



**COMMERZBANK**

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If your questions are not answered here, please write to us at [ISO20022@commerzbank.com](mailto:ISO20022@commerzbank.com).

# General

## **What is ISO 20022?**

The conversion to the ISO 20022 format as a new, uniform 'language' in global payment transactions represents one of the most sweeping changes to payment transactions ever made. Using this new worldwide standard, banks and their customers can professionalise payment transactions with an eye to significantly higher information value. Companies should adapt their IT systems accordingly to be able to derive business benefit from the 'more' of information gained. We place our expertise at our customers' service.

## **Why is the new standard being introduced?**

ISO 20022 is being introduced as a new international standard in an effort to reduce complexity. Still, the path that leads from today's 'actual' to tomorrow's 'target' should not be underestimated. The future goal is to use identical data in the payment order, log and account statement. This reduces complexity, promotes stability, facilitates speed and optimises settlement.

## **What are the biggest challenges to customers during the conversion?**

The biggest challenge is the conversion to the new formats. Along with the updating of systems, this also results in an adaptation of the master data and the existing processes.

## **When do I need to convert to ISO 20022 by?**

We have stored an up-to-date overview of the planning schedule for you in our portal for corporate customers. ([Conversion timetable for account information \(commerzbank.com\)](https://www.commerzbank.com/iso20022-timetable))

## **What benefits does ISO 20022 offer businesses?**

The benefits of the conversion lie not only in the growth and structure of the information on the account statement but also in the more accurate instruction of foreign payments, for example. There are now specially defined fields available for use in sending country-specific features to banks. All of this reduces follow-up queries, delays and manual effort. Processes can be automated more easily on the receiving side as well.

## **How certain is an end date scheduled for November 2025 or 2026?**

As a bank, we are also already required by law to provide you with statements containing more comprehensive data – as will be increasingly expected in the future. This can only be achieved with the current camt format and cannot be put off. In the case of bank transfers, the adjustments cannot be made until 2025. The end date has thus been postponed by one year to prevent a 'big bang'. Commerzbank does not anticipate any further postponement at this point in time.

The procedure for SEPA has not yet been finalised.

## **How long will this format version remain in use?**

It can be assumed that changes in format will be made on a regular basis in the future.

## **What exactly do I need to ask of my banks?**

You must ask which formats can already be used or delivered. Are the order types reported in the existing bank authorisations, and are there bank-specific features, e.g. in the order types?

### **How would an ISO 20022 migration look in my company, for example?**

The conversion to the ISO 20022 standard in your organisation would entail a series of steps and actions. These can vary based on the specific requirements involved, the size of your business, and the complexity of payment transaction activities.

Model steps for an ISO 20022 migration in your company would begin with a comprehensive analysis of your current payment transaction processes, payment systems and file formats. What changes are required? You should draw up a detailed conversion plan that takes the resources and time frame into account. Then you will carry out the necessary adaptations to your payment transaction and accounting systems to support the ISO 20022 standard. This might involve updating software, configuring databases and implementing new interfaces.

You will notify your business partners, customers and suppliers of the upcoming changes in payment transactions and see to it that they are in a position to support and avail themselves of the new ISO 20022 standard. You will then conduct tests and validations to verify that your payment transaction processes and systems interoperate correctly with the ISO 20022 standard. We at Commerzbank will be pleased to assist you with these steps.

### **Is ISO 20022 a global matter, or a European one?**

Migration to ISO 20022 is essentially a global topic. There may be local variations in the timing of implementation and the procedures used. Speak with your local bank partners about this.

### **Does the new ISO standard also apply to other countries with similar formats?**

The ISO format provides a large number of fields to provide the broadest possible support for local payment transactions. So local adaptation of information will always be required in spite of the shared components for the format.

### **Do I have to conduct the test individually with each house bank, or will a SINGLE test at a house bank suffice?**

For security's sake, we recommend testing ISO 20022 with non-critical payments or a 'penny test' with each bank. The dates for the conversion may vary (e.g. when accepting foreign payments in XML format of order type AXZ).

### **Where do I obtain the format descriptions?**

The format description for the payment files can be found on the website [www.ebics.de](http://www.ebics.de).

### **When can the set-up of interfaces/migration begin? What is the date from which ISO 20022 can definitively be used?**

You can begin with the implementation now. Commerzbank has been providing you with account statements in camt53.001.08 format for some time now. Payment files (DK standard via order types CCT, CDC, CCU) have been possible since 18 March 2024. Submission of the new format for foreign payments via AXZ will be possible in the near future, beginning in summer.

### **Is conversion to ISO 20022 irrelevant if I convert to SWIFT Corporate as a general matter?**

No. Like EBICS, Corporate SWIFT access is a channel for transmission and access.

### **Do new contracts also need to be concluded for the receipt or dispatch of the new formats (e.g. for EBICS)? Are you approaching customers with this?**

No. We can make the conversion or the provision of parallel formats as soon as you ask us to transmit the new formats. The necessary EBICS order types are automatically added if the user already has authorisations in place for AZV or STA.

**Will the old format still be supported if the conversion is not completed by November 2024? How long will support for the 'old' ISO 20022 formats continue when a new version is published? Or is there a firm deadline for the switch to a new version?**

Essentially, the old version will remain compatible with the old format version for as long as possible. Given the necessary structuring of the addresses, however, the end of 2026 will mark a regulatory limit.

