ISO 20022: THE END OF THE BEGINNING

On 22 November 2025, all financial institutions have successfully transitioned from SWIFT MT messages to ISO 20022 XML messages for all cross-border payments. Most important domestic market infrastructures (RTGS & CSM) had already undergone the same migration.

This change aims to enhance interoperability, improve fluidity and speed of payment execution, strengthen the fight against money laundering and terrorism financing, and provide a universal standard for payment files.

ISO 20022 makes address data more explicit and more structured compared to previous standards.

A key deadline is **15 November 2026**. From that point onward, payments with <u>unstructured</u> postal address format will be rejected by SWIFT and the market infrastructures (e.g. TARGET2, CHAPS, EBA STEP2). Free-format addresses are difficult to interpret and may lead to false positives in compliance checks. Any addresses must be semi-structured (hybrid) or structured.

Regardless of whether you use Connexis Cash, SWIFTNet, or another host-to-host channel, your payment initiation systems must be ready to use structured addresses or at least semi-structured addresses on time.

This is not a last-minute task—we kindly ask you to organize yourself for the upcoming milestones:

- Prepare your master data, ERP, treasury, and HR systems to support semi-structured or fully structured postal address formats. BNP Paribas will enforce address format validation in the payment instructions starting from the **value date of 15 November 2026**.

- Both structured and semi-structured addresses must include, at minimum Country code and Town name. If only the country is structured in the address, the town name must also be specified in the designated field.

- Placeholder terms such as *not provided* or *unknown* in the Town Name field will not trigger payment rejection by BNP Paribas but may result in processing delays and additional investigation costs, or even the beneficiary bank rejecting it.

- If using **the third-party bank service**, ensure payment instructions include also the debtor's structured or semi-structured address by **1 July 2026** to avoid SWIFT rejection.

- The MT101 does not support fully structured address format. However, adopting format F option for the beneficiary address (field 59F) in the MT101 enables BNP Paribas to obtain a semi-structured address.

- As the CFONB320 format can only support the semi-structured address format under specific conditions, we recommend planning its discontinuation and migrating to pain.001, preferably before 15 November 2026.

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ISO 20022 STRUCTURED ADDRESSES – WHAT IS CHANGING?

❯ **Key dates:**

- November 2025: Semi-structured (also called 'hybrid') format became available
- Transition period: Nov 2025 – Nov 2026: Structured, hybrid, and unstructured formats are accepted
- From November 15th 2026: Fully unstructured addresses will be rejected
- Note for Connexis Cash users: from 9 May 2026, BNP Paribas will impose the inclusion of the `TownName` field for manual entries.

Since November 2025, a new semi-structured postal address format is available. This format combines structured fields (Town Name and Country at the minimum) with up to two unstructured address lines of 35 characters.

During the **transition period between Nov 2025 and Nov 2026,** structured, semi-structured, and unstructured formats are accepted.
The fully structured address format only contains structured fields.

Effective 15 November 2026, BNP Paribas will no longer process payments containing fully unstructured counterparty addresses. **This change requires all your payment instructions to include addresses in either a semi-structured or fully structured format.**

Non-compliant messages will be rejected to mitigate processing delays and avoid additional operational burdens.

WHAT IS THE SEMI-STRUCTURED POSTAL ADDRESS FORMAT?

The semi-structured postal address format enables you to combine structured and unstructured address data. At a minimum, the structured part must include the Town Name and Country Code (ISO 2-letter format). However, we strongly encourage you to provide as much address information as possible in the structured data elements—such as Postal Code, Street Name, and Building Number—whenever this data is available in a structured form.

The remaining address details can be entered across two lines, each limited to 35 characters of free-form text (Address Line). The unstructured address lines should only be used for information that cannot be reliably structured or does not fit into the available structured data elements.

