

# Business Requirements Document (BRD)

## Business Requirements Document (BRD): Bilko

“ **Project:** Bilko — Balkan Accounting SaaS **Version:** 0.1 **Date:** 2026-02-23  
**Author:** John (AI Director) **Status:** Draft **Reviewers:** Alem Bašić (CEO)

### Document History

Version	Date	Author	Changes
0.1	2026-02-23	John (AI Director)	Initial draft — Phase 1 Serbia focus

## 1. Executive Summary

**Project Overview:** Bilko is a cloud SaaS accounting platform for Balkan SMBs — the first modern, cloud-native tool purpose-built for Serbian, Bosnian, and Croatian small businesses with full local tax compliance, native language support, and affordable pricing. Phase 1 targets Serbia (300K+ active SMBs) where e-invoicing via SEF has been mandatory since 2023.

**Business Problem:** 348,000+ Balkan SMBs have no affordable, modern, cloud-native accounting tool with full local regulatory compliance — they are forced to choose between over-engineered ERP software (Pantheon, Minimax at €150+/month), global tools with no Balkan compliance (QuickBooks/Xero), or manual spreadsheets that violate SEF e-invoicing law.

**Proposed Solution:** Bilko — a Fiken-inspired SaaS at €8-25/month with SEF e-invoicing, PDV auto-calculation, double-entry bookkeeping, bank reconciliation, and financial reports in Serbian/Bosnian/Croatian.

## Expected Outcomes:

- 100 paying organizations within 90 days of Serbia launch
- €500 MRR by end of Month 3 post-launch
- 80% activation rate (users create their first invoice within 7 days)
- Full SEF compliance for all invoices submitted through Bilko

**Investment:** €11,000-17,000 EUR | **Timeline:** ~10 weeks to Serbia launch | **Priority:** High — CEO GO decision 2026-02-20

## 2. Business Objectives & Goals

ID	Objective	Description	Target	Timeframe
BO-01	Launch compliant Serbia product	Deliver a fully SEF-compliant invoicing and accounting platform for Serbian SMBs	Production launch with 0 critical compliance bugs	2026-05-01
BO-02	Acquire first paying customers	Onboard 100 paying organizations in Serbia within 90 days of launch	100 orgs × avg €15/month	By 2026-08-01
BO-03	Achieve product-market fit signals	Reach NPS > 50 and < 5% monthly churn among early adopters	NPS ≥ 50, churn ≤ 5%/month	60 days post-launch
BO-04	Establish Balkan market position	Launch Croatia by Q4 2026, establish Bilko as the leading Balkan cloud accounting brand	Croatia beta by 2026-10-01	2026-10-01
BO-05	Generate ARR for ALAI	Bilko becomes a revenue pillar for ALAI Holding, reducing consulting dependency	€50K ARR by 2026-12-31	2026-12-31

### Alignment to Strategic Goals:

- **ALAI product portfolio:** Bilko is ALAI's first B2B SaaS product — validates the product-building capability and creates recurring revenue
- **Balkan market expansion:** Bilko establishes ALAI's brand and infrastructure in Serbia, Croatia, and BiH for future products

# 3. Current State Analysis (AS-IS)

## 3.1 Current Process Overview

A typical Serbian SMB owner currently manages accounting through one of three workflows:

1. **Pantheon/Minimax desktop software** — installed locally, managed by an accountant, significant monthly cost (€100-200+), complex interface
2. **Manual spreadsheet + paper invoices** — technically illegal post-2023 SEF mandate; exposes business to fines
3. **Outsourced accountant only** — accountant submits SEF invoices manually; owner has no real-time visibility into finances

None of these provide: (a) real-time cloud access, (b) affordable self-service, or (c) simple enough UX for non-accountants.