**Is it possible to circumvent ISO 20022, or will this standard be mandatory for businesses in the future?**

As with the conversion to SEPA, the conversion to the new standard does not offer an 'opt-out' provision.

**Are all national banks already in a position to process ISO 20022?**

All banks should support the formats that have been adopted in the German banking industry. Peculiarities in acceptance may be encountered on occasion, however – e.g. with use of the new format for foreign payments (order type AXZ). Speak directly with your banking partners about the current status of implementation.

**Which of the departments within businesses should be involved in implementation, and what might implementation look like in practical terms?**

Implementation involves external service providers (tax office, payroll office), financial accounting, IT and the human resources department – essentially all of the departments that come into contact with the generation or settlement of payments.

**Will points of EBICS access remain as is, or will they need to be changed?**

The points of access will remain the same, with the new order types (AXZ, C53, C52, etc.) added. When instructing SEPA transfers with the CCT order type, everything remains in the form to which you are accustomed.

**The problem we often currently face is that foreign banks do not support EBICS. Will this be resolved in the future, and if so, how?**

EBICS is a standard predominantly in use in Central Europe. SWIFT access represents an alternative to this on the global level. All of the Commerzbank branches abroad, on the other hand, along with our subsidiary in Poland – mBank – already provide extensive support for the access channel via EBICS.

**Do you know the extent to which the 'big' providers of banking software or accounting programs are involved? Are the classic ERP systems going along with these developments, and are they already making payment formats available in the new pain version?**

Please contact your respective provider in this regard and discuss the conversion process with your local point of contact. This is very customer-specific. As a bank, we will be pleased to assist you with this.

**Our company processes all payment transactions, accounting and payroll accounting via the DATEV software. This must also be the case in many companies. Do I need to do anything here too? Or does DATEV have an obligation to undertake the adjustment?**

Speak with your contact at DATEV in this connection here regarding the extent to which they can process the new formats.

**Has the banking sector already apprised ERP system providers such as SAP of the need for change and raised their awareness in this regard?**

The system providers are aware of the conversion. Please speak with your contact person about the current migration status.

**Payment transactions are made directly from the software in use in the general accounting department. In this case, the conversion must be made by the software manufacturer, or is there still something I need to do?**

Because you are the one populating the software with ISO-compliant data, you may need to obtain these data in advance. You must actively instruct the bank to convert the account information. This makes it imperative that you speak to both your software provider and your banks.

**Are the old formats also valid for Commerzbank USA or for payment transactions with the USA?**

For your account in the USA, currently you are requested to issue the instruction via pain.001.001.03 or the local formats via portal access. We will notify you separately of any changes in the USA.

**Is there already a timetable in place indicating when foreign Commerzbank locations can use the new formats?**

The dates for the conversion abroad have not yet been set (as at March 2024). The foreign locations can already deliver camt.053, but with deviations compared to a camt.053 for German accounts. Direct coordination with the foreign branch is required.

**Why not switch directly to CGI?**

CGI involves jointly developed recommendations for the allocation of ISO 20022 formats to ensure uniform processing of customer files across banks. For example, CGI features rules for local payments in individual countries, but also a rule for the allocation of SEPA payments. As CGI files can contain essentially all methods of payment, processing at a bank requires additional steps for checking and possibly splitting the file. This calls for a commitment of resources and time. If files regarding the specific order types are delivered – e.g. CCT for SEPA transfers – significantly quicker processing is possible. Particularly where large files involving bulk payments are concerned, we strongly advise against submitting them as CGI.

**Our company receives messages from some banks via the SWIFT FIN channel alone and sends all messages via this channel as well. This does not permit the processing of XML files, however. Can you please comment on how we can still implement the ISO 20022 requirements without having to switch to FileAct?**

The transmission of XML files at the message level in SWIFT occurs via InterAct. At the moment, only banks are permitted to do this, but not corporates. The approach to be taken in the future is currently under discussion.

**Is there a linkage between this topic and the legal requirement of invoicing (currently from 1 January 2025 in Germany)?**

No, these topics are independent of each other.

**We work with Multicash, where we generate the account statements for various banks and execute payments and direct debits. We also have to make foreign payments from time to time. Do we need to contact Multicash with regard to the ISO migration?**

Please contact the bank through which you purchased Multicash or contact the manufacturer, Omicron, directly.

**Our Commerzbank current accounts are integrated in SFirm. How does the conversion work here in cooperation with the Sparkasse savings bank?**

Please check with your savings bank to determine whether you need an update for SFirm.

**The service provider for our IT within the company is not developing any up-to-date operating software for the conversion to ISO 20022 at this point in time. Is there still something we can do in advance?**

Be certain to have the service provider confirm that the timetable for the conversion is within the expected timeframe. You may already be able to clean up your master data for structured addresses, if this is necessary.

**We use Proficash as a payment transaction program for all our banks (for payments, account statements and transaction queries). What do we need to do in this case?**

Please coordinate with the software manufacturer or bank through which you received the software.

**We will be changing our payment transaction software on 1 January 2025. Will converting to ISO 20022 then suffice, or should a conversion still take place in the old system?**

In principle, after the conversion on 1 January 2025, you will still have enough time until the old formats are deactivated in November 2025. At the same time, however, please check to determine whether any other systems or programs in addition to your payment transaction software are affected as well, and may need to be converted.

