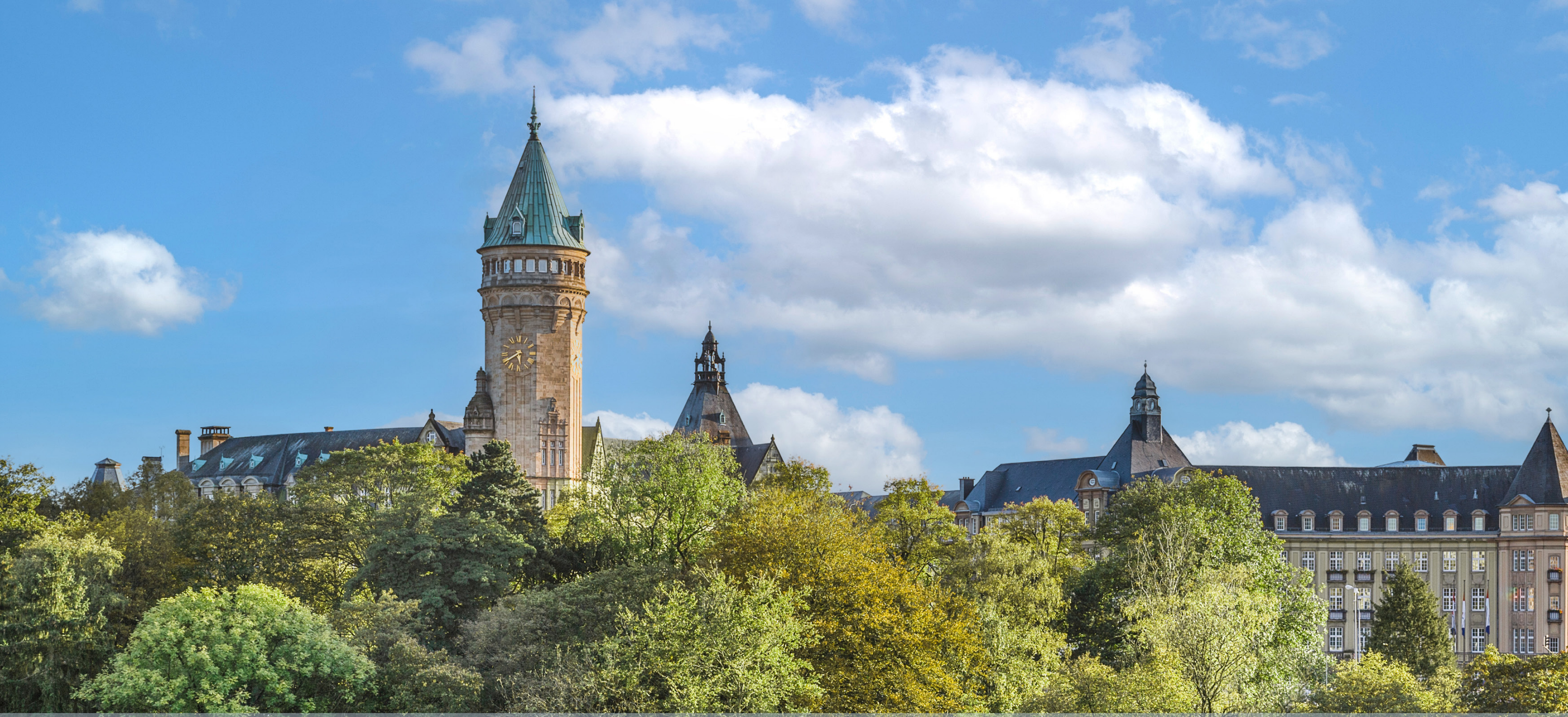

Newsletter 2026

ISO 20022 for corporates

The end of the transition period

The introduction of new payment message formats aims to increase interoperability, improve the fluidity and speed of payment execution, strengthen the fight against money laundering and terrorist financing, and provide a universal standard for payments.

ISO 20022 will make address data more explicit and more structured. **The key deadline is 15 November 2026**. From this date, payments containing an unstructured postal address for the beneficiary will no longer be accepted by banks.
Where a beneficiary address is provided, **it must be either semi-structured ("hybrid") or structured.**

Whether you are using S-Net Business, MultiLine, Ebics, SWIFTNet, SOFIE or another channel, your payment initiation systems must be ready to use structured or at least semi-structured addresses in time.
As this is an important task, we encourage you to begin preparing now for the next steps:

- Prepare your master data, ERP, treasury and HR systems to support semi-structured or fully structured postal address formats. Spuerkeess will be required to reject non-compliant payment instructions from the execution date of **15 November 2026.**
- The beneficiary's address is not mandatory for SEPA payments (EUR transfers within the SEPA area), but if provided it must be compliant.
- Structured or semi-structured beneficiary's addresses must include, at a minimum, **the country code and city name.**
- If you use **third-party banking services**, ensure that payment instructions also include **the debtor's structured or semi-structured address by 15 November 2026** to avoid any rejection.
- **If you are using the MT101 format you must migrate to pain.001, before 15 November 2026.**

SPUERKEESS

Your Bridge to Life

ISO 20022 structured addresses – What is changing ?