## 3.2 AS-IS Process Flow

flowchart LR

```
A([SMB Owner]) --> B[Create invoice in Excel/Word]
B --> C{SEF registered?}
C -->|Yes| D[Export to SEF format manually]
C -->|No| E[Send paper/PDF invoice – non-compliant]
D --> F[Submit to efaktura.gov.rs portal]
E --> G[Risk of fine: up to 500K RSD]
F --> H[Track payment manually in spreadsheet]
H --> I[Send data to accountant monthly]
I --> J[Accountant reconciles, prepares PDV report]
J --> K[Submit PDV to Poreska Uprava – 15th of month]
```

## 3.3 Current Systems & Tools

System / Tool	Purpose	Users	Limitations
Pantheon ERP	Full accounting + SEF	Mid-market SMBs	Complex UI, high cost (~€150+/month), desktop-only
Minimax	Accounting + invoicing	Accountants managing multiple clients	Older architecture, no mobile, limited cloud

System / Tool	Purpose	Users	Limitations
efaktura.gov.rs portal	SEF e-invoice submission	All businesses (manual)	Manual only, no API for small software
Excel / Google Sheets	Expense tracking, reconciliation	Micro-businesses	Non-compliant, error-prone, no audit trail
Paper invoices	B2C / informal invoicing	Retail / services	Illegal for B2B from 2023

## 3.4 Current State Pain Points

#	Pain Point	Category	Affected Users	Business Impact	Severity
PP-01	SEF compliance is time-consuming without dedicated software	Process	All B2B SMBs in Serbia	1-2 hours per invoice in manual workflow; fine risk	High
PP-02	Existing solutions (Pantheon) cost as much as a part-time salary	Technology	Budget-constrained SMBs	80% of SMBs cannot justify >€50/month	High
PP-03	No local language + local compliance in affordable tools	Technology	Non-English speakers	QuickBooks/Xero require English + have no SEF	High
PP-04	Accountants cannot manage multiple clients from one platform	Process	Bookkeepers	2-3 hours/client/month in manual reconciliation	Medium
PP-05	No real-time financial visibility for business owners	Data	SMB owners	Decisions made on stale monthly reports	Medium
PP-06	Multi-currency transactions (BAM, EUR, RSD) managed manually	Data	Import/export businesses	Exchange rate errors in VAT calculations	Medium

## 3.5 Current State Metrics (Baseline)

Metric	Current Value	Source	Notes
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Time to create + submit SEF invoice (manual)	45-90 minutes	User research	Includes portal navigation
Time to create + submit SEF invoice (Bilko target)	< 5 minutes	Product target	Wizard + auto-submit
Monthly software cost for compliant accounting	€100-200+ (Pantheon)	Market research	For Serbian SMB
Bilko target price	€8-25/month	Pricing model	4-20× cheaper than incumbents
SMBs currently non-compliant with SEF	~60% of eligible	APR estimates	Regulatory enforcement risk

## 4. Future State Vision (TO-BE)

### 4.1 Future State Description

With Bilko, a Serbian SMB owner opens their browser, creates a compliant e-invoice in under 5 minutes (including line items, PDV, multi-currency), and submits it directly to SEF without touching the government portal. Expenses are categorized automatically. Bank statements are imported via CSV and matched to transactions. At month end, the PDV report is generated in one click and exported in the format required by Poreska Uprava. The owner has real-time P&L, cash flow, and balance sheet visibility from any device.

### 4.2 TO-BE Process Flow

flowchart LR

```

A([SMB Owner]) --> B[Open Bilko – Create Invoice]
B --> C[Select client, add items, auto-PDV]
C --> D[One-click: Email PDF + submit to SEF]
D --> E[SEF confirms – status updated in Bilko]
E --> F[Invoice marked Sent/Paid automatically]
F --> G[Double-entry transaction auto-created]
G --> H[Dashboard updates P&L + cash flow]
H --> I[Month end: 1-click PDV report export]
I --> J([Owner files PDV in < 10 minutes])

```

### 4.3 Key Improvements

Area	AS-IS	TO-BE	Improvement
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Time to create + submit SEF invoice	45-90 min	< 5 min	90% time reduction
Monthly accounting software cost	€100-200+	€8-25	4-20× cheaper
Real-time financial visibility	Monthly (accountant)	Instant	Continuous
SEF compliance rate	~40% (market average)	100% for Bilko users	Compliance guaranteed
PDV report preparation	2-4 hours/month	< 10 minutes	95% time reduction

