    - Original format preservation
    - Audit trail for all transactions
    - Export functionality for tax authority audits

FUTURE (v2 or Later)

1. **E-Transport (E-Delivery Notes) [MEDIUM PRIORITY]**
    - Not critical for initial MVP (Phase 1 begins Jan 2026)
    - Required only for:
        - Companies selling to public sector
        - Logistics/carrier companies
        - Excise goods (alcohol, tobacco, fuel)
    - Can be added when targeting these segments
2. **Advanced VAT Features [LOW PRIORITY]**
    - Reverse charge mechanism
    - Cross-border VAT (intra-EU supplies)
    - Tax exemption handling for specific sectors
3. **Multi-Currency Support [LOW PRIORITY]**
    - Initial MVP can focus on RSD (Serbian Dinar) only
    - Foreign currency transactions can be added later

Implementation Notes for Bilko

Critical Path

1. **SEF XML Generation Engine:** Core requirement — without this, invoices are not legally valid
2. **Digital Certificates:** Must acquire qualified certificates for invoice signing — partner with local CA (Certification Authority)
3. **Platform API:** Study efaktura.mfin.gov.rs API documentation — may require Serbian language documentation
4. **Local Testing:** Must test with Serbian Tax Administration sandbox before production

Risks

- **Language Barrier:** Official documentation likely in Serbian only
- **Certificate Complexity:** Qualified digital certificates may require local company registration

- **API Availability:** Government API reliability may vary
- **Compliance Changes:** Regulations updated frequently — need monitoring system

Recommendation

Hire local Serbian accounting advisor for:

- Verification of all technical requirements
- Digital certificate acquisition process
- Sandbox testing coordination
- Ongoing compliance monitoring

Sources

- Serbia E-Invoicing & Archiving Rules | Basware
- Serbia's E-invoicing and E-transport Requirements Explained | Ecosio
- All About B2B E-Invoicing in Serbia | DDDInvoices
- Serbia VAT Guide | Fonoa
- Serbia VAT Guide for Businesses in 2026 | Quaderno
- Law on Accounting - Republic of Serbia | Paragraf
- Electronic Archiving in Serbia | AVS Legal
- Serbia Tax Administration | PURS

Revision #4
Created 2026-02-23 10:48:12 UTC by John
Updated 2026-07-05 20:02:38 UTC by John