**Is EBICS 3.0 required to use the new ISO formats (pain.001.001.09)?**

No, the EBICS standard is a standard for transmission and encryption. There is no restriction on transmission.

## Account information

**Is it advisable to switch from MT940 directly to camt.053 in version 08?**

Yes, the conversion to camt.053 should be commissioned from your banks in version 08 straight away. This applies to new agreements as well. Please check with your software provider to determine whether the product used also supports camt.053 version 08.

**Can all electronic banking programs now already process camt.053 version 08?**

In principle, yes. Please discuss with your software provider.

**Will existing MT940 or camt.053 version 02 agreements be converted automatically to camt.053 in version 08?**

There is no automatic conversion. As of today, we will deliver camt.053 in version 08 as soon as you ask us to provide it. No final decision has been taken yet regarding the extent of automatic delivery in the future. Commission the conversion through points of contact known to you.

**I am already using camt.053 in version 02 and would like to receive camt.053 in version 08 parallel to this – how do I need to proceed?**

Parallel provisioning can lead to challenges if the same order type is used in call-up. To ensure a smooth process, please get in touch with your contact person at Commerzbank.

**Is version 08 of camt.053 valid worldwide?**

Yes, version 08 of camt.053 is valid worldwide, and an exchange with third-party banks is possible exclusively in version 08.

**Is a camt.053 file created per account, or are several XML files combined as a bulk file?**

There is no change to the existing procedure here. There is a separate camt.053 message for each account. Depending on the communication system in use, messages can also be transmitted in a zip file.

**I receive extracts from a third-party bank in MT940 format via Commerzbank. Are these then converted to camt.053 version 08?**

No, incoming account statements from third-party banks will be forwarded without conversion. You must commission the third-party bank to perform the conversion to camt.053 version 08.

**If a third-party bank converts from MT940 to camt.053, will the statements be automatically matched with my company?**

No, to do this we need information from the third-party bank so that we can adjust your data accordingly. As a rule, the third-party bank also needs information for delivery. Sample documents are already available to simplify the task of contacting your foreign bank. Please feel free to speak with us on this topic.

**Which camt.053 version should a third-party bank deliver?**

Given the requirements of SWIFT, banks can only exchange data in version 08.

### **Can Commerzbank already deliver camt.053 account information to other banks today?**

Yes, this is possible and must be commissioned separately. An agreement to this effect between Commerzbank and the third-party bank is a necessary prerequisite. To do this, please contact your known contact person at Commerzbank.

### **What happens with my bank statements that foreign banks send to Commerzbank? Can the statements be converted?**

By way of clarification: We offer a service that involves collecting bank statements from banks abroad for you and then making them available to you through your EBICS access with us. This way, you can monitor the balances of your accounts abroad at all times.

Since SWIFT plans to discontinue its use of MT formats beginning in 2025, a switch to camt formats is inevitable, in our view, and conversion is not an option.

We can already receive bank statements in the new format for you and transmit these to foreign banks as well. As experience shows, some banks abroad are not prepared yet, and widespread conversion to the new camt formats is still a bit sluggish. Speak with us – sample forms for instructing your foreign banks are available.

### **How do I know if I am using the new camt.053 version 08 or the old version 02?**

Open the file in a text editor. The version is also displayed in the header – i.e. in the first line. The header should contain 'camt.053.001.08'.

```
▼<Document xmlns="urn:iso:std:iso:20022:tech:xsd:camt.053.001.08" xmlns:x
  ▼<BkToCstmrStmt>
    ▼<GrpHdr>
```

### **Commerzbank uses the camt.053.001.02 format for account statements. How long will version 02 be supported in SWIFT? When do you plan to switch over to the more current format?**

Transmission via SWIFT (= InterAct) is already no longer possible: transmission here works with version 08 only. Commerzbank also offers this via the other transmission channels. Most changes and updates will occur in version 08. A decommissioning is not yet planned at this point in time. The focus should be on converting from MT formats to camt, with the latter preferably in version 08.

### **We process MT940 files from a variety banks (throughout Europe) and often notice differences in some fields. How will this affect the new format? Is there still 'bank-specific content' there, or can we assume there is truly standardised processing across all banks?**

ISO 20022 is a broad standard and leaves a great degree of freedoms for banks internationally. With this in mind, the DK (German Banking Industry) has also decided to institute restrictions and to make more detailed specifications in the agreement on remote data transmission. As a result, all camt issued by German banks should be very similar while complying with broader international standards at the same time. Still, the camt specifications are standardised to a far greater degree than the old MT formats and permit less 'bank-specific content'.

### **When will MT940 be made available at Commerzbank?**

SWIFT support – and hence the option of transmission via SWIFT channels – will no longer be available beginning in November 2025; this also applies to account statements of third-party banks. Standardisation via the German Banking Industry will be eliminated in November 2025 as well (cf. the agreement on remote data transmission). Commerzbank will no longer make any adjustments to MT940 either. Even if there is currently no official end date, this can be expected by late 2025. We are engaged in discussions to this effect in the DK committee.

### **What happens to the generation of account statements if particulars for the street address or postal code are missing? Is this information mandatory for the generation of payment transactions?**

Payment partner address data are already no longer displayed in camt. These data must be processed by the payment systems, however.