# 5. Market Analysis & Competitive Landscape

## 5.1 Market Context

The Balkan region has 348,000+ active SMBs across Serbia (300K+), Croatia (140K+), and Bosnia-Herzegovina (~80K VAT-registered). The 2023 Serbian SEF mandate and January 2026 Croatian eRačun mandate create regulatory forcing functions that are driving digital adoption at a pace not seen since SEPA in Western Europe. The €50-150M TAM is currently served by legacy ERP vendors (Pantheon, Minimax) who have not modernized their UX or pricing to match the SMB segment.

## 5.2 Competitive Analysis

Competitor	Solution Type	Key Features	Pricing	Our Advantage
Pantheon	ERP (direct)	Full accounting, SEF, inventory, payroll	€150-300+/month	Bilko is 6-20× cheaper; Fiken-simple UX; cloud-native
Minimax	Accounting SaaS (direct)	Invoicing, accounting, SEF support	€50-100/month	Bilko has better UX; lower price; modern stack
QuickBooks	Global SaaS (indirect)	Full accounting, mobile, 700+ integrations	€30-50/month	Bilko has SEF/eRačun; local language; local currency
Xero	Global SaaS (indirect)	Full accounting, bank feeds, multi-currency	€35-55/month	Bilko has Balkan compliance; cheaper for basic use
Manual + Excel	Substitute (indirect)	Free	Free	Bilko is affordable + compliant; fines avoided

## 5.3 Positioning

**Unique Value Proposition:** The only cloud accounting software built for Balkan SMBs — with local language, local tax compliance (SEF, eRačun, PDV), and Fiken-level UX simplicity at €8-25/month. **Target Market:** Serbian SMBs (Phase 1) → Croatian SMBs (Phase 2) → BiH SMBs (Phase 3) **Differentiators:** Local compliance out-of-the-box · Native languages · Affordable SaaS model · Modern cloud UX · Double-entry with Balkan Chart of Accounts

## 6. Stakeholder Needs Analysis

Stakeholder Group	Primary Needs	Secondary Needs	Pain Points Addressed	Priority
SMB Owner (non-accountant)	Create SEF invoices fast; see P&L; file PDV easily	Mobile access; expense receipts; client management	PP-01, PP-02, PP-03, PP-05	High
Bookkeeper / Accountant	Manage multiple client orgs; export VAT reports; double-entry accuracy	Client collaboration tools; bulk operations	PP-04, PP-05	High
Import/export business	Multi-currency invoices (EUR, BAM, RSD); exchange rate locking	Currency reports; consolidated P&L in base currency	PP-06	Medium
Tech-savvy early adopter	REST API; webhook notifications; data export	CSV/JSON export; OAuth integration	—	Low

## 7. Business Requirements

ID	Requirement	Description	Priority	Rationale	Source	BO Reference
BR-001	SEF e-invoice submission	System must create, sign, and submit e-invoices to efaktura.gov.rs (SEF) in UBL 2.1 format	Must Have	Serbia launch blocker; legal requirement since 2023	Regulatory research + APR	BO-01

ID	Requirement	Description	Priority	Rationale	Source	BO Reference
BR-002	PDV auto-calculation (Serbia)	System auto-calculates 20% standard and 10% reduced PDV on all invoice line items	Must Have	Core tax compliance; manual calculation error-prone	Regulatory research	BO-01
BR-003	Double-entry bookkeeping	Every financial event generates a balanced debit + credit entry per Balkan GAAP standards	Must Have	Required for legal compliance and Balance Sheet accuracy	Accounting law	BO-01
BR-004	Multi-currency support	System handles BAM, RSD, EUR, USD with exchange rate locking at transaction date	Must Have	Balkan businesses transact in multiple currencies	User research	BO-01, BO-02
BR-005	Bank statement import	System accepts CSV uploads from Serbian banks for transaction reconciliation	Must Have	Live bank API not available in Phase 1; manual reconciliation is blocking pain	User research	BO-02
BR-006	Financial reports	System generates P&L, Balance Sheet, Cash Flow Statement, and VAT/PDV report	Must Have	Required for business owners and accountants; PDV report needed for monthly filing	User research	BO-03
BR-007	Multi-user collaboration with RBAC	Organizations can invite multiple users with roles: Owner, Admin, Accountant, Viewer	Must Have	Accountants need access to client orgs; business owners need to control what accountants see	User research	BO-02, BO-03

