Do I issue a tax invoice to a citizen who pays into a bank account?

For: Trading company · limited liability company · limited company

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Applicability: 1. 1. 2026.

From 1 January 2026, the fiscalisation of final consumption will also cover the transaction account, subject to statutory exemptions.

The type of traffic decides.

In everyday parlance, a payment to an IBAN is often referred to as "cashless", but that description does not fulfil the legal requirement. First, determine whether it constitutes end-use and whether any relevant exemption applies.

Trades, limited liability partnerships and limited liability companies need to establish procedures for their sales channels: direct sales, online ordering and other delivery methods. You should ask the software provider for confirmation of the specific scenario, not just a general assertion that the programme "has fiscalisation."

How to prepare this in your business

For each sales channel, record who the customer is, when the document is created, how it is paid for and which programme it is processed in. In the same worksheet, also include questions about returns, cancellations or corrections so that you can obtain a more complete overview of the procedure from the provider.

If the customer or the type of sale changes, check whether the existing setting applies to the new case. The same product can be sold under different business arrangements; the product name alone does not determine the entire process.

Example of a service to the citizen

A citizen orders a service and pays for it by bank transfer. The payment alone does not turn that relationship into a B2B one. Before issuing, check the end-user consumption rules for your sector.

Specific next steps

1. Check whether it is end consumption.
2. Check the exemptions for the activity.
3. Secure the issuance and fiscalisation process.

Most common mistakes

• To conclude that an IBAN automatically excludes fiscalisation.

• Use the same process for all customers without checking for exemptions.

Limits of application

Separate from the B2B e-invoice exchange.

Sources

Official Gazette · Law on Fiscalisation, OG 89/2025

https://narodne-novine.nn.hr/clanci/sluzbeni/2025_06_89_1233.html

Original page

https://adriatrends.hr/poslovni-vodic/en/pitanja/b2c-bankovna-uplata