Key dates

- November 2025: The semi-structured format (also called “hybrid”) becomes available.
  This format combines structured fields (at least city name and country) with up to two unstructured address lines of 70 characters each.

- Transition period from November 2025 to November 2026: Structured, hybrid and unstructured formats are accepted.
  The fully structured address format must contain only structured fields.

- **From 15 November 2026: Payments with unstructured addresses for the beneficiary must be rejected by Spuerkeess. This change means that all your payment instructions will have to include beneficiary addresses in either semi-structured or fully structured form. An address must include at least the beneficiary’s “country” and “city” fields.**

Important! The beneficiary address is not mandatory in the case of SEPA payments (transfers in EUR within the SEPA zone)*, but if provided it must be compliant. For payments in foreign currencies and/or outside the SEPA zone, the address is mandatory.

Non-compliant messages will be rejected to reduce processing delays and avoid additional operational costs.

What is the semi-structured postal address format?

The semi-structured (or hybrid) mailing address format allows you to combine structured and unstructured address data. At a minimum, the structured part must include the city name and the country code (ISO two-letter format). However, we strongly encourage you to provide as much address information as possible in the structured data elements — such as postcode, street name and building number — whenever such data is available in structured form.
Other address details may be entered on two lines, each limited to 70 characters of free text (Address Line). Unstructured address lines should be used only for information that cannot be reliably structured or does not fit into the available structured data elements.

In a semi-structured address, **structured elements should not be repeated** in the unstructured field(s) (“AdrLine”), as illustrated here:

Correct structured address

```
<Nm>ALAIN DUPONT</Nm>
<PstlAdr>
        <StrtNm>Avenue de la Liberte</StrtNm>
        <BldgNb>23</BldgNb>
        <PstCd>1234</PstCd>
        <TwnNm>Luxembourg</TwnNm>
        <Ctry>LU</Ctry>
</PstlAdr>
```

Correct hybrid address

```
<Nm>ALAIN DUPONT</Nm>
<PstlAdr>
        <PstCd>1234</PstCd>
        <TwnNm>Luxembourg</TwnNm>
        <Ctry>LU</Ctry>
        <AdrLine>Avenue de la Liberte 23</AdrLine>
</PstlAdr>
```

* Exception: For payments to Switzerland, the beneficiary’s address is mandatory.

Unstructured address

```
<Nm>ALAIN DUPONT</Nm>
<PstlAdr>
        <AdrLine>Avenue de la Liberte 23</AdrLine>
        <AdrLine>>1234 Luxembourg</AdrLine>
        </PstlAdr>
```

Incorrect hybrid address

```
<Nm>ALAIN DUPONT</Nm>
<PstlAdr>
        <StrtNm>Avenue de la Liberte 23</StrtNm>
        <PstCd>1234</PstCd>
        <TwnNm>Luxembourg</TwnNm>
        <Ctry>LU</Ctry>
        <AdrLine>>Avenue de la Liberte 23</AdrLine>
</PstlAdr>
```

What actions should you take?

1. Review and assess your payment initiation systems and existing data formats, including legacy formats such as MT101 or proprietary files.
2. Review the addresses currently stored in your databases and convert them into structured or hybrid formats, including at least the "Country" and "City Name" of the beneficiary.
3. Ensure that all payment instructions — including future-dated transactions, standing orders and recurring instructions — are updated to comply with semi-structured or structured address formats by 15 November 2026. If compliance with this requirement cannot be guaranteed, avoid initiating sensitive payments around that date.
4. Ensure that by 15 November 2026 (payment execution date), all postal addresses provided use either the fully structured format or the hybrid format for:
   - the Debtor (This information is necessary for accounts held with third-party banks. Spuerkeess will provide the information when the debited account is held within the Spuerkeess group.)
   - the Creditor (synonymous with beneficiary), in particular in the case of direct debits
   - the ultimate debtor/creditor (if applicable)
   - and agents in the payment chain where no BIC code is provided
5. Whether using the fully structured or semi-structured format, each counterparty must include a city name and a country code (2-letter ISO format), entered in the fields provided for this purpose.

If your reference data does not currently contain the city name and country code for these parties, please start collecting this information as soon as possible. Prompt action is essential in order to ensure compliance with the upcoming requirements and avoid disruption in the processing of your payments.

When do you need to provide addresses in your payment instructions?

Processing requirements for payments

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

Address requirements at a glance

When is the address required?

