

ISO 20022 Migration Impact On Clients

Frequently Asked Questions

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world

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INTRODUCTION

SWIFT has announced a significant decision to postpone the implementation of the standards release originally scheduled for 15 November 2026.

Following requests from several banking communities within the network, the deadline for the transition from unstructured to structured postal addresses is extended.

Unstructured address formats for international and treasury transfers exchanged via SWIFT will continue to be accepted until the new deadline. SWIFT will confirm the revised timeline before the end of 2026.

The major Market (Target2, CHAPS, Fedwire, SEPA, etc) decided to follow Swift's updated timeline, saving interoperability amongst systems (few exceptions under analysis).

Depending on the specific payment type or network, unstructured addresses (primarily for file imports) will continue to be accepted by BNP Paribas beyond November 2026.

However, in a continuous effort to support structured addresses, BNP recommends clients to finalize the internal projects to migrate as soon as possible to structured or semi-structured addresses.

While our series of ISO 20022 newsletters provides comprehensive information on the transition from unstructured postal addresses, the migration scope, and required client actions, many questions continue to emerge.

This document addresses the most frequent inquiries, categorized as follows:

- Requirements for structuring addresses according to the ISO 20022 XML format
- Payment methods in scope
- Bank and network validation
- Guidance on pain.001
- Clarifications regarding MT101 and CFONB
- Reporting



REQUIREMENTS FOR STRUCTURING ADDRESSES ACCORDING TO THE ISO 20022 XML FORMAT

Can we already provide structured addresses now? Also, can we use semi-structured addresses instead of structured ones?

We strongly recommend adopting the fully structured address format whenever possible. While the semi-structured format may be used as a compromise between data quality and ease of implementation, the fully structured format remains the preferred standard.

Please be advised that certain BNP Paribas channels will shortly require the Town Name and Country for beneficiary addresses on specific payment types.

Does the deadline for phasing out unstructured addresses apply exclusively to BNP Paribas, or is it a general industry requirement?

This transition is part of the global ISO 20022 standard mandated by SWIFT, the EPC, and various local regulators. Therefore, it is a requirement for all banks worldwide and extends to all clients who initiate payments.

Which parties require a structured or semi-structured address?

If an address is present, it must contain at least the Town Name and the ISO Country Code.

This requirement applies to the following parties:

- Initiating Party
- Debtor
- Debtor Agent
- Ultimate Debtor
- Ultimate Creditor
- Intermediary Bank
- Creditor
- Creditor Agent

For credit transfers where the debtor's name and address are mandatory, BNP Paribas will automatically retrieve the information from its master data to create the interbank payment instruction. **Avoid populating the PstlAdr field if you cannot include the two mandatory elements Ctry and TownName.** Only the name is sufficient.

Does the requirement for (semi-)structured addresses apply only to corporate entities and associations, or does it also include private individuals?

The requirement for (semi-)structured addresses applies to all parties, regardless of their legal status (companies, associations, or individuals). For example, if an address is provided for a salary payment beneficiary, it must also follow the (semi-)structured format.

Could an unstructured debtor address lead to a payment rejection?

Yes. After the deadline (date TBC), unstructured addresses will no longer be accepted. For accounts held within the BNP Paribas Group, we will automatically substitute the debtor's address with the information stored in our database. However, if BNP Paribas acts as your forwarding bank, please ensure that payment instructions include a structured or semi-

structured debtor address to prevent SWIFT rejections.

Will there be any charges from BNP Paribas or the beneficiary bank in the event of incorrect address details?

While BNP Paribas does not charge fees for payments rejected due to incorrect address formats, please note that the beneficiary bank may place such transactions under investigation. Any investigation fees incurred by BNP Paribas from the beneficiary bank will be passed on to the client.

Is the semi-structured address format permanent, or will it be phased out?

While there is currently no announced end date for the semi-structured format, the long-term goal is to transition to fully structured addresses to improve overall data quality and interoperability.

Is there a requirement for clients to sign legal documentation regarding the change of address format?

No, clients are not required to sign any documentation for this transition.

Do we need to update our accounting software to comply with the new transfer standards?

Yes. To ensure seamless processing, please ensure that your accounting software is compliant with ISO 20022 requirements.

