

# Implementation Status

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Current build state as of Q1 2026.

## Component Status Table

Component	Status	Target
API server (Kotlin/Ktor)	Foundation built	Q2 2026
Croatian bank integration (Berlin Group)	Architecture ready, sandbox pending	Q3 2026
Serbian bank integration — EU groups (UniCredit, Raiffeisen, NLB)	Architecture ready	Q4 2026
Serbian domestic banks (NBS bilateral)	Stub — awaiting NBS registration	Q4 2026
BiH bilateral banks	Planned	Q1 2027
Node.js SDK ( <code>@tokapi/sdk</code> )	Built	Q2 2026
Python SDK ( <code>tokapi-sdk</code> )	Built	Q2 2026
Kotlin SDK ( <code>io.tokapi:sdk-kotlin</code> )	Built	Q2 2026
Webhooks	Designed	Q3 2026
Payment initiation (PISP)	Planned	Q3 2026

## Phase Timeline

### Phase 1 — Foundation (Q2 2026)

- Ktor API server with core endpoints (`/accounts`, `/transactions`, `/consents`)
- Bank adapter interface (`BankAdapter`)
- `BerlinGroupAdapter` skeleton

- Node.js + Python + Kotlin SDKs (built)
- AISP registration at Finanstilsynet (Norway) — target: approved by Q2 2026

## Phase 2 — Croatia Live (Q3 2026)

- `BerlinGroupAdapter` production-ready for Croatian banks
- QWAC certificate (DigiCert or GlobalSign) for PSD2 mTLS
- 3+ Croatian banks connected (Erste, OTP, Raiffeisen)
- 90-day consent expiry flow + email notifications
- Webhooks for transaction notifications
- PISP planning begins
- EEA passporting: Norway → Croatia (HNB)

## Phase 3 — Serbia Live (Q4 2026)

- NBS AISP registration complete
- `BilateralAdapter` for domestic Serbian banks
- EU bank groups in Serbia via `BerlinGroupAdapter` (UniCredit, Raiffeisen, NLB)
- 3+ Serbian banks connected

## Phase 4 — BiH (Q1 2027)

- Bilateral agreements with EU bank groups in BiH (UniCredit, Raiffeisen, NLB)
- First BiH bank connected

# Regulatory Timeline

Milestone	Target	Status
Email to Finanstilsynet (NO)	Feb 2026	Done ✓
AISP application submitted (NO)	Apr 2026	Pending
AISP approved (NO)	Jun 2026	Pending
Passport notification to HNB (HR)	Jun 2026	Pending
NBS pre-application inquiry (RS)	Q2 2026	Pending
ALAI Tech d.o.o. APR registration (RS)	Mar 2026	Pending
NBS AISP registration submitted (RS)	Jul 2026	Pending
NBS AISP approved (RS)	Q4 2026	Pending

# SDK Status

SDK	Package	Status
Node.js / TypeScript	@tokapi/sdk	Built — Q2 2026
Python 3.10+	tokapi-sdk	Built — Q2 2026
Kotlin	io.tokapi:sdk-kotlin	Built — Q2 2026

## MC Tasks (Open Banking)

Tasks #1934–#1943 track all Open Banking / Tok regulatory and development work.

Task	Description	Priority
#1934	AISP registration HR (HNB passporting)	High
#1935	AISP registration RS (NBS)	High
#1936	Research HNB AISP process	High
#1937	Research NBS AISP process	High
#1938	Croatian bank API sandbox testing	Medium
#1939	Serbian bank API mapping (bilateral)	Medium
#1940	BiH bilateral approach	Medium
#1941	PISP authorisation RS	Low
#1942	Bank feed architecture	Medium
#1943	Professional Indemnity Insurance	High

Revision #3

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