<b>ID</b>	<b>Requirement</b>	<b>Description</b>	<b>Priority</b>	<b>Rationale</b>	<b>Source</b>	<b>BO Reference</b>
BR-008	PDF invoice generation + email delivery	System generates professional PDF invoices with Bilko/client branding and delivers via email	Must Have	Standard B2B invoicing requirement	User research	BO-02
BR-009	Expense tracking	System records expenses with category, amount, payment method, and receipt photo	Must Have	Core accounting requirement; feeds P&L and cash flow	User research	BO-02
BR-010	Chart of Accounts (Balkan GAAP)	System provides pre-populated Serbian/Balkan Chart of Accounts per Pravilnik 2021	Must Have	Required for legal compliance and proper financial reporting	Regulatory research	BO-01
BR-011	Serbian language support	All UI, invoices, and reports available in Serbian (Latin and Cyrillic)	Must Have	Target market speaks Serbian; global tools fail here	User research	BO-02
BR-012	Immutable audit trail	System logs all financial actions with user, timestamp, before/after values; append-only	Must Have	Required by Serbian accounting law; non-negotiable	Regulatory research	BO-01
BR-013	Data export (GDPR-aligned)	Users can export all their organization's data in machine-readable format	Must Have	GDPR Article 20 portability; user trust	Legal	BO-01

ID	Requirement	Description	Priority	Rationale	Source	BO Reference
BR-014	Secure multi-tenancy	Each organization's data is completely isolated; no cross-tenant data access	Must Have	Financial data confidentiality ; SaaS security baseline	Security	BO-01
BR-015	Croatian eRačun integration	System submits e-invoices to HR-FISK (FINA) in Croatian format	Should Have	Croatia Phase 2; eRačun mandatory Jan 2026	Regulatory research	BO-04
BR-016	Bosnian/Croatian language support	Full UI and invoice support in Bosnian and Croatian	Should Have	Phase 2 expansion markets	User research	BO-04
BR-017	AI-assisted bookkeeping	System suggests expense categories and transaction classifications	Could Have	Reduces manual entry; competitive differentiator	Market research	BO-05
BR-018	Payroll management	Track employee salaries, generate payroll documents	Won't Have (Phase 1)	Complexity high; Phase 2 feature	Strategic decision	—

## 8. Success Metrics & KPIs

ID	KPI	Category	Baseline	Target	Measurement Method	Evaluation Date	Owner
KPI-01	Paying organizations	Revenue	0	100 orgs by Day 90	Billing system	90 days post-launch	John
KPI-02	Monthly Recurring Revenue	Revenue	€0	€500 MRR by Month 3	Billing system	3 months post-launch	Alem

ID	KPI	Category	Baseline	Target	Measurement Method	Evaluation Date	Owner
KPI-03	Activation rate	Adoption	0%	≥ 80% create invoice in 7 days	Analytics	Monthly	John
KPI-04	Monthly churn	Retention	N/A	≤ 5%/month	Billing system	Monthly	John
KPI-05	NPS score	Satisfaction	N/A	≥ 50	In-app survey	60 days post-launch	John
KPI-06	SEF submission success rate	Compliance	N/A	100%	SEF API response logs	Launch day + ongoing	John
KPI-07	System uptime	Reliability	N/A	≥ 99.9% monthly	Monitoring	Ongoing	John
KPI-08	Page load time (subsequent)	Performance	N/A	< 1 second p95	Lighthouse + monitoring	Launch + 30 days	John
KPI-09	Time to create first invoice	UX	45-90 min (incumbent)	< 5 minutes in Bilko	In-app analytics	Post-launch	John