What should I do if a supplier does not provide their full address?

You will need to request the missing information from the supplier.

PAYMENT METHODS IN SCOPE

When are addresses required?

THE REQUIREMENT TO PROVIDE AN ADDRESS VARIES DEPENDING ON THE PAYMENT TYPE AND THE PARTY INVOLVED.

While counterparty addresses are currently only **MANDATORY** in specific cases, the upcoming ISO 20022 regulations will introduce a change: whenever an address is provided, it must be formatted as a structured or semi-structured address. The exact effective date for this requirement is yet to be confirmed.

WHEN IS AN ADDRESS REQUIRED ?

TABLE BASED ON EU REGULATION,
APPLICABLE TO EU ACCOUNTS
OF THE DEBTOR (PAYMENTS)
OR OF THE CREDITOR (SDD)

PAYMENT	DEBTOR ADDRESS	CREDITOR ADDRESS
International (Cross-border) and RTGS (eg Target2 for €)	Mandatory if payment to non-EEA country* or in non-EEA currency** (Regulation EU 2023/1113). BNP Paribas provides it for all transactions debited on BNP Paribas accounts	▪ Mandatory if requested by local regulation (cfr. BNP Paribas' Currency Guide –e.g. payments towards Canada in all currencies) ▪ Recommended if payment to non-EEA country* or non-EEA currency** ▪ Optional in all other cases
SCT and SCT Inst	Mandatory if payment to SEPA non-EEA country*** (Regulation EU 2023/1113). BNP Paribas provides it for all transactions debited on BNP Paribas accounts	Optional
COLLECTION	DEBTOR ADDRESS	CREDITOR ADDRESS
SDD	▪ Mandatory if collection to/from SEPA non-EEA country*** ▪ Optional in all other cases	Optional

* EEA - European Economic Area: EU 27 countries, Norway, Liechtenstein and Iceland

** EEA currencies different from €: CHF, CZK, DKK, HUF, ISK, NOK, PLN, RON, SEK

*** SEPA non-EEA countries: Andorra, Monaco, San Marino, Switzerland, United Kingdom + other small territories belonging to some SEPA countries

Provided by BNP Paribas
except for third party
bank accounts

Provided by Client
under its responsibility

Is it mandatory to provide counterparty addresses in all payments?

The obligation to provide addresses differs in function of the payment type and the concerned party (debtor, creditor). Some countries such as Canada for example require the creditor address for all payments towards or passing through Canada.

Please refer to the [Currency Guide](#) to know if an address is mandatory.

Is it mandatory to provide structured addresses in low-value domestic payments?

In specific countries (such as Switzerland, Romania, and the Nordic countries—Sweden, Denmark, and Norway), regulators have mandated compliance with ISO 20022 rules for domestic payments whenever an address is provided. Other jurisdictions may implement these regulations at a later date.

When does BNP Paribas automatically retrieve address information from its master data?

The retrieval of address information depends on the account type and the payment method:

- **Debtor Accounts held at BNP Paribas:** Address information is automatically retrieved from master data for **Credit Transfers** only. This does not apply to SEPA Direct Debits.
- **Debtor Accounts held at third-party banks:** The user is responsible for providing the correct structured or semi-structured address.
- **Creditor Accounts:** The address must be provided by the user for both **Direct Debits** and **Credit Transfers**.



Is the new hybrid or structured address required for all payment types (SEPA, International), regardless of the origin or destination country?

The requirements depend on the type of payment and destination:

- **SEPA payments (within the EEA):** An address is not mandatory. However, if you choose to include a postal address in the payment instruction, it will have to be compliant (including Country Code and Town Name) after the unstructured address format end-date.
- **International payments (outside the EEA):** Addresses are generally recommended. Please note that an increasing number of countries now require mandatory addresses. For detailed requirements by destination, please refer to the list of [Countries requiring the Beneficiary Address](#).

Does the term "foreign payments" refer exclusively to transfers made to bank accounts located abroad?

No. A foreign payment includes any transaction conducted in a foreign currency, regardless of whether the accounts are located in the same country (e.g., between two French accounts).