**Once Commerzbank accounts have been converted to camt and are running successfully, does this also work for bank statements from other banks as well, or should we start a project of our own for this purpose?**

The camt files routed via SWIFT are very similar to the formats we provide. But some features are specific, such as the size. Third-party bank statements may not exceed a maximum of 80 KB in size, for example, after which there is a split. This means: A normal camt has roughly 15,000 transactions, whereas a third-party bank statement has around 80 transactions before a split.

**Will Business Transaction Codes change when the format for account statements switches from camt 02 to camt 08? Will this require new mapping in the ERP system?**

No, the ISO BTCs will not change with a change in account statement version.

**Can there be differences in format if, for example, the bank still receives a payment in the old format (and thus does not provide the entirety of information) but the bank provides the account statement in camt?**

This is theoretically possible but will not be the case very often.

**Will it be possible to obtain partner-bank information and bank-account numbers in the camt formats? Some banks include this information in MT940 format, which simplifies allocation to the customer.**

Only the payment partner's IBAN is included.

**In what format will pre-booked items be delivered in the future?**

MT942 was previously available for intraday turnover (pre-booked items). In the new ISO 20022 world, camt.052 is issued for this purpose.

**Will this make the text on account statements infinitely long, with lots of structured fields displayed there?**

The scope of the intended use is theoretically unlimited under ISO 20022. This is not practical, of course. A structure of 999 x 280 characters are possible here through SEPA, and 9,000 characters through SWIFT InterAct. Commerzbank has recommended a limit of 50,000 characters.

**What happens if I use more than 140 characters for the intended use (the new format permits up to 9,000 characters) but the recipient still uses MT940 or a camt version that cannot display the additional characters under the intended use?**

This will lead to a severe truncation of the text indicating the intended use.

**Is camt.054 also affected by a new version?**

Yes, camt.054 also has a version 08 as an update over version 02.

**From what date can third-party programs be used to retrieve the new camt account statements, and what are the determining factors?**

Many electronic-banking programs already have camt-retrieval capability. Please get in touch with the software manufacturer.



## GVC to BTC

### **Will the three-digit GVC (Transaction Code) also be available in the camt statement in the future, and can I use it?**

There are currently no plans to decommission the GVC – neither by us nor by the German Banking Industry (DK). Updates are theoretically possible, but always based on the ISO BTCs, which are determinative. GVCs will initially continue to be issued in camt. Hence, we recommend using the ISO BTCs as control parameters for mapping logics.

### **Are the BTCs identical across all banks, and are they obligatory for all European banks? Including for Switzerland? Do all banks already deliver the new BTCs wherever camt is issued?**

The BTCs (= Business Transaction Codes) are set by SWIFT and are standardised (= also known as 'ISO BTCs'). The ISO 20022 standard accordingly specifies which BTCs must be used. As ISO 20022 is a global standard, this also applies worldwide. GVCs, on the other hand, are only a German standard promulgated by the German Banking Industry (DK).

### **Are the GVCs the same as the new BTCs?**

No. Reliable mapping is not always possible. Due to their nature, the ISO BTCs offer far more options than the old GVCs. Under the more recent mappings, the ISO BTC is always authoritative, and the effort is to try to find a valid GVC for the ISO BTC. As the ISO BTC is also an international standard, it should be issued internationally by all banks.

### **What are the exact requirements when converting GVCs to BTCs?**

It depends on the system you are using. The mapping list for ISO BTC to GVC is helpful in this regard.

### **We have lots of filters for processing bank statements in the ERP system. Does it make sense to change the GVCs to BTCs by collective revision, or might it not make sense to do this, in light of the large number of BTCs? Is a manual adjustment perhaps required here?**

Since this does NOT involve a 1:1 mapping, i.e. a collective revision, we think this is a critical point, as different GVCs could theoretically be assigned to the same ISO BTC here.

## Global Payment Plus (GPP)

### **Do customers have to perform an authorisation call-up after we have assigned the new order type for foreign payments (AXZ instead of AZV)?**

Yes, this is necessary. You can launch this directly in Global Payment Plus. If you have any questions concerning authorisation call-up, our colleagues in Digital Banking are available to assist corporate customers from Monday to Friday from 8.00 a.m. to 6.00 p.m. on +49 (0)69 136-26360.

### **Can I receive parallel statements in both MT940 and camt.053 format in GPP?**

Yes, that is possible. Please coordinate this with your contact person at Commerzbank.

**What must be done if serving multiple different third-party banks in GPP?** In this case, please speak with each of the banks involved. We recommend a bank-by-bank conversion. In principle, we keep the Global Payment Plus updated to reflect the latest regulatory developments.

### **How long can legacy formats be submitted? Can Global Payment Plus convert legacy files to the new format to permit extended use of legacy formats?**

We will support the legacy formats for you for as long as regulations permit. We will keep you apprised of data on discontinuation in a timely manner. Unfortunately, we cannot guarantee acceptance beyond the end of 2026 due to specifications relating to structured data. In our view, banks will not offer conversions from unstructured to structured data. We recommend early conversion in your systems or getting in touch with the manufacturers of your software solutions or your service providers.

### **How am I affected if I use your Global Payment Plus to submit payments?**

If you enter a payment order directly in GPP, you must complete the mandatory fields. If you upload a file, it must be adapted to the new format.