## 9. Business Rules & Constraints

### 9.1 Business Rules

ID	Rule	Category	Source	Enforced By
RUL-01	All monetary amounts stored as NUMERIC(19,4) — NEVER float	Financial	Internal engineering standard	Database schema + Prisma
RUL-02	Every financial transaction must generate balanced debit + credit entries	Financial	Serbian Accounting Law	Application layer + DB constraint
RUL-03	Exchange rate locked at transaction date — cannot be edited retroactively	Financial	Accounting standards (IFRS)	Database immutability + LoggedAction

ID	Rule	Category	Source	Enforced By
RUL-04	LoggedAction table is append-only — no deletes, no updates	Legal/Audit	Serbian accounting law (document retention)	Database constraint + application
RUL-05	SEF invoice numbers must follow Serbian sequential numbering format	Legal	APR / SEF specification	Invoice numbering service
RUL-06	PDV rate applied based on organization's country + product/service category	Tax	Serbian Tax Law (Zakon o PDV)	VAT calculation engine
RUL-07	Financial data must be retained for minimum 10 years (Serbia), 11 years (Croatia)	Legal	Local accounting laws	Data retention policy
RUL-08	Organizational data is strictly scoped — no cross-tenant queries permitted	Security	Multi-tenancy design	Organization-scoped middleware

## 9.2 Regulatory & Compliance Requirements

Regulation	Applicability	Requirements	Responsible
Zakon o elektronskom fakturisanju (Serbia)	Yes — mandatory B2B since 2023	SEF e-invoice submission; UBL 2.1 XML; digital signatures	John (Tech Lead)
Zakon o PDV (Serbia)	Yes	20% standard, 10% reduced PDV; monthly filing by 15th	John + Asmir
Zakon o računovodstvu (Serbia)	Yes	Double-entry; 10-year document retention; annual balance sheet	John + Asmir
GDPR (EU-adjacent)	Yes — applies to data of EU citizens and ALAI Holding AS (Norway)	Data minimization, right to deletion, DPA, 72h breach notification	John + Alem
Croatian Zakon o fiskalizaciji (Phase 2)	Future	eRačun (HR-FISK/FINA) submission; 25% VAT; 11-year retention	Phase 2
BiH PDV regulations (Phase 3)	Future	17% PDV; CPF e-invoice (expected 2027)	Phase 3

## 9.3 Technical Constraints

- Must integrate with: SEF API (efaktura.gov.rs) — REST/UBL 2.1
- Must support: Chrome 100+, Firefox 100+, Safari 16+, Edge 100+ (desktop + mobile)
- Must run on: Cloud infrastructure (no on-premises requirement)
- All monetary arithmetic: NUMERIC(19,4) — no float/number types for currency
- Monorepo structure: Turborepo — cannot deviate from established Next.js + Express stack without ADR
- Database: PostgreSQL via Prisma — no ORM substitution

# 10. Assumptions & Dependencies

## 10.1 Assumptions

#	Assumption	Risk if False	Validation Owner
A-01	SEF API (efaktura.gov.rs) sandbox is available for development testing	Integration delayed 4-6 weeks	John / Asmir
A-02	No software certification required by Serbian tax authority for MVP launch	Compliance blocker; launch delayed	Asmir (legal research)
A-03	UBL 2.1 XML format accepted by SEF for all invoice types in Phase 1	Invoice engine rework required	John
A-04	€11-17K budget sufficient for Phase 1 MVP	Scope reduction required	Alem + John
A-05	Beta testers (5 SMBs + 3 accountants) can be recruited through Asmir's network	Beta delayed; less feedback	John + Asmir

## 10.2 Dependencies

#	Dependency	Type	Impact if Unavailable	Target Date	Status
DEP-01	SEF API sandbox access credentials	External (APR)	Cannot develop/test e-invoicing	2026-03-01	Pending
DEP-02	ALAI Tech d.o.o. Serbia registration	External (government)	Cannot legally operate in Serbia	2026-04-01	In progress