Furthermore, the transition to the ISO 20022 standard applies to:

- International and intracompany flows.
- Domestic RTGS (Real-Time Gross Settlement).
- SEPA payments.
- Domestic flows in countries that have already adopted the standard (e.g., Switzerland, Romania, and the Nordic countries).

Is there a database available to help companies update bank and supplier addresses?

- **For Supplier/Debtor Addresses:** For credit transfers where the debtor's name and address are mandatory, BNP Paribas automatically retrieves this information from its internal master data to generate the interbank payment instruction. Please note that this automatic retrieval does not apply to SEPA Direct Debits.
- **For Beneficiary/Creditor Addresses:** As payment initiator, only you have all the details of your counterparties. It is therefore critical that you provide this data in a structured way, for the payment types that require it.
- **For Bank Addresses:** You may consult [SwiftRef Bankers World Online](#) to verify and update bank address information.

Does the ISO 20022 transition affect pain.008 messages for Direct Debits?

SEPA Direct Debits are impacted by the ISO 20022 transition. However, Local Direct Debits remain unaffected unless otherwise specified by the local regulator (e.g., Switzerland).

Do I need to start providing addresses for my SEPA batch payments within the EEA?

There is no change if you currently do not provide addresses. However, if your payment files already include address information, please note that this data must be adapted to the ISO 20022 format (Town Name and ISO Country Code) after the unstructured address format end-date.

Are addresses required for the ultimate debtor or ultimate creditor in cross-border payments outside the EEA?

The ISO 20022 rules impact all fields where an address is provided. While providing an address for ultimate parties remains optional, any address entered must follow the new standard. A specific exception applies to domestic RTGS via HPVS+.

where providing the name and a compliant ISO 20022 address (containing at least the Town Name and Country Code) is mandatory for ultimate parties.

COUNTRY-SPECIFIC REQUIREMENTS

What are the address requirements for the creditor and creditor agent, and do specific requirements vary by country?

The mandatory address requirements (specifically the **Country Code** and **Town Name**) apply uniformly to every agent within the payment chain.

For detailed country-specific requirements, please refer to the following resources:

- [Countries requiring the Beneficiary Address](#)
- [Currency Guide | BNP Paribas Cash Management](#)
- [PMPG Country Guidance](#)

Note on Local Payments: For domestic payments in countries that have adopted ISO 20022 (e.g., Switzerland, Romania, and the Nordics), addresses are optional. However, any provided address must be ISO 20022 compliant (minimum: Town Name and Country).

Switzerland: For transfers issued from a Swiss account (IBAN CH) to a Swiss or French beneficiary in CHF, is the beneficiary's address mandatory?

Yes. Domestic Swiss flows must comply with the ISO 20022 standard. Furthermore, transfers from Switzerland to France are classified as international flows and must comply with the ISO 20022 standard after the unstructured address format end-date.

UK: For UK domestic payments, are there any immediate changes required, or will these be aligned with ISO 20022 over time?

After the unstructured address format end-date, ISO 20022 requirements will apply to CHAPS and Faster Payments. BACS payments remain unaffected.

Italy: Does the ISO 20022 structured/hybrid address requirement apply to RIBA (Ricevuta Bancaria) for customer payment collections in Italy?

No, RIBA is excluded from these requirements.

Middle East: For payroll mass upload payments (WPS and non-WPS) in Middle Eastern countries such as Saudi Arabia, Qatar, Bahrain, and the UAE, is it necessary to update the templates to include employee addresses?

No, WPS (Wages Protection System) payments are not affected by the ISO 20022 regulations. BUT if you pay via International Payroll, you need to follow the ISO 20022 rules.

France: Are Bill of Exchange (LCR) formats impacted by ISO 20022?

No. Bills of Exchange are not impacted by the ISO 20022 migration. However, for clients who prefer to modernize their processes, we do accept Bills of Exchange in ISO XML format.



BANK AND NETWORK VALIDATION

Is the "Country" field mandatory for both the debtor and the creditor?

Yes. Upon the expiration of the unstructured address format, the ISO Country Code and Town Name fields are both mandatory when an address is provided. The country must be entered as a valid ISO country code (e.g., "ES" for Spain). Please note that payments missing the country field will be rejected.

Is the "Town Name" field mandatory for both the debtor and the creditor?