### **Will the update activate new master-data fields to permit storage of a structured address, or will the old address be adapted to the new requirements? Does master-data maintenance have to be performed manually, or does this occur as a result of the update?**

The entry of structured addresses will be possible in GPP by the end of Q3/2024. Existing templates will also be migrated to the new address structure in Q3/2024.

## **Payment transactions**

### **Can you convert payment orders?**

Where conversions are concerned, the crux is the address: an unstructured address that is structured differently depending on the country cannot easily be converted into a structure. This is why we are critical of conversion solutions and do not expect an offer here.

### **How long can pain.001.001.03 remain in use? Is a change to the pain.001.001.09 version mandatory? At what point must the change take place?**

As the rulebook in which a SEPA transfer in the pain.001.001.03 version was last defined describes address information in an unstructured manner, and because unstructured addresses will not be permitted in future interbank transactions, the legacy version must be terminated. As there is no update for a legacy version, this adjustment also affects customers who do not disclose address details in SEPA.

### **What are the specific changes involved in updating from pain.001.001.03 to pain.001.001.09?**

We have made two major adjustments to the formats. In the legacy version, each field in which a BIC is specified is designated with <BIC>. In the new version, a distinction is made between the BIC, which always designates a bank, e.g. in Debtor Agent (client bank) or Creditor Agent (recipient bank), which is referred to there as <BICFI>, and the BIC, which can also have a company registered with SWIFT, e.g. in the group header as an Initiating Party. This is now known as <AnyBIC>.

The second material change concerns the execution date. In the legacy version, the execution date is shown in the <ReqdExctnDt> tag. The introduction of Instant Payments made it possible to specify a date <Dt> or timing that shows a date and the time of day <DtTm>. Whereas only one date is possible in SEPA and for international payments, for example, this is now indicated under <ReqdExctnDt> <Dt>. Even if the format has been subjected to all manner of other adjustments to details – e.g. you can assign a UETR yourself for an urgent or foreign payment and record it with the payment – it is the first two changes that need to be considered when creating each new payment. Within the ‘blueprint’ specified by ISO, the rule books now define how the file is populated and which elements are permissible or mandatory. This, for example, is where the topic of structured addresses, which we have described elsewhere, is addressed.

### **Is pain.001.001.09 for SEPA payments different from pain.001.001.09 for foreign payments?**

SEPA:

The EBICS order type remains the same; hence, there are no adjustments and no need for new ‘authorisations’ when submitting files relative to the file. The material changes in this case are the ISO-driven new version, pain.001.001.09, and the associated adjustments in file structure, as described above for BIC and the execution date.

Very often, we do not see any addresses in SEPA. But if you specify addresses, there is a requirement in the rule book no longer to specify the address in structured form in the <AdrLine> tag, but in the structured tags instead. (Adjustments from 11/2025 semi-structured)

Express XML (CCU):

With regard to the EBICS order type, the same procedure applies here as with SEPA.

The previous format is based more closely on SEPA than the future one, but SEPA still serves as the basis for the new format. However, there are more rejections than before. The fee schedule here is stated in the new SHAR format (legacy format: SLEV). A UETR can be entered here. If Ultimate Debtor/Creditor is used, a

(structured) address is always required here (in SEPA, Ultimates are always shown without an address). Ultimates could be submitted in the legacy format; according to the rule book, however, they were not included in the outgoing message.

Foreign payment:

Here we have a format change from the fixed-length DTAZV format to an XML message (pain.001). The order type for DTAZV is AZV, while the new order type for the XML format is AXZ. On the bank side, we will submit the same authorisations for AXZ as for AZV. This does not require a separate reporting process.

Most information from a DTAZV file has a unique equivalent in XML format. Some instructions can be written in a 'common' field in the DTAZV. For example, INTC and CORT are placed in the Purpose category, while HOLD, PHOB or TELEB are placed under Instruction for Creditor Agent, with PHON and TELE placed under Instruction for Debtor Agent. In the future, the fee instructions of BEN, OUR and SHA previously in use will be called CRED, DEBT and SHAR.

### **Does Commerzbank offer test files for the new pain.001.001.09 format?**

Sample files are available on the website of the German Banking Industry, under [Ergänzende Dokumente – EBICS](#).

### **Is a UETR assigned to every payment order?**

Depending on the payment type involved, orders are assigned a UETR by the bank, provided that the UETR was not already included when the order was placed. The UETR (Unique End-to-end Transaction Reference) is a unique reference designed to facilitate call-up of the current status.

### **We have Request for Transfer (MT101) payments which we transmit via Commerzbank using payment software. As at what date will these payments be converted? Is the conversion a function of the bank executing the payments? How will the conversion be made for these payments?**

The conversion also affects 'Request for transfer' transactions under which payment orders are submitted to Commerzbank and charged against accounts held with other banks. The term 'Relay' has become established for transactions of this type. The successor to MT101 in this context is pain.001 (Relay). This is a format similar to that for foreign payment, but it can only contain a single payment per order. Commerzbank will adopt this format in 2025. The extent of the need for adaptation varies greatly depending on the particular customer. We will inform the affected customers of the conversion in good time. Generally speaking, these payments are also provided with a UETR when sent to the bank where the account is held; this makes them easier to track. Logging with a pain.002 is also significantly more extensive here than the current log based on MT101.