#	Dependency	Type	Impact if Unavailable	Target Date	Status
DEP-03	Exchange rate API selection (ECB / fixer.io)	Internal decision	Multi-currency features incomplete	2026-03-07	Open
DEP-04	Beta tester recruitment	External	Beta phase delayed	2026-03-28	Open
DEP-05	bilko.rs + bilko.io domain SSL setup	External (registrar)	Cannot launch production	2026-04-14	Open

# 11. ROI Analysis / Cost-Benefit

## 11.1 Investment Summary

Cost Category	One-Time (EUR)	Annual (EUR)	Notes
Development (Phase 1)	€12,000	—	Includes backend + frontend + DevOps
Infrastructure (Year 1)	€1,200	€1,200	Cloud hosting, CDN, monitoring
Third-party APIs + services	€800	€500	SEF, exchange rate, email
Design + branding	€1,500	—	Landing page, invoice templates
<b>Total Year 1</b>	<b>€15,500</b>	<b>€1,700</b>	Within €17K ceiling

## 11.2 Benefit Projections

Benefit	Year 1 (EUR)	Year 2 (EUR)	Year 3 (EUR)	Confidence
SaaS subscription revenue (Serbia)	€18,000	€42,000	€72,000	Medium
Additional revenue (Croatia + BiH)	—	€15,000	€45,000	Low
Total Revenue	€18,000	€57,000	€117,000	Medium

## 11.3 ROI Summary

Metric	Value
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Total Phase 1 Investment	€17,000
Net Benefit Year 1	€18,000 - €1,700 = €16,300
Payback Period	~12-14 months (post-launch)
3-Year ROI	~800%
3-Year NPV (discount rate: 10%)	~€140,000

## 12. Implementation Roadmap

Phase	Description	Key Deliverables	Duration	Success Criteria
Phase 1 — Serbia MVP	Core accounting + SEF e-invoicing	50 API endpoints, 8 frontend modules, SEF integration	10 weeks	100 paying orgs in 90 days; 100% SEF success rate
Phase 2 — Croatia	eRačun integration + HR-FISK	Croatian locale, 25% VAT, eRačun submission	8 weeks	Croatia beta by Q4 2026
Phase 3 — BiH	BiH PDV + CPF (when available)	Bosnian locale, 17% PDV, CPF integration	6 weeks	BiH beta by Q2 2027
Phase 4 — Enhancement	Payroll, AI bookkeeping, API	Payroll module, AI suggestions, public API	Ongoing	Reduce churn; increase ARPU

## 13. Risk Assessment

#	Risk	Probability	Business Impact	Mitigation
BR-R01	SEF API instability at launch	Medium	Critical — users cannot submit invoices	Abstract behind service layer; fallback to manual submission instructions
BR-R02	Serbian regulatory changes pre-launch	Low	High — compliance requirements change	Asmir monitors APR; 2-week buffer in timeline for regulatory updates
BR-R03	Pricing underestimation — SMBs won't pay even €8/month	Low	High — entire business model at risk	Beta price testing; free tier with conversion; Freemium model as backup

#	Risk	Probability	Business Impact	Mitigation
BR-R04	Pantheon launches competitive cloud product	Low	Medium — reduces TAM addressable	Bilko wins on UX simplicity and price; switching costs are low but brand loyalty builds
BR-R05	Currency volatility (RSD depreciation)	Medium	Low — affects EUR pricing attractiveness	Price in EUR; local currency display only

Full technical risk register: [../governance/RISK-REGISTER.md](https://governance/RISK-REGISTER.md)

# Approval

Role	Name	Date	Signature
Author	John (AI Director)	2026-02-23	
Reviewer			
Business Analyst	John	2026-02-23	
Product Owner	John	2026-02-23	
AI Director (John)	John	2026-02-23	
Client Sponsor	N/A — internal product	—	
CEO (Alem)	Alem Bašić		

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