Yes. Upon the expiration of the unstructured address format, the "Town Name" and "ISO Country Code" become mandatory whenever an address is provided. Please note that payments will be rejected if the Town Name field is missing.

Should the building number be entered into the dedicated "Building Number" field, or can it be included within the "Street Name" field?

Although the ISO 20022 standard requires data to be placed in its corresponding field, including the building number within the "Street Name" field will not result in a rejection by BNP Paribas or Swift. We recognize that certain ERP systems may not be able to separate these elements.

Will payments be rejected if structured address data is repeated in the Address Line fields or if the postal code is included in the <TwnNm> field?

No, BNP Paribas and SWIFT will not reject these payments. However, duplicating structured data in the Address Line fields deviates from SWIFT guidelines. This may cause the beneficiary bank to trigger a manual review, potentially leading to processing delays, additional fees, or rejection by the receiving institution.

Can I use "unknown" if the Town Name is unavailable?

While BNP Paribas will not reject payments containing placeholders (e.g., "unknown" or "not provided"), doing so may cause the beneficiary bank to reject the transaction or result in processing delays and extra costs.

How should I initiate payments when a town or city name is unavailable?

In remote areas where a specific town or city name is unavailable, please use the country subdivision (e.g., state, province, or region) instead. For clarity and to avoid processing errors, enter this same value in both the town name and country subdivision fields. This confirms the information is intentional and ensures the payment is correctly identified geographically.

What is the procedure for town names that exceed the character limit?

In cases where a town name exceeds 35 characters, it must be truncated. Please ensure the shortened version remains sufficiently clear to allow for accurate identification.

What is the character limit for the Name field?

The maximum length of the name field is either 70 or 140 characters, depending on the specific payment type.



Is the BIC the sole identifier for agent banks?

For SEPA payments, yes. However, for non-SEPA payments, if no BIC is available, you must provide the bank's name and a structured or hybrid address.

What is the impact of leaving an address field blank in an XML message?

Payments will be rejected if a field is left empty, as XML standards require any present field to contain a value. If a specific address element is unknown, the field must be removed from the XML code entirely. Please note that the Country Code and Town Name are mandatory and cannot be removed.

Should the structured XML address tags contain the beneficiary's original account-opening address or their current operational address?

Use the current address registered with the beneficiary's bank, specifically the one used for invoicing and correspondence.

Is there a specific required order for hybrid address fields (e.g., pstCd, TwnNm, Ctry)?

Yes, the sequence of these fields is mandatory. To be accepted by the acquisition channel, files must comply with the ISO XSD schema for the pain.001 version. Please note that this is a pre-existing requirement for XML processing and not a new ISO 20022 rule.

In a batch containing multiple payments, will the entire batch be rejected if one beneficiary's address is incorrectly formatted?

No, only the individual payment with the incorrect postal address will be rejected; the rest of the batch will be processed.

Can the Address field be used to complete a third-party name that exceeds the character limit before the actual address begins?

Using the Address field to complete a long third-party name is no longer supported and must be discontinued. Any information entered in the Address field will be treated exclusively as part of the address.

Will BNP Paribas verify that mandatory fields are completed and accurate?

Yes, BNP Paribas will verify that all mandatory fields are populated. However, neither BNP Paribas nor SWIFT will validate the accuracy of the data provided. The beneficiary bank may perform its own verification, which could result in manual investigations, processing delays, potential rejection of the payment, and additional charges (up to €50 per investigation).

Are address requirements different for businesses versus individuals?

No, the same address rules apply to both legal entities and natural persons.

What happens if the address in the payment file does not match the beneficiary bank's records?

The outcome depends entirely on the beneficiary bank and may result in acceptance, rejection, or investigation (leading to delays and fees). BNP Paribas only validates that the country code and town name are present if a postal address is included.



Is the use of abbreviations permitted within the address fields?

While BNP Paribas does not validate the specific content of the fields, the beneficiary bank may flag the payment for investigation, which could result in additional fees.

GUIDANCE ON PAIN.001

Must I upgrade to pain.001 v9? When do v2 and v3 expire?

No, upgrading to v9 is optional.

- **pain.001 v3:** No end date; can be used if ISO 20022 rules are met.
- **pain.001 v2:** Will be decommissioned by the end of 2027 (files will be rejected thereafter).

