



GLOBAL WEALTH MANAGEMENT
RESEARCH & INSIGHTS

ENTERPRISE AI & TECHNOLOGY

THE 18-MONTH COMPLIANCE CLOCK

What Every European Enterprise Needs to Know Before January 2028

15

Confirmed
Deadlines

3

Regulatory
Frameworks

18

Months
Remaining

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The Situation at a Glance



Between now and January 2028, European enterprises face the densest concentration of regulatory technology deadlines in a generation. **E-invoicing mandates, cybersecurity law, and infrastructure end-of-life are converging simultaneously** — with financial penalties, invalid invoices, and personal board-level liability at stake.

01 THE COMPLETE DEADLINE TIMELINE



02 ALL 15 DEADLINES — YOUR COMPLIANCE REGISTER

Date	Requirement	Area	Status	Exposure
Active	Belgium B2B e-invoicing (Peppol BIS 3.0)	E-Invoicing	LIVE	High
Active	Poland KSeF 2.0 — large enterprises	E-Invoicing	LIVE	High
Active	Germany NIS2UmsuCG — personal management liability	Cybersecurity	LIVE	Critical
Apr 2026	Poland KSeF — all VAT-registered entities	E-Invoicing	IMMINENT	High
Apr 2026	Germany BSI registration — all NIS2 in-scope	Cybersecurity	IMMINENT	Critical
Sep 2026	France e-invoicing — large/mid must issue	E-Invoicing	5 months	High
Oct 2026	Windows Server 2012 R2 patches END permanently	Infrastructure	6 months	Critical
Jan 2027	Germany e-invoicing — businesses >€800K	E-Invoicing	9 months	High
Jan 2027	Norway B2B e-invoicing mandatory	E-Invoicing	9 months	Medium
Jan 2027	Windows Server 2016 extended support ENDS	Infrastructure	9 months	High
H1 2027	Spain B2B e-invoicing — companies >€8M	E-Invoicing	~12 mo	Medium
Sep 2027	France e-invoicing — all SMEs must issue	E-Invoicing	17 months	Medium
Jan 2028	Germany e-invoicing — ALL businesses	E-Invoicing	21 months	High
H2 2028	Spain e-invoicing — all remaining businesses	E-Invoicing	~28 mo	Medium
Jul 2030	EU ViDA — cross-border B2B e-invoicing mandatory	E-Invoicing	4+ years	Strategic

Fifteen confirmed deadlines across three categories. No European enterprise operating across borders will escape all of them. The question is sequencing.

03 WHY THESE ARE ONE PROGRAMME, NOT FIFTEEN PROJECTS

The instinct is to assign each deadline to a separate team. This is the most expensive approach possible — because the deadlines are **structurally interdependent**.



E-invoicing needs ERP changes	Server EOL = NIS2 breach	Archive rules cross all three
Building connectors on end-of-life infrastructure means compliance on a non-compliant foundation.	An unpatched OS is a documented NIS2 non-compliance. Auditors and cyber insurers will flag it.	Germany: 8yr. France: 10yr. UK: 6yr. Retention rules must be designed into your architecture from day one.

150–1,200%

The hidden wildcard: virtualisation costs

Recent consolidation in the hypervisor market has imposed price increases of 150–1,200% on many customers. Any infrastructure change must evaluate virtualisation platform economics as part of the same programme.

04 THE SEQUENCING LOGIC — 4 PHASES

With eighteen months and fifteen deadlines, sequencing is everything. **The right order means each investment creates the platform for the next.**



PHASE 1	Audit & Foundation	<i>Now — Q3 2026</i>
<ul style="list-style-type: none"> ● Single assessment covering ERP, server lifecycle, virtualisation costs, NIS2 posture & BCM ● Refresh end-of-life infrastructure before building compliance tools on top of it ● Do not build new compliance capability on infrastructure that is itself non-compliant 		
PHASE 2	Build the Compliance Layer	<i>Q3 2026 — Q1 2027</i>
<ul style="list-style-type: none"> ● Deploy e-invoicing for first country (France Sep '26 or Germany Jan '27) ● ERP connectors built for Country 1 become reusable templates for all subsequent countries ● Implement NIS2 information security management system and register with national authority 		
PHASE 3	Extend & Harden	<i>Q1 2027 — Q3 2027</i>
<ul style="list-style-type: none"> ● Roll e-invoicing to Germany, Norway, France SMEs, Spain through the reusable architecture ● Deploy continuous security monitoring — NIS2 requires ongoing operations, not a one-time audit ● Conduct tabletop exercises and build the evidence trail auditors and cyber insurers will request 		
PHASE 4	Optimise & Compound	<i>Q3 2027 onward</i>
<ul style="list-style-type: none"> ● Automate AP, AR, and bank reconciliation processes that e-invoicing has digitised ● The compliance infrastructure now delivers operational efficiency and financial visibility ● This is where the initial investment compounds into measurable business advantage 		

05 THE COST OF DELAY — PENALTY EXPOSURE

<p>€10M</p> <p>or 2% global turnover NIS2 Essential Entity</p>	<p>INVALID</p> <p>Invoices if non-compliant Payments stall. VAT rights at risk.</p>	<p>2x</p> <p>Premium on consultant rates for crisis-mode projects</p>
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The Cost of Waiting

<p>Start April 2026</p> <p>18 months runway Deliberate sequencing Lower consultant rates Minimal rework</p>	<p>Start September 2026</p> <p>9 months remaining Compressed timelines Premium rates begin Some parallel conflicts</p>	<p>Start January 2027</p> <p>Crisis mode Emergency rates France deadline missed Board liability active</p>
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The clock started months ago.

The question is not whether your organisation will comply. It is whether you will comply on your terms, or on the regulator's.

About GWM Enterprise AI & Technology

GWM's Enterprise AI & Technology vertical delivers governed, AI-integrated solutions through three Centres of Excellence: Finance Process Automation, Cyber Resilience & Compliance, and IT Modernisation & Cloud — serving European enterprises with fiduciary-grade accountability.

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