



Bank Polski

Rules of payment orders executed by
Payment Service Providers „on behalf of”
and “for” third parties or entities effective
from January 1, 2024.

The following document is based on standards developed by a group consisting of representatives of banks, Krajowej Izby Rozliczeniowej S.A., Polskiej Organizacji Niebankowych Instytucji Płatności and Związku Banków Polskich, as a result of cross-sectoral agreements.

Clarification of abbreviations

payer	Natural person, legal person and organisational unit that is not a legal person and to which the Payment Services Law confers legal capacity, submitting a payment order;
payee	Natural person, legal person and organisational unit that is not a legal person and to which the Payment Services Law confers legal capacity, being a beneficiary of funds that are the subject of a payment transaction;
regulation	Regulation (EU) 2015/847 of the European Parliament and of the Council of 20 May 2015 on information accompanying funds transfers and repealing Regulation (EC) No. 1781/2006 - further the "regulation";
law	Law of March 1, 2018 on the prevention of money laundering and financing of terrorism - hereinafter the "law";
rules	RULES ON BANK ACCOUNTS FOR CORPORATE MARKET CLIENTS AT PKO BANK POLSKI SA;
agreement	Agreement on the transfer of instructions between the Providers providing the service of initiating payment orders and PKO Bank Polski SA;
PSP or providers	(non-bank Payment Service Provider) Providers initiating payment orders by ordering the execution of Payment Orders on behalf of and for third parties or entities.
OPF	(Payment Organization (From:)) The original payer is not the same as the holder of the bank account debited with the amount of the transfer. This is an outgoing transaction performed on behalf of third parties or entities.
OPT	(Payment Organization (To:)) The ultimate payee is not same as the holder of the bank account credited with the amount of the transfer. It is an incoming transaction received for third parties or entities.
POBO	(Payments on Behalf of) Outgoing Payment orders initiated on behalf of third parties or entities, to which information on the original payer should accompany the transfer of funds.
POBO - X	(Payments on Behalf of - Exception) Outgoing payment orders initiated on behalf of third parties or entities, which information about the third parties or entities does not accompany the transfer of funds because it is subject to exemptions in the regulation or the law . This also