



COMMERZBANK



ISO20022

Changes to address formats

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1 Addresses and ISO 20022: What will change from November 2026 onwards?

Completely unstructured addresses will no longer be accepted from November 2026 onwards. You will have to provide semi-structured (hybrid) or fully structured addresses when including addresses in payment orders. Your ERP, electronic banking, and HR systems have to be ready. You will also have to check and adjust your master data in time so as to ensure that information is provided in structured fields. This document will help you understand what needs to be done; it also provides clear practical recommendations to help avoid payments being rejected.

2 About address structures

The address landscape has evolved over time. While the term 'unstructured' played hardly any role in earlier formats such as DTAZV or MT, the modern format introduced a clear definition: using only the AdrLine was categorised as being 'unstructured' – and as being the opposite of a structured approach. Address formats were refined and made more flexible, leading to the concept of hybrid addresses, which integrated and enhanced elements from earlier 'unstructured' approaches.

However, the future belongs to structured addresses. The ISO standard sets out clear guidelines by defining 14 fields.

The most common elements include Country, Town Name, Street Name and Post Code, while elements such as District, Post Box or Room are used less. The mandatory fields – Country and Town Name – are provided in a structured format, while less widespread information is disclosed in separate or general fields such as AdrLine, where required.

2.1 Unstructured addresses

Unstructured addresses are easy to read for humans but more difficult for machines to process and interpret because this format combines various address elements. That can result in false positives during regulatory audits and lead to further queries. Unstructured addresses are still very much in use, especially when placing orders for international payments in the DTAZV format.

```
<Ctr>
<Nm>COMMERZBANK AG</Nm>
<PstlAdr>
  <AdrLine>KAISERPLATZ 1, 49. Stock</AdrLine>
  <AdrLine>DE 60311 Frankfurt</AdrLine>
</PstlAdr>
</Ctr>
```

Figure 1: Example unstructured addresses

2.2 Semi-structured addresses (hybrid)

Semi-structured addresses were introduced to try to make the need for fully structured addresses less onerous, and in order to simplify the migration. The semi-structured option has been available in all XML payment formats since November 2025 and is not only meant to be an interim solution. The hybrid address format combines structured and unstructured address data and requires at least the following structured data:

- Name of the city (Town Name)
- Country code (ISO 2-letter format)

While only Town Name and Country are mandatory elements in the structured part, it is recommended that you add additional structured fields such as the Post Code. The hybrid format allows a maximum of two unstructured address lines (AdrLine, 70 characters max.) that may not duplicate any data from the structured fields.

We recommend using fully structured addresses wherever possible. Unstructured address lines should be used only if data cannot be structured reliably or if the data does not fit into the available structured data fields.

```
<Cdtr>
  <Nm>COMMERZBANK AG</Nm>
  <PstlAdr>
    <TwnNm>FRANKFURT</TwnNm>
    <Ctry>DE</Ctry>
    <AdrLine>KAISERPLATZ 1, 49. Stock</AdrLine>
  </PstlAdr>
</Cdtr>
```

Figure 2: Example semi-structured addresses (hybrid)

2.3 Structured addresses

Each address component in a fully structured address has its dedicated space, as shown clearly in the example below. Structured addresses may not include an unstructured AdrLine field. Town Name and Country are the mandatory fields required for technical validation; however, international payments, for example, generally require a full address.

```
<Cdtr>
  <Nm>COMMERZBANK AG</Nm>
  <PstlAdr>
    <StrtNm>Kaiserplatz</StrtNm>
    <BldgNb>1</BldgNb>
    <Flr>49</Flr>
    <PstCd>60311</PstCd>
    <TwnNm>FRANKFURT</TwnNm>
    <Ctry>DE</Ctry>
  </PstlAdr>
</Cdtr>
```

Figure 3: Example structured addresses

2.4 Levels of detail and background information

But what happens if, for example, the building number is inadvertently provided in the StrtNm field? While it is important that you fill the fields with the correct data, a technical validation would not prevent the payment from being executed in this specific case, i.e. if the building number were provided in the wrong field. What matters is that the information provided in the Country and Town Name elements is correct.