In the semi-structured address, structured elements **must not be repeated** in the AdrLine element(s), as illustrated here:

CORRECT STRUCTURED ADDRESS	CORRECT HYBRID ADDRESS	WRONG HYBRID ADDRESS

\<Nm\>ALAIN DUPONT**\</Nm\>**
\<PstlAdr\>
    \<StrtNm\>Rue de France**\</StrtNm\>**
    \<BldgNb\>23**\</BldgNb\>**
    \<PstCd\>1000**\</PstCd\>**
    \<TwnNm\>Brussels**\</TwnNm\>**
    \<Ctry\>BE**\</Ctry\>**
\</PstlAdr\>
	\<Nm\>ALAIN DUPONT**\</Nm\>**
	\<PstlAdr\>
	    \<PstCd\>1000**\</PstCd\>**
	    \<TwnNm\>Brussels**\</TwnNm\>**
	    \<Ctry\>BE**\</Ctry\>**
	    \<AdrLine\>Rue de France 23**\</AdrLine\>**
	\</PstlAdr\>
		\<Nm\>ALAIN DUPONT**\</Nm\>**
		\<PstlAdr\>
		    \<StrtNm\>Rue de France 23**\</StrtNm\>**
		    \<PstCd\>1000**\</PstCd\>**
		    \<TwnNm\>Brussels**\</TwnNm\>**
		    \<Ctry\>BE**\</Ctry\>**
		    \<AdrLine\>Rue de France 23**\</AdrLine\>**
		\</PstlAdr\>

WHICH ACTIONS SHOULD YOU TAKE?

We kindly request your organization to:

1. Review and assess your existing payment initiation systems and data formats, including legacy formats such as MT101 or proprietary files.
2. Review the addresses currently stored in your databases to modify them into structured addresses, with a minimum of Country and Town Name.
3. Ensure all payment instructions—including future-dated transactions, standing orders, and recurring instructions in Connexis—are updated to comply with semi-structured or fully structured postal address formats by the value date of 15 November 2026. Where compliance with this requirement cannot be guaranteed, refrain from initiating sensitive payments around this date.

4. Ensure that by 15 November (payment value date), all postal addresses provided are using either the fully structured or hybrid format for the:

› Debtor (this information is necessary for accounts held at third-party banks. BNP Paribas will provide the information when the debited account is held in the BNP Paribas group);

› Creditor (synonym of Beneficiary);

› Ultimate Debtor/Creditor (if applicable);

› And related agents in the payment chain, if no BIC is available,

5. Whether using the fully structured or semi-structured format, you must provide at least a structured Town Name and a structured Country Code (ISO 2-letter format) and for each party.

If your records do not currently include the Town Name and Country Code for these parties, please prioritize reaching out to them and begin collecting this information as soon as possible. **Timely action is essential to ensure compliance with the upcoming requirements and to avoid any disruption to your payment processing.**

WHEN SHOULD YOU PROVIDE ADDRESSES IN YOUR PAYMENT INSTRUCTIONS?

› Address requirements for payments

The need for debtor and creditor customer addresses varies depending on the type of payment flow and the country in which the payment is made.

› Address requirements at a glance

The following table outlines when an address is required:

WHEN IS AN ADDRESS REQUIRED?

Payment Type	DEBTOR ADDRESS	CREDITOR ADDRESS
Cross-border and RTGS	**MANDATORY** if payment to non-EEA country* or in non-EEA currency** (Regulation EU 2023/1113). BNP Paribas provides it for all transactions for all BNP Paribas accounts	■ **MANDATORY** if requested by local regulation (cfr. BNP Paribas' Currency Guide - payments towards Canada in all currencies) ■ Recommended if payments to non-EEA country* or non-EEA currency** ■ Optional in 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 for all BNP Paribas accounts	Optional
SDD	■ **MANDATORY** if collection from SEPA non-EEA country*** ■ Optional in other cases	Optional

Provided by BNP Paribas except for third party bank account ****	Provided by Client

   * *EEA - European Economic Area: EU 27 countries, Norway, Liechtenstein and Iceland*
  ** *EEA currencies different from EUR: 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.*
**** *Please check with your debtor bank the minimum data required for the debtor/payer*

› Debtor information in Credit Transfers

For credit transfers where the debtor's name and address are mandatory, BNP Paribas automatically retrieves this data from its internal systems—provided the debited account is held within the BNP Paribas Group.