### **Is there a feature for end users that permits tracking of the payment history in real time using the UETR?**

Payment tracking based on the UETR will be offered as an API in a first step. In an expansion stage, the functionality will be integrated into the portals and offer the option of querying the current status of a foreign payment.

### **Is it correct that ISO 20022, for example, provides the intended uses with larger fields (fields permitting more information)? Will the new transfer format make it possible to provide more information, e.g. 20 invoice numbers, in order to save oneself a payment advice note?**

As is customary today, the intended use can be indicated in unstructured form, but also in a very comprehensive, structured form. In the future, it will also be possible to transfer several structured VWZ elements with one payment. This can open up new possibilities for automatic further processing. This only makes sense, however, if the sender and receiver have agreed on a use in advance.

### **Are payments made in real time as well as abroad?**

With SEPA, payments go into clearing at several points throughout the day, and Instant Payment always aims for immediate execution within 10 seconds, foreign payments are processed on a continuous basis. If the payment has passed all checks within the bank, it is typically sent to the recipient bank immediately afterwards. Hence, many payments can already be found in the recipient bank within an hour of their submission. Numerous checks are now also required there before the payment can be credited to the recipient account.

Towards the end, it then becomes relevant whether or how the recipient receives information about receipts during the course of the day.

**Are there differences in the way structured address data are checked for SEPA CORE and for SEPA Business-to-Business Direct Debit?**

No. A syntax check is always performed (format structure/mandatory fields). Commerzbank does not perform a substantive check (exception: valid country code).

**Is a direct-debit file returned in its entirety in the event of an error in the address, or is it not executed for the payment in question?**

If address particulars are included in a SEPA file, at least the city and country are mandatory fields in the new version. If there is an error in the file structure, this leads to the rejection of the file. In terms of substance, the only check performed is to determine whether the country key is valid. If it turned out to be invalid, this would also lead to rejection. All other substantive errors would be passed on with the debit.

**Is the customer's structured address required for a debit within Germany?**

No. The German Banking Industry recommends completely refraining from providing addresses for SEPA transfers and SEPA debits within the European Union.

**If there are changes in debits, is there a format description of ISO 20022: tech: xsd:pain.008.001.02 pain.008.001.02.xsd on ISO 20022:tech:xsd:pain.008.001.09 pain.008.001.09.xsd?**

The debit is adapted to pain.008.001.08. The format description for the new format can be found under Spezifikation für Datenformate (Anlage 3 des DFÜ-Abkommens) – EBICS.

**What aspects must be kept in mind with the SEPA direct-debit scheme? Do SEPA direct-debit mandates (basic and B2B) remain valid, or does something need to be changed?**

All direct-debit mandates remain valid. The only change is in the version of the submission format.

**What exactly changes in the logs?**

Today, as a rule, logs are called up in the form of a PTK text file. In the future, the logs will be in pain.002 XML format. You will find additional information under Remote data transmission ([commerzbank.com](https://www.commerzbank.com)). Technical details for transmission via EBICS pending verification of the electronic signature can be found under EBICS-Standard – EBICS. The description of the logs for a substantive check can be found under Spezifikation für Datenformate (Anlage 3 des DFÜ-Abkommens) – EBICS.

**What exactly is pacs.008.001.09? Is this format related to the log?**

pacs.008.001.09 is the format for transfers in interbank clearing. The format has no relevance for customers.

**Will the logs contain checksums in the future?**

No.

# Foreign payment transactions

## **When can Commerzbank begin accepting AXZ (pain 001.001.09)?**

The launch is currently scheduled for June 2024.

## **Is it possible to commission foreign payments parallel to one another in DTAZV and XML format?**

Yes, parallel operation is possible without problems until the final shutdown date of the legacy format.

## **Today, the DTAZV features equivalent-value payment. Will this also exist in the future, and can the fee instructions of OUR, BEN and SHA continue to be included?**

The new ISO format has fields of its own for many substantive topics.

The amount usually looks like this:

```
<Amt>
<InstdAmt Ccy="USD">112.72</InstdAmt>
</Amt>
```

If users want to make an equivalent-value payment denominated in euros in the future, the amount field will be structured as follows:

```
<Amt>
<EqvtAmt>
<Amt Ccy="EUR">112.72</Amt>
<CcyOfTrf>USD</CcyOfTrf>
</EqvtAmt>
</Amt>
```

It is important that only the euro currency is allowed for equivalent-value payments denominated in euros in the </Amt> tag.

The fee instruction can be found in the <ChrgBr> tag. As before, the value SLEV must be specified there for SEPA. In the legacy version, the approach to express payments in euros was similar to SEPA. In the new version, the value SHAR must be specified for the sharing of fees. In addition to this value, the foreign payment also permits the values DEBT (formerly OUR) and CRED (formerly BEN).

## **Will the new ISO formats accelerate the transaction speed for foreign payments?**

The change in format has no direct influence on payment speeds. The new structure offers the option of storing information in a more precision-tailored way and reacting accordingly. In certain constellations, this can lead to faster processing. Specifically, compliance checks with a structured address are more effective here. Other factors, such as the routing through which the sending bank reaches the receiving bank, are more important for speed. This is irrespective of the format used, however.