We recommend migrating to v9 where it is possible to benefit from six additional data fields for more detailed reporting.

Is pain.001 v9 currently supported?

Yes, pain.001 v9 is already accepted by BNP Paribas.

If I use pain.001 v9, can I continue using PSR v3, or is a migration to v10 required?

Clients using pain.001 v9 may continue to use the Payment Status Report (PSR) v3; migration to PSR v10 is not mandatory.

Does pain.001 v9 support semi-structured addresses?

Yes, semi-structured addresses are supported in pain.001 v9. Files can be validated using MyStandards.

Should the BIC tag be replaced by the BICFI tag in the pain.001 v9 XML?

Yes, this is required to comply with the pain.001 v9 XSD schema.

How can I migrate from the XLS import file format to XML pain.001?

Please contact your software vendor or IT specialist for assistance with this migration. For Connexis Cash users, please verify with your Administrator that XML import permissions have been granted.

Could you please confirm whether multi-transaction pain.001 files will continue to be accepted, or if we will be required to split them into individual files

There is no impact on this process; you may continue to submit multi-transaction files.

Where should the "Post box" information be placed in the pain.001 v3 format?

In the pain.001 v3, the "Post box" should be indicated in the Address Line as there is no dedicated field.

CLARIFICATIONS REGARDING MT101 AND CFONB

Will payments be rejected if the MT101 address line (field 59F) exceeds four lines of 35 characters?

Yes. Following the end date for unstructured addresses, MT101 messages containing more than four lines of 35 characters in the address field will no longer be permitted, and the corresponding payments will be rejected.

In the MT101 59F field or the CFONB320 hybrid format, must information following the town name be separated by a comma?

Yes, a comma is required to separate the town name from any subsequent data. However, subsequent pieces of information do not necessarily need to be comma-separated, as they will be processed as a general address line within Connexis and GCH.

I am unable to implement option 59F for the MT101; can I use field 59 instead?

Please be advised that once unstructured address formats are prohibited, the use of field 59 (no letter option) will result in the first four lines of 35 characters being processed exclusively as the beneficiary's name. As no address interpretation will be performed, the address should not be included when using this option.

Is it mandatory to provide information after the comma? If no additional information is provided, is the comma still required?

Additional address information following the town name is not mandatory. However, if such information is included, it must be separated by a comma to distinguish the structured component from the unstructured component of the line. Please refer to the PMPG Excel file, as certain countries require more detailed information than just the city and address. If no data follows the town name, the comma should be omitted.

Why is field 50F/H required if BNP provides the address information?

BNP will only automatically update debtor information for accounts held directly with BNP. Once unstructured address formats are no longer permitted, compliance with field 50F for debtors is mandatory for all accounts held with third-party banks.

Does BNP Paribas plan to decommission the CFONB 320 format for international payments, and if so, when?

We strongly recommend migrating to the pain.001 (v3 or v9) format. While there is currently no set decommissioning date for CFONB320, we encourage clients who continue using this format to implement the correct structuring of the "Address 3" section (e.g., FR/Paris, 75002) as soon as possible. This requirement will become mandatory once unstructured address formats are no longer supported.

What is the status of the AFB160/CFONB160 format for treasury payments?

You may continue using this format, as it is designed for domestic cash management transfers within France and does not require structured or semi-structured addresses (there is no dedicated field for country codes). While beneficiary addresses are not mandatory for domestic payments, BNP Paribas strongly recommends migrating to XML pain.001 (v3 or v9) to ensure future compatibility.

The CFONB-160 format (used for domestic treasury transfers) and the CFONB-320 format (used for international transfers) have limitations regarding current and anticipated future requirements (such as the LEI communication). Although they



remain usable for now under certain conditions, CFONB will no longer maintain these formats and removed them from its website. Consequently, clients are advised to plan their phase-out and migrate to pain.001 as soon as possible.

REPORTING

When will BNP Paribas stop sending MT940?

There is currently no planned end date for the provision of MT940. While there is no obligation to switch, migrating to camt messages becomes significantly more advantageous once all market participants are fully operational in ISO 20022 XML format. Please note that while we can map information from a camt.053 to an MT940, this process results in a loss of data.