Expert opinions vis-à-vis field specifications, such as a separate building number, vary. The solution that was found allows for maximum flexibility: Country and Town Name must be provided in a structured format, other data can generally be provided in specified fields or in the optional AdrLine field.

The sharp distinction between structured and semi-structured addresses will gradually become less significant over time. The future approach will accept the structured address formats, supplemented by a general 15th field. This flexible AdrLine field will account for individual requirements without compromising on

transparency and efficiency. All in all, this results in a norm that is well equipped to handle the dynamic requirements of modern data structures.

2.5 Why use structured addresses?

ISO 20022 ensures that the data you provide when initiating a payment stays exactly where it belongs: in dedicated, structured fields. This information remains the same – from the point in time the payment is initiated, over payment processing at our Bank and in the clearing systems, up to the preparation of the beneficiary’s account statements – assisting fraud and compliance audits and enabling a high Straight-Through Processing (STP) rate even in times where audit processes have become more demanding. The ISO standard has its origin in the – now largely completed – SWIFT network transition that was launched to simplify international payment flows and which, via the European Payments Council (EPC) and the German Banking Industry Committee (DK), will also be visible in the SEPA formats. Global migration is scheduled for November 2026 and will lead to the following requirements.

3 SEPA and international payments

The requirements related to the address structure show that it is not only banking or ERP software that needs to be updated. Master data accessing your payment-generating systems also has to enable the provision of structured addresses. This requirement applies not only to payer and payee data but also to all other address data provided in a payment (ultimates, intermediary institutions). The diagram below provides an overview of mandatory and optional fields in pain.001.001.09 (DK):

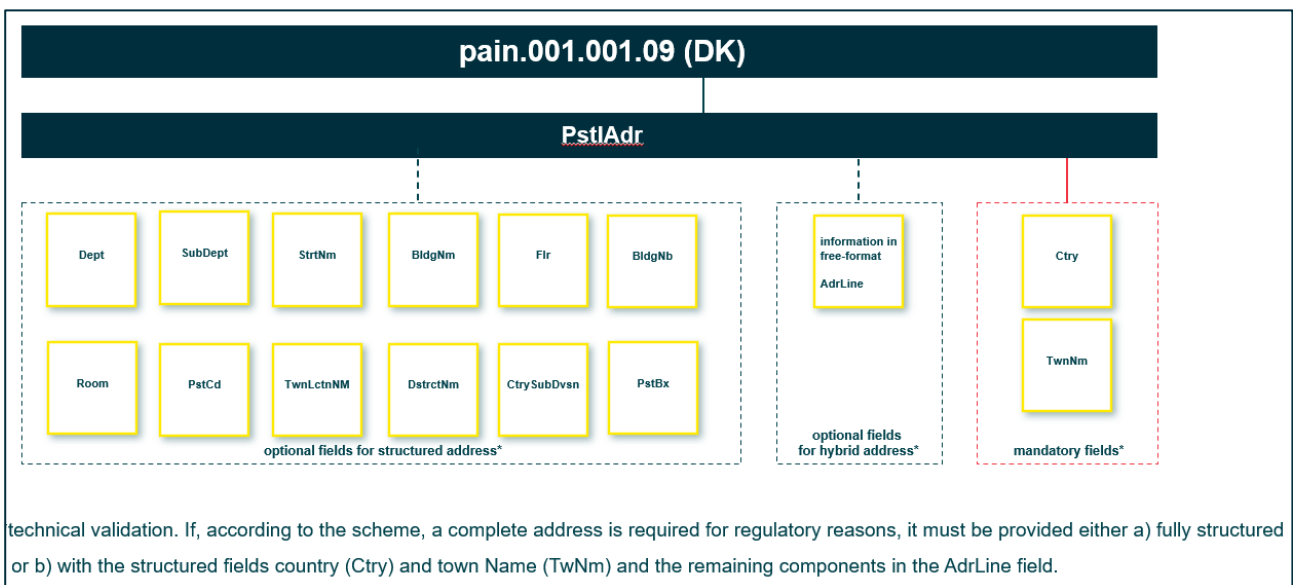


Figure 4: Mandatory and optional fields pain.001.001.09

3.1 Structured addresses in SEPA file formats (DK)

Addresses are optional and normally not required for SEPA payments. The below paragraph describes the exceptions. The likelihood of errors is reduced when unnecessary address information is not added. The payer’s address is structurally enriched by Commerzbank during processing from our master data systems.