## **Do customers need to create a separate foreign-payment format for each bank, or have the banks agreed on a uniform standard? What happens if foreign banks do not support the new DTAZV format?**

The format is uniform worldwide for banks that exchange foreign/currency payments amongst themselves (PACS formats). Building on this, the banks' task is now to reach an agreement with their customers as to how to place orders for these foreign payments. This is typically dealt with through messages in the pain.001 format. In Germany, banks define customer formats for all banks in accordance with the specifications of the German Banking Industry (DK). The formats are published on [www.ebics.de](http://www.ebics.de) under the 'Formate' heading. At least for Germany, this permits the creation of a uniform, cross-bank format. In view of the dependence on the interbank format, however, it can be assumed that similar formats are defined worldwide. The familiar DTAZV format then becomes pain.001. A format like this should be offered by every bank, including banks located abroad, by the end of 2025. The exact date of introduction may vary from one bank to the next, however. You can enquire as to your respective bank's progress towards the conversion and as to any special bank-specific conditions.

**The American banking system poses special requirements for payments made to the USA. Are these requirements covered?**

The FedWire code in the USA is similar to the German bank code (Bankleitzahl). This was previously indicated with //FW021000021. Essentially, the following applies: if you have a BIC, you should not use the FedWire code. Some banks in the USA do not have a BIC, however. In this case, the information must be provided as follows:

```
<CdtrAgt>
<FinInstnId>
<ClrSysMmbld>
<ClrSysId>
<Cd>USABA</Cd>
</ClrSysId>
<Mmbld>021000021</Mmbld>
</ClrSysMmbld>
<Nm>Jpmorgan Chase Bank</Nm>
<PstlAdr>
<TwnNm>Tampa</TwnNm>
<Ctry>US</Ctry>
</PstlAdr>
</FinInstnId>
</CdtrAgt>
```

**What is the situation with international transfers with intermediary banks?**

The payment routing is typically determined by the bank. If you have reached an agreement with your bank permitting you to make certain specifications yourself, the elements <IntrmyAgt1> and <IntrmyAgt2> are available.

**I've heard that a new field must be used in the new payment-file format for payments abroad that require a purpose code. How does one provide a purpose code for the countries that require it?**

The ISO format offers a variety of elements with different meanings for this purpose. 'Category Purpose' refers to the field in which, for example, group payments are marked with INTC. This may impact payment execution. There is also a 'Purpose Code', which is more reflective of a categorisation of the payment. This is intended for the client and recipient and has no effect on the payment. Also referred to as 'Purpose Code' are some of the disclosures that regulators in the recipient's country expect. These disclosures are located in the 'Regulatory Reporting' block. Please contact us if you are uncertain of how to proceed with regard to a specific payment.

# Structured addresses

## **How long can unstructured addresses be used?**

This depends on the format version in use. Only (semi-)structured addresses are permitted in the pain.001.001.09 version.

## **What changes will occur for foreign payments?**

Essentially, the format for foreign payments will change from a fixed-length format to a structured XML format under ISO 20022. Some information – but not all – can be incorporated into the new formats. In some cases this might not be possible, particularly where the recipient address is concerned.

## **What changes will occur with the electronic account statement?**

Even if we encounter structured addresses in different places, the main challenge is faced by the recipient (creditor) of transfers and, in some cases, by the ultimate creditor. Addresses are only displayed in the account statement; the client (debtor) is usually entered once in the master data. However, the payment recipient is generated anew for each payment, and the address must be generated from own data sets. The address is required especially if the payment leaves the EU or the EEA. This is often the case with foreign payment transactions. In this connection, please take into account the following: even if the payment recipient is located in the EU, but the payment is denominated in a non-EU currency – e.g. in a payment to Austria in USD – the message leaves the EU, and an address is required.

## **Is the topic of structured addresses relevant for SEPA payments as well?**

With SEPA, an address is required, especially for payments to the UK and Switzerland. We recommend omitting the address for payments within the EU.

## **What does the structured address look like, and which fields are mandatory to complete?**

The town/city <TwnNm> and country <Ctry> must always be disclosed. These elements are also found in each address. For all other fields, there are own elements that can be written in separate fields. Beginning in November 2025, information for which you do not have fields of your own in your data source can be entered in an 'unstructured' field. Since different fields are required for both the different address types (e.g. P.O. Box) and procedures, nearly all fields are optional. The remaining technical requirement is to provide a valid postal address. The optional fields give you design flexibility. However, this does NOT mean that you can forego everything else. Country-specific features can be found on the SWIFT website: <https://www.swift.com/swift-resource/250266/download>.

## **Should umlauts (ä, ö, ü, ß) be omitted when addresses are entered, or may these be included?**

Interbank formats do not provide for umlauts. If necessary, these are replaced by a vowel or a space. Therefore, it is advisable not to include umlauts with the payment order, so that the recipient receives the same thing you sent as the sender.

## **If the address structures are simplified again in late 2025, do I still need to be able to complete the structured fields in advance? Or can I spare myself the added effort?**

Here it is best to consider the structure in which you store the addresses in your systems today. If this structure is a 1:1 fit with the requirement for structured addresses, then there is nothing against beginning the conversion directly. But if you discover, for example, that you can meet the structural requirements in 90 percent of cases, but still have an array of data that do not correspond to the structure – e.g. because relevant information such as street vs. P.O. Box, building name, etc., are not stored in separate fields – then you should check to see whether introducing the unstructured field <AdrLine> resolves the issue. If this is the case, it is advisable to wait with the conversion until November 2025.