Type of transfer	Debtor address	Address of the beneficiary (creditor)
International or high-value transfers	**Mandatory** if to a beneficiary or in a currency outside the European Economic Area* (Regulation EU 2023/1113) Always provided by Spuerkeess	**Mandatory** -for payments in non-euro currencies and / or outside the SEPA area -if required by local regulations, e.g. Canada, Switzerland, Singapour,... (see www.spuerkeess.lu/countrylist) Recommended if payment is not between two EEA countries* or is in a non-EEA currency**. Optional in all other cases
SEPA Credit Transfer (SCT) SEPA Credit Transfer instant (SCT Inst)	**Mandatory** if to a SEPA zone beneficiary outside the European Economic Area*** (Regulation EU 2023/1113) Always provided by Spuerkeess	Optional unless required by local regulation, e.g. Switzerland
SEPA Direct Debit (SDD)	**Mandatory** if collection from/to a SEPA zone third party outside the EEA*** Optional in all other cases	Optional
	Provided by Spuerkeess except for accounts with third-party banks****	Provided by the Customer

* 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 countries outside the EEA: Andorra, Monaco, San Marino, Switzerland, UK + other small territories belonging to countries in the SEPA zone
**** Please check with your debtor bank for the minimum data required for the debtor

Information on the debtor in transfers

For transfers where the debtor's name and address are mandatory, Spuerkeess automatically retrieves this information from its internal systems, provided that the debited account is held with Spuerkeess.

Note: If Spuerkeess is your intermediary bank*, please ensure that payment instructions also include the debtor's structured or semi-structured address by 15 November 2026 to avoid any rejection.

Information on the creditor in credit transfers

For transfers to countries outside the European Economic Area (EEA), Spuerkeess recommends including the creditor's address, as a growing number of countries now require this information.

As a debtor, you are responsible for structuring this data.

* Intermediary bank: refers to cases where you issue payments to debit third-party accounts registered in your Spuerkeess connectivity solution.

SEPA Direct Debits - SDD

The debtor's address is mandatory for SEPA Direct Debit (SDD) transactions in the following two cases:

- the creditor uses a bank established in the EEA for collection, while the debtor's bank is located outside the EEA,
- the creditor operates via a bank outside the EEA, regardless of the location of the debtor's bank.

Example:
Jean-Pierre Dupont, domiciled in Brussels (BE), grants British Energy Ltd., a UK company, a SEPA Direct Debit mandate authorising it 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 depending on the country?

For a list of countries requiring counterparty address details, please visit www.spuerkeess.lu/countrylist. This list will be updated as new jurisdictions introduce a requirement to provide the creditor's address.

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

1. City – The creditor's place of residence (name of city or locality).
2. Country – The creditor's country of residence.

These two fields must be completed in a structured format to ensure correct processing and avoid any rejection. Certain countries may impose additional formatting rules or require supplementary information, such as postcodes or province names. Always check the address requirements for the destination country to ensure compliance and avoid processing delays. You will find country-specific address requirements on the Swift website:
https://www.swift.com/swift-resource/252113/download

What validation rules will Spuerkeess implement to check address formats from 15 november 2026?

Spuerkeess will validate address formats in payment instructions as of 15 November 2026 (payment value date).

When an address is provided, Spuerkeess will verify at least the presence — but not the accuracy — of the country and city.
Any payment omitting one of these two elements will be automatically rejected.

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

The country code is validated according to ISO3166. The city name is not verified: its accuracy remains the responsibility of the ordering party.

Comment: Generic terms such as *NotProvided*, *non fourni* or *Unknown*, *inconnu* will not result in rejection of the payment, but may lead to processing delays and additional investigation costs, or even rejection by the beneficiary banks.

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

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

Which version of pain.001 should you use ?

The pain.001.001.09 format is recommended. View here: pain.001.001.09 V3.2 (ABBL) (ABBL Payments XML Customer Credit Transfer Initiation Message ISO 20022 V3.2).

What if you use MT101 message formats?

You must migrate to pain.001.001.09 as soon as possible and before 15 November 2026.

Benefits of migration to ISO 20022 and pain.001

The adoption of the ISO 20022 messaging standard — and more specifically the pain.001.001.**09** format for payment initiation — offers key benefits:

- Enhanced automated processing (STP)
- Reduction in manual intervention and error rates
- Enhanced data quality and integrity throughout the payment lifecycle
- Simplified compliance with global regulatory and control requirements

An overview of key deadlines

Customer channel	Agent of the debtor	Address of the party	Market deadlines	Spuerkeess deadlines	Customer action	Description of customer action
All global channels	Third-party bank	Debtor	15 November 2026	15 November 2026	Yes	Add the structured address of the debtor
		Creditor			Yes	Structure the address if it is present
Direct Connectivity (SWIFTNet, FTPS, SFTP, EBICS)	Spuerkeess	Debtor	15 November 2026	15 November 2026	Yes for SDD	Add the structured address of the debtor if the direct debit concerns a SEPA country outside the EEA
		Creditor		15 November 2026	Yes	Structure the address if it is present
Spuerkeess now supports both hybrid and structured formats for your transactions						

You can count on Spuerkeess to guide you through this critical technical transition phase.
Our team is available to address any questions or concerns you may have.

For more details, please contact isomigrationsupport@spuerkeess.lu