Please note that newer payment formats such as pain.001.001.09 (DK) already require structured or semi-structured address data where you choose to provide this information.

3.2 Mandatory address information in SEPA payments outside the EEA

SEPA payments (SEPA Credit Transfers or Direct Debits) to countries outside the European Monetary Union (non-EUR countries) require the address of principal or payer to be provided.

This address must be correct, be complete and contain at least the mandatory fields Country and Town Name in the new formats.

Examples of such transactions include payments to / withdrawals from Great Britain or Switzerland. We will add the principal's address for you in the payment order. Direct Debits, however, must contain the payer's address in a structured or semi-structured format.

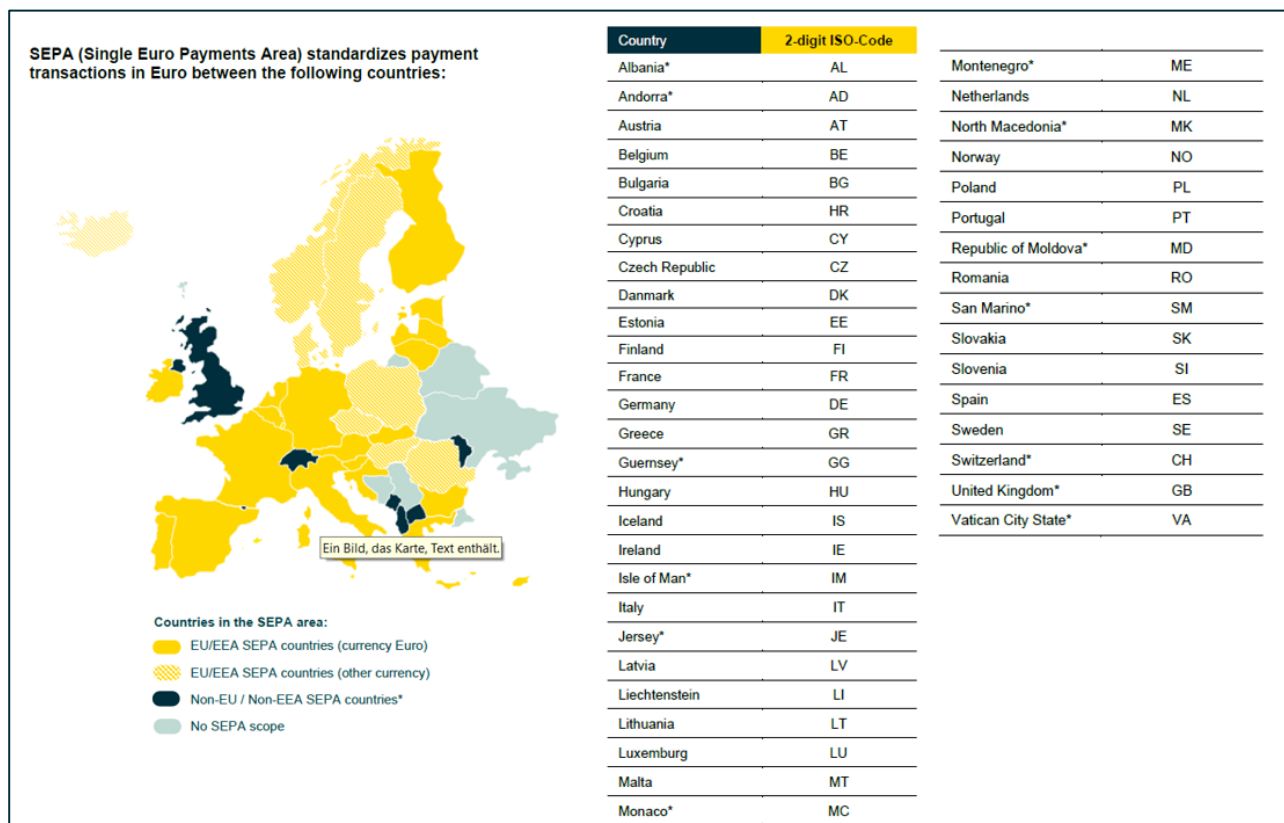


Figure 5: Countries in the European Monetary Union

3.3 Structured addresses in international payments (DK)

Payments that are forwarded outside the SEPA area or the EEA must contain the complete payee and payer address (plus the addresses of all other participants whose addresses must be provided) even though this address is currently not always strictly validated technically.