Attention: If BNP Paribas is your **forwarding bank***, please ensure payment instructions include also the debtor's structured or semi-structured address by 1 July 2026 to avoid SWIFT rejection.

› Creditor information in Credit Transfers

For credit transfers to destinations outside the European Economic Area (EEA), BNP Paribas recommends including the creditor's address, as an increasing number of countries now require this information.

As debtor, you are responsible for structuring this information.

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* *Forwarding bank means that you issue payments to debit third party bank accounts registered in your BNP Paribas connectivity solution.*

IN WHICH COUNTRY IS A CREDITOR ADDRESS REQUIRED?

The presence of addresses is mainly required in international payment transactions, where the risk of errors or non-compliance with regulations is higher.

The creditor's address is mandatory for certain destinations (e.g. Canada, Saudi Arabia, Singapore,...) and recommended in other cases.

❯ Country-specific requirements for counterparty addresses

For the list of countries requiring counterparty address details, refer to the BNP Paribas Cash Management website: <u>here</u>. This list is subject to updates as additional jurisdictions introduce mandatory creditor address requirements.

❯ International payment guidelines

The <u>BNP Paribas online Currency Guide</u> contains the practical guidelines for the formatting of your international payment instructions in more than 130 currencies.

❯ SEPA Direct Debits (SDD)

The **debtor's address** is a mandatory requirement for SEPA Direct Debit (SDD) transactions specifically when:

- The creditor uses an EEA-based bank for collection, but the debtor's bank is located outside the EEA.
- The creditor operates via a non-EEA bank, regardless of the debtor's bank location.

Example:

Jean-Pierre Dupont, resident in Brussels (BE), grants British Energy Ltd., a company in the United Kingdom, a SEPA Direct Debit mandate to collect monthly payments for electricity services from his bank account.

As the UK is a non-EEA country, the address of the debtor, JP Dupont, must be included in the SEPA Direct Debit (SDD) instruction.

ARE THERE SPECIFIC ADDRESS REQUIREMENTS PER COUNTRY?

Address formatting requires **at least** two mandatory fields for all countries:

1. Town – The creditor's location (town or city name).
2. Country – The creditor's country of residence.

Both fields must be provided in a structured format to ensure correct processing and avoid rejection. **Certain countries may impose additional formatting rules or require extra details**, such as postal codes or province names. Always verify the address requirements for the destination country to ensure compliance and prevent processing delays.

Alongside the Currency Guide, you can find country-specific address requirements on the swift.com website: <u>PMPG Country Guidance.</u>

WHAT VALIDATION RULES WILL BNP PARIBAS IMPLEMENT TO CHECK ADDRESS FORMATS AS OF 15 NOVEMBER 2026?

BNP Paribas will validate address formats in payment instructions effective 15 November 2026 (payment execution date).

When an address is provided, BNP Paribas will verify at minimum the presence—though not the accuracy—of the country and town.

Any payment missing either of these two elements will be automatically rejected.

These validation rules apply to both fully structured and semi-structured address formats. **Payments with fully unstructured addresses will be rejected.**

The country code is validated against the United Nations Alpha-2 standard. The town name is not verified—accuracy remains the responsibility of the submitting party.

Note: Placeholder terms such as *not provided* or *unknown* will not trigger payment rejection but may result in processing delays and additional investigation costs or even rejections from the beneficiary banks.

The address format controls apply to all payment methods: international, SEPA, and domestic payments processed via an ISO 20022-enabled market infrastructure.

When a postal address field is included in a payment instruction—even if optional—the country code and town name must be specified.

WHICH VERSION OF THE PAIN.001 SHOULD YOU USE?

The pain.001 format is recommended, irrespective of version. The latest ISO standard—pain.001.001.09—dates from 2019.

Earlier versions of the pain.001 remain currently accepted provided they support semi-structured address structuring.

WHAT IF YOU USE MT101 OR CFONB320 MESSAGE FORMATS?

Neither the MT101 nor the CFONB320 format supports fully structured address fields. Migration to pain.001 is strongly advised at the earliest opportunity—ideally before 15 November 2026.

