



## Take Steps now to avoid payment rejection – Counterparty Address Requirements and Payment Format Decommissioning

### Implementation of Structured Address Formats

A critical factor driving the success of ISO 20022 in the cross-border payments market is the implementation of structured address elements, such as street name, building number, town name, postal code, and country code. Financial institutions aim to reduce errors, improve sanctions screening, and accelerate transaction processing by adopting this standard.

New requirements related to counterparty addresses in payment and direct debit instructions will be implemented at ING by November 14 2026. You are strongly advised to take action to **avoid payment rejections** that could affect your business.

- Check your counterparty data to ensure that **at least** a town name/city AND a country code are present – see below table for applicability;
- Check your payment and direct debit initiation formats to confirm that these formats support the town name/city AND a country code in dedicated data elements, and make adjustments as required;
- Contact client services in case you need guidance or example files

The following table indicates when a counterparty address is required to be provided.

Transaction Type	Counterparty Address Required
Domestic Payments	No change
SEPA Credit Transfer	No
SEPA Direct Debit from within the EEA	No
SEPA Direct Debit from outside the EEA	Yes
International Credit Transfer and Euro Real Time Payments via TARGET2	Yes

When submitting a counterparty address in any case, **the minimum standard, from 14 November 2026**, will be to provide at least the town name and (ISO-2) country code in structured elements.

Non-compliance with these requirements will lead to rejection of your payment instructions.

### Address Formats

There are currently three options to deliver address information:

- **Unstructured** – Only unstructured address lines are used to submit postal address information. This is how most of our clients are submitting their payment and direct debit files today. **This format will no longer be supported from November 2026.**

```
<Cdtr>
  <Nm>BENEFICIARY NAME</Nm>
  <PstlAdr>
    <AdrLine>2468 BENEFICIARY STREET</AdrLine>
    <AdrLine>BENEFICIARY TOWN CA</AdrLine>
    <AdrLine>US 97531</AdrLine>
  </PstlAdr>
</Cdtr>
```



- **Fully Structured** – All address elements are delivered in their own data elements. In ISO 20022 pain.001.001.09 format, this would appear as follows:

```
<Cdtr>
  <Nm>BENEFICIARY NAME</Nm>
  <PstlAdr>
    <StrtNm>BENEFICIARY STREET</StrtNm>
    <BldgNb>2468</BldgNb>
    <PstCd>97531</PstCd>
    <TwnNm>BENEFICIARY TOWN</TwnNm>
    <CntrSubDvsn>CA</CntrSubDvsn>
    <Ctry>US</Ctry>
  </PstlAdr>
</Cdtr>
```

- **Hybrid** – Minimum Town Name (city) and Country Code are submitted in their own structured data elements, while the other address elements are submitted in unstructured address lines. There should be no duplication of data between address lines and the structured elements. In ISO 20022 pain.001.001.09 format, this would appear as follows:

```
<Cdtr>
  <Nm>BENEFICIARY NAME</Nm>
  <PstlAdr>
    <TwnNm>BENEFICIARY TOWN</TwnNm>
    <Ctry>US</Ctry>
    <AdrLine>UNSTRUCTURED BENEFICIARY ADDRESS 1</AdrLine>
    <AdrLine>UNSTRUCTURED BENEFICIARY ADDRESS 2</AdrLine>
  </PstlAdr>
</Cdtr>
```

### Payment Initiation Format Decommissioning

The following table shows current formats and their scheduled decommissioning dates. These formats are being decommissioned in line with structured address requirements in cross-border payments and ING's strategy to focus on a simplified ISO 20022 offering.

Format	ING Channel	Decommission Date
DTAZV	InsideBusiness Payments	November 2026
EDIFACT PAYMUL	InsideBusiness Payments	November 2026
MT100 CFA (CZ)	EBICS/InsideBusiness Connect, H2H channels - Multicash	November 2026
MT103	IBP CEE UA	November 2026
ISO pain.001.002.03	All Channels	November 2026
ISO pain.001.003.03	All Channels	November 2026
ISO pain.008.003.02	All Channels	November 2026

Clients who submit payment instructions using these formats and channels will be contacted in due course by our Client Migration Team to plan migration to an alternative format.



## **Mandatory Changes for clients using Insidebusiness Connect - EBICS through Czech local provider Management Data**

The deadline for usage of hybrid or structured addresses in counterparty data is November 14, 2026. After this date, the instructions containing **unstructured or insufficient hybrid address tags will be rejected** during validation on ING side.

ING Bank NV, Prague branch is closely cooperating with Management Data, the provider of your MultiCash connectivity to ING EBICS gateway, on the implementing of the SWIFT ISO 20022 pain.001.001.09 format for payment initiation and also of pain.008.001.02 for initiation of Czech Direct Debit requests. The formats will be made available for you soon. Management Data will contact you for update of your application. **We kindly ask you to inform us about your time preferences** - when your company will be ready to start with the migration.

We would like to also inform you about **important change**: for validation of hybrid/structured addresses accompanying the above-mentioned payment types, ING Bank N.V., Prague branch, will **no longer accept files that will contain instructions for both Domestic and International Payments**, unless the **Domestic Payments also contain Hybrid/Structured addresses**. We kindly request you to ensure that Domestic Payment Instructions and International Payment Instructions, including CZK payments outside Czech Republic, are submitted in separate files, if you are not able to provide Hybrid/Structured addresses of Creditors for Domestic Payments.

## **Mandatory Decommissioning of Swift MT101 Initiation Format via third banks**

If your company uses service of payment initiation via third bank, it becomes mandatory to use MX format pain001.001.09 in the interbank flow. It is obligation of your third bank to migrate to new format and if they need your company to make some changes in your bilateral communication, it is outside of scope of services of ING. However, we would like to remind that it is necessary to use Instruction Priority: High in the case you wish to instruct Urgent payment.

## **Mandatory Changes for Swift MT101 Initiation Format**

The current implementation of the MT101 may not support the minimum hybrid address structure for international and high-value payments and as such could lead to rejection from November 2026. In order to continue using the MT101 format as an import format into IBP or Swift FIN/FileAct/EBICS/ Host-to-Host channels successfully, upgrade your MT101 Field 59 (unstructured option) to 59F (structured). The same can be done, but is not mandatory, for Field 50. Below example shows the result of such an upgrade

```
59F:/<Account Number>  
1/<Counterparty Name>  
2/<Street name and Building Number>  
3/<ISO-2 Country Code>/<Town Name>
```

For example:

```
:59F:/NL12INGB012345678  
1/JAN SMET  
2/PARKLAAN 21  
3/NL/AMSTERDAM
```