The rule is: a complete address of the parties involved is required as soon as a payment leaves the EEA.

Transactions 'leave the EEA' if the payee's account is in a target country outside the EEA or if the currency is not the euro. Example: a USD payment from Germany to Austria triggers an international payment because the banks have to involve accounts located in the country of the currency in the payment flow.

Parties involved generally include the payer, the payee and – if disclosed – the ultimate payee and other participants, such as intermediary institutions where indicating the SWIFT code is not possible.

3.3.1 Recipients

The DTAZV format contains only one field for the recipient data. This field is filled with the recipient's address, among other data.

Data in the XML format is divided in a far more granular manner. First, recipient name and address are separated. The next step is separating the address into individual elements, which is probably more challenging.

14 fields enable a granular presentation of all possible address details in individual fields. For most addresses, 5 or 6 elements should be relevant. The two elements Town Name and Country are mandatory. Please ensure that you comply with country-specific requirements.

For example, North American addresses, usually – and in Canada, mandatorily – also comprise the State (field: Country Sub Division). Going forward, you will also be able to indicate the recipient's country separately, where it deviates from the country of the postal address.

Town Name (Pflichtfeld)	<TwnNm>
Country (Pflichtfeld)	<Ctry>
Street Name	<StrtNm>
Building Number	<BldgNb>
Town Location Name	<TwnLctnNm>
District Name	<DstrctNm>
Room	<Room>
Post Code	<PstCd>
Department	<Dept>
Sub Department	<SubDept>
Building Name	<BldgNm>
Floor	<Flr>
Post Box	<PstBx>
Country Sub Division	<CtrySubDvsn>

Figure 6: Datafields of recipient

3.3.2 Recipient banks

It is generally recommended that you obtain the payee's exact foreign bank details. Most recipient banks have a SWIFT/BIC that should be used, rendering additional information unnecessary.

Another option is using national bank codes, in Germany referred to as Bankleitzahl or BLZ. This option is especially recommended if the recipient bank does not have a SWIFT/BIC. The US are the most prominent example: while many banks can be reached via a SWIFT/BIC, a large number only has a Fedwire code.

XML structures stipulate the following setup:

```

<CdrAgt>
  <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>
</CdrAgt>

```

Figure 7: Datafields XML-Structure

In the DTAZV format, field 9b, line 1 'Bank address' would have contained the data '//FW021000021'.

Please note: using a SWIFT/BIC is the best way to go, as it renders additional information unnecessary.

4 Which changes will apply from November 2026 onwards?

Older SEPA/GBIC format versions below version 3.7 will no longer be supported and hence will no longer be accepted. The text-based DTAZV format will be replaced by pain.001.001.09 (AXZ) in DK format versions 3.7 and higher; it will also no longer be accepted. To help your planning, we have drafted the following overview:

LINK: [ISO 20022 – current format versions](#)

Please ensure that you have enough time for format migration and testing. We would be happy to provide you with a format checker. Please note that common format checkers often perform only technical validations, meaning that missing or incorrect addresses may not be highlighted as errors. A corresponding payment order would generally be rejected, which is why we recommend that you perform not only technical validations but also live tests with non-critical payments in advance. At present, we do not believe that the deadlines mentioned will be postponed.

5 Which changes will apply on an international level?

November 2026 marks the time for a global migration event in interbanking – across all major payment methods. Completely unstructured addresses will no longer be accepted from then on. This requirement applies to the contents of the message, not to transport. It is also uncoupled from the input channels used and applies around the globe. Therefore we currently do not believe that the deadlines mentioned will be postponed.

6 Special formats

6.1 Structured addresses in pain.001.001.03 (cgi)

If your payment orders with us are made as pain.001.001.03 based on the CGI format, you can continue to do so for the time being. However, please note that structured or semi-structured addresses are mandatory here too.