However, these formats could still be used under the specific conditions outlined below.

❯ MT101

- If you are still using the MT101, use Field 59**F** to indicate a beneficiary address and ensure that it includes Country Code and Town Name as structured elements in line 3. This is the only way to support the transmission of semi-structured postal addresses.

  On 15 November, SWIFT will implement a Network Validated Rule to check that there are at least 2 characters after the country code. BNP Paribas will apply the same rule to all MT101s received.

To indicate the beneficiary address, please use field 59F as follows:

Subfield 1 *'Party Indentifier'*	/(Account) **or** (Code)(Country Code)(Identifier)
Subfield 2 *'Name & Address'*	1/Name of the ordering customer 2/Address details 3/Country code/Town

Example of a semi-structured postal address in **MT101 Field 59 (F-option)**:

:59F:/BE30001216371411
1/JOHN SMITH
2/HOOGSTRAAT 6, 18TH FLOOR
3/BE/BRUSSELS, 1000

Where:

1/= Name (JOHN SMITH)
2/=Address Line (HOOGSTRAAT 6, 18TH FLOOR)
3/=Country Code (BE)/Town Name (BRUSSELS), and Postal Code (1000)

If additional information follows the Town Name, it must be separated by a comma .

- If no beneficiary address is provided, the Field 59 No Letter Option may be applied. In this case, the first two lines will be processed as the beneficiary name only, excluding address interpretation.

❯ CFONB320

In the CFONB320 file, BNP Paribas can only identify the Country Code and Town Name if line 3 is present in the address and formatted as follows:

"3" = country code (2-character ISO code), followed by a slash and the city, a comma and postal code or any other subdivision.

Example of a **CFONB320** semi-structured postal address format:
Address line n°1 = Batiment Alsace
Address line n°2 = 60 rue de la source
Address line n°3 = FR/Paris, 75010

WHAT ABOUT OTHER LOCAL FORMATS?

The following import formats will be phased out in **Connexis Cash** and the **Direct Connectivity channels** by November 2026 due to their inability to process structured or semi-structured addresses. Users currently relying on these local formats are advised to transition to XML pain.001 without delay:

- CH DTA
- DE DTAZV
- IT CBI-BONI PE
- CZ CFA
- AT Edifact Paymul
- NL BTL91
- SAP IDOC
- PL Multicash PLA

BENEFITS OF MIGRATING TO ISO 20022 AND PAIN.001

Adopting the ISO 20022 messaging standard—specifically the pain.001 format for payment initiation—delivers key benefits:

- Improved straight-through processing (STP)
- Reduced manual interventions and error rates
- Enhanced data quality and integrity across the payment lifecycle
- Streamlined compliance with global regulatory and screening requirements

KEY DEADLINES OVERVIEW

CLIENT CHANNEL	DEBTOR AGENT	PARTY ADDRESS	MARKET DEADLINE	BNPP DEADLINE	CLIENT ACTION	CLIENT ACTION NATURE
All global channels	Third Party Bank	Debtor	15 November 2026	1 July 2026	YES	Add debtor's structured address
		Creditor			YES	Structure the address if present
Connexis Manual Entry	BNP Paribas	Debtor	15 November 2026	15 November 2026	NO	
		Creditor		9 May 2026	YES	Add town name minimum Country code requested by Connexis
Connexis File Import	BNP Paribas	Debtor	15 November 2026	15 November 2026	NO	
		Creditor		15 November 2026	YES	Add town name minimum Country code requested by Connexis
H2H channels (SWIFTNet, FTPS, SFTP, EBICS)	BNP Paribas	Debtor	15 November 2026	15 November 2026	YES for SDD	Add debtor's structured address if collection to/from SEPA non-EEA country
		Creditor		15 November 2026	YES	Structure address if present

You can rely on your dedicated Cash Management Officer and the BNP Paribas team of experts to guide you through this critical technical transition phase. Our team is committed to ensuring a seamless transition and is available to address any questions or concerns you may have.

BNP Paribas, your trusted partner for all your foreign payments and collections.