**Do all address details (street, house number, etc.) actually have to be provided in order to execute a payment? What happens to payments for which the address data are incomplete? Will these be processed or rejected?**

The structured address mainly facilitates checks in the embargo and compliance areas. The systems in these areas have managed to handle unstructured information in the past, and from 2025 they must be able to deal at times with unstructured information in the <AdrLine> field. The more accurate the prepared data are, the faster and smoother their processing will be. How exactly these systems conduct these checks, and when checks are automatic or manual, is usually not disclosed. A technical rejection due to incorrect or incomplete address data is currently not planned in the payment transactions system. The large number of address variants, with numbers in street names, postal codes instead of street addresses for major customers, etc., makes a technically reliable validation very difficult here. We would therefore assume that address data of poor quality do not prevent payments as a rule, but that they increase the risk of follow-up queries or rejections. The exception to this is the two-digit ISO country code in the <Ctry> tag. Anything indicated here must be a valid value.

**Are the addresses provided those of the supplier or those of the banks?**

For nearly all of our international payments, the recipient bank is designated with a BIC. If the BIC is not known, which rarely happens, we also receive payments in which the bank is specified by name and address. Here, too, the same address specifications always apply. As the information provided here tends to be used by the bank to determine a suitable BIC or a national bank code, however, specifying the country and place, but in a structured form, will suffice here.

**How many characters can the recipient field comprise for future formats? Will the permitted length of the recipient name change under the new ISO standard?**

Recipient name 140 characters

Complete example:

<Dept>Finance</Dept>, max. 70 characters

<SubDept>Accounting</SubDept>, max. 70 characters

<StrtNm>Gothaer-Straße</StrtNm>, max. 70 characters

<BldgNb>24</BldgNb>, max. 16 characters

<BldgNm>Altes Rathaus</BldgNm>, max. 35 characters

<Flr>2</Flr>, max. 70 characters

<PstBx>12345</PstBx>, max. 16 characters

<Room>02.023</Room>, max. 70 characters

<PstCd>01067</PstCd>, max. 16 characters

<TwnNm>Berlin</TwnNm>, max. 35 characters

<TwnLctnNm>Alter Schlachthof</TwnLctnNm>, max. 35 characters

<DstrctNm> Prenzlauer Berg </DstrctNm>, max. 35 characters

<CtrySubDvsn>Pankow</CtrySubDvsn>, max. 35 characters

<Ctry>DE</Ctry>, two-digit ISO code

<AdrLine></AdrLine>, max. 2 x 70 characters (from 11/2025)



## Glossary

<b>AXZ</b>	EBICS order type for foreign payments in ISO format
<b>AZV</b>	Foreign payment transactions
<b>BIC</b>	Bank Identifier Code, assigned by SWIFT
<b>BTF</b>	Business Transaction Format; in EBICS 3.0, this replaces previous order types, defines the format and the content of the transmitted file
<b>camt</b>	Cash Management (ISO messaging format)
<b>CBPR+</b>	Cross Border Payments and Reporting Plus is a SWIFT working group that defines binding international policies for cross-border payment transactions pursuant to ISO 20022.
<b>CCU</b>	EBICS order type for express transfers denominated in euros in the ISO format
<b>CGI</b>	Common Global Implementation, a SWIFT working group that creates allocation proposals for various formats
<b>DFÜ</b>	Remote data transmission
<b>DK</b>	German Banking Industry
<b>DTAZV</b>	Electronic foreign payments
<b>DTI</b>	Collector for turnover in DTAUS format
<b>EB</b>	Electronic Banking
<b>EBICS</b>	Electronic Banking Internet Communication Standard
<b>ERI</b>	Extended Remittance Information
<b>ERP</b>	Enterprise Resource Planning
<b>GPI</b>	Global Payment Initiative
<b>GVC</b>	Business Transaction Codes
<b>HAC</b>	EBICS order type for use in call-up of transmission logs in pain.002 format
<b>HBCI</b>	Home Banking Computer Interface
<b>IBAN</b>	International Bank Account Number
<b>ISO</b>	International Organization for Standardization
<b>ISO 20022</b>	International standard XML messages used in the finance industry
<b>MT</b>	Message Type (SWIFT messages)

<b>pacs</b>	Payments Clearing & Settlement (ISO messaging format)
<b>pain</b>	Payment Initiation (ISO messaging format)
<b>RFT</b>	Request for Transfer (order format for payments charged against accounts held with third-party banks)
<b>RMA</b>	Relationship Management Application by SWIFT
<b>SCT</b>	SEPA Credit Transfer
<b>SDD</b>	SEPA Direct Debit
<b>SEPA</b>	Single Euro Payment Area
<b>SWIFT</b>	Society for Worldwide Interbank Financial Telecommunication
<b>UETR</b>	Unique End-to-end Transaction Reference
<b>UNIFI</b>	'UNiversal Financial Industry message scheme' is an alternative description for MX or ISO 20022 messages.
<b>VWZ</b>	Intended use
<b>XIC</b>	Commerzbank-specific EBICS order type for payment orders in ISO format
<b>ZV</b>	Payment transactions