We would be happy to provide you with an updated specific characteristics document. Please contact your Cash Management Specialist.

We will also accept pain.001.001.09 (cgi) from 01. August 2026 onwards. Please contact your Cash Management Specialist for the matching specific characteristics document.

6.2 Structured addresses in MT101

If you continue to use MT101 after November 2026, you will also have to structure the address data.

Country (via the country code) and name of the city must be clearly identifiable.

'Option F' introduces a partial structure, using qualifiers (1/, 2/, 3/) in field :50F und :59F:.

Elements in field :50F und 59F:

- 1/ Name
- 2/ Adress (street name and number)
- 3/ Country code / town

Please note that the ample character limit per line is 35; this helps avoid unnecessary abbreviations.

```
:59F:/BE30001216371411  
1/COMMERZBANK AG  
2/KAISERPLATZ 1, 49. Stock  
3/DE/FRANKFURT, 60311
```

Figure 8: Example for a MT101 with field 59F (option F)

We recommend implementing the successor format pain.001.001.09relay as the future successor of MT101, as soon as it is available. Your Cash Management Specialist will be happy to provide more information.

7 Practical recommendations

You should prepare early so as to avoid queries or rejected payment files. A structured approach can help facilitate a smooth transition.

Build a solid basis

- Check your existing payment rails and data formats, including older formats such as MT101 or proprietary files. Don't forget the payment data that is not delivered from other systems (ERP systems), including your HR master data.
- Make sure that your ERP, treasury, and banking systems support the required ISO 20022 formats as well as structured or hybrid address fields by November 2026 at the latest.
- Record the required data in your data records for the following parties by November 2026 at the latest: principal (information from the debtor agent, e.g. from KYC data), payee, ultimate principal/payee (where applicable), other agents involved where there is no BIC.
- Test your end-to-end processes. If possible, conduct low-risk test payments to validate your setup before it goes live. We recommend that you contact your other banking partners early on.
- If you are using MT messages or other logs that are not ISO 20022-compliant: ensure that the name of the city and the country code are also provided in semi-structured fields (please refer to the section on option F for more details).
- Addresses should generally only be provided where actually required. The applicable format descriptions or rules and regulations stipulate whether an address is required or not. However, if you provide an address, it has to be complete and in a structured format.

Consider your payment scenarios

- **Domestic SEPA payments within the EEA (IBAN only):** omitting address data is the simplest and most robust approach for SEPA payments within the EEA. In line with the DK standard, providing this information is optional.
- **SEPA transactions to non-EEA target countries (e.g. Switzerland or the United Kingdom) and scenarios in which payments could actually 'leave' the EEA:** address requirements should be checked very carefully.
- **Cross-border payments / international payments:** regulatory requirements usually stipulate that complete address information is required. Even though Country and Town Name are often the only two technically mandatory elements, incomplete address information frequently results in rejections or delays due to manual follow-ups.
- **Structured and semi-structured address data in MT101 and pain.001.001.03 (cgj):** make sure that address fields are structured correctly even in formats that seemingly continue to be usable.

Important:

Your payment files may be rejected if you do not use structured or semi-structured addresses, or if you use old payment formats.

Payment method	As of November 2026	
Credit transfers in the formats permitted by the German Banking Industry Committee (DK)*	Structured/semi-structured	Unstructured
SEPA within the EEA	Optional	No longer possible
SEPA outside the EEA	Optional	No longer possible
International payments outside the SEPA area	Mandatory	No longer possible
SEPA Direct Debits in the formats permitted by the German Banking Industry Committee (DK)*	Structured/semi-structured	Unstructured
Within the EEA	Optional	No longer possible
Outside the EEA	Mandatory	No longer possible
Special payment formats	Structured/semi-structured	Unstructured
pain.001.001.09 (cgi)	Mandatory	No longer possible
pain.001.001.03 (cgi)	Mandatory	No longer possible
MT101	Mandatory (Option F)	No longer possible

Figure 9: Overview payment formats

*Please refer to our ISO 20022 landing page to obtain a full overview of the formats valid from 2026 onwards and to see which formats Commerzbank AG, Germany will accept.

Our ISO 20022 landing page provides further information: besides a new document providing detailed information regarding address data, you will find further information to facilitate your migration process.



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