

Swiss Payment Standards: Changes planned for November 2025 Document: Adjustments to the Implementation Guidelines for Credit Transfer

Period for submitting feedback on the planned changes: 5.11.2024 to 25.11.2024

Company / Organisation				
Contact person				
Address				
Telephone				
E-mail				
Category	☐ Financial intermediary ☐ Other, please specify:		☐ Software part	ner
Number of employees	□ 1-10	□ 11-50	□ 51-200	
Number of customers concerned	□<50	□ 51-1,000	☐ 1001 <b>-</b> 10,000	☐ >10,000
Place, date	,			

#### Important information:

- Please send your comments by e-mail to <u>consultations@paymentstandards.ch</u> by 25.11.2024 24:00
- The sections of this form correspond to the respective chapters in the change document. Only those chapters that contain changes and for which we expect feedback are listed. If you have any further comments, please use the section at the end of this form.
- SIX Interbank Clearing Ltd reserves the right to accept only duly completed forms.
- By submitting the change request, you give your consent to it being published in full or in part.
- By submitting the change request, you agree to the SIX Privacy Statement.

#### **General remarks**



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Submitted by

☐ *Do not* agree

#### Details of the changes are available in the following document:

"Swiss Payment Standards – High-level information about planned changes in SPS 2025" at <a href="https://www.iso-payments.ch">www.iso-payments.ch</a>.

### 2.1 Adjustment to "Use of address information" (Chapter 3.11)

☐ Agree	☐ Change is relevant to us	☐ Change is urgent

☐ Change is *not* relevant to us

**Reason** (must be completed if you do *not* agree):

Your opinion on this planned change:

GLEIF is pleased to provide comments to SIC Ltd.'s planned adjustments to Implementation Guidelines Credit Transfers SPS 2025. GLEIF would like to focus its comments on the adjustments to "Use of address information" (Chapter 3.11). In particular, GLEIF would like to suggest the inclusion of the LEI as a data element in the payment message within the Swiss Payment Standards (SPS).

☐ Change is *not* urgent

When the LEI is added as a data attribute in payment messages, all parties involved in the transaction, such as the creditor, can be precisely, instantly, and automatically identified across borders. The inclusion of the LEI removes the friction of name matching in confirmation of the creditor (see PMPG Global adoption of the LEI in ISO 20022 Payment Messages version 2, Use Case 5 – Account-to-account owner validation). It removes the complexity of attempting to structure address information consistently across organizations by providing a single globally consistent starting point for address information. For example, while debtor address information can be sourced from the debtor agent's KYC master records, the debtor interpretation of the creditor address into the ISO 20022 format is recognized as being 'problematic', PMPG Structured ordering and beneficiary customer data in payments.

Each <u>LEI</u> record displays the entity's legal name and legal address information in the entity's local language character set and often with transliteration or translation. There are more than 200 <u>regulations worldwide</u> referencing the LEI. The LEI is recognized in the CPMI's '<u>Harmonized ISO 20022 data requirements for enhancing cross-border payments</u>'. This publication suggests the LEI may substitute name and postal address for legal entities involved in cross-border payments. Another example is the Bank of England implementation of the LEI for CHAPS Direct Participants – which include traditional high-street banks and a number of international and custody banks (see Bank of England <u>Policy Statement: Implementing ISO 20022 Enhanced data in CHAPS</u>).

GLEIF wishes to reiterate that the widest possible use of interoperable, standardized global identifiers, like the LEI, in cross-border payments can significantly increase efficiency and reliability in the identification of the name and location of the parties involved in the transaction. Therefore, GLEIF recommends that SIC Ltd. considers all the developments and makes the necessary adjustments to the SPS, including identifiers already being used by businesses for identity verification purposes globally, such as the LEI. This approach will ensure that the SPS align with international standards and



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recommendations set by organizations, such as the FATF, BIS CPMI, Wolfsberg Group, FSB.

	osal to further discuss and support the SIC Ltd. related to the LEI in the current and future cor	
2.2 Adjustment to	" XML schema validation" (Chap	ter 3.6)
Your opinion on this plan	ned change:	
☐ Agree	☐ Change is relevant to us	☐ Change is urgent
☐ <i>Do not</i> agree	☐ Change is <i>not</i> relevant to us	☐ Change is <i>not</i> urgent
<b>Reason</b> (must be comple	ted if you do <i>not</i> agree):	
2.3 Adjustment to	" Character set for reference ele	ments" (Chapter 3.2)
Your opinion on this plan	ned change:	
☐ Agree	☐ Change is relevant to us	☐ Change is urgent
☐ <i>Do not</i> agree	☐ Change is <i>not</i> relevant to us	☐ Change is <i>not</i> urgent
<b>Reason</b> (must be comple	ted if you do <i>not</i> agree):	
Period for submitting feed	back on the planned changes: 5.11.2024	to 25.11.2024
Submitted by		
•	are available in the following docum ds – High-level information about plan	
2.4.1 Adjustments to	"Name" to 140 characters	
Your opinion on these pla	anned changes:	
☐ Agree	☐ Changes are relevant to us	☐ Changes are urgent



•	lards: Changes planned for lents to the Implementation (	November 2025 Guidelines for Credit Transfe
☐ <i>Do not</i> agree	☐ Changes are <i>not</i> relevant to us	☐ Changes are <i>not</i> urgent
Reason (must be complete	d if you do <i>not</i> agree):	
Further comments		
Your opinion on these plan	ned changes:	
☐ Agree	☐ Changes are relevant to us	☐ Changes are urgent
☐ <i>Do not</i> agree	☐ Changes are <i>not</i> relevant to us	☐ Changes are <i>not</i> urgent
<b>Reason</b> (must be complete	d if you do <i>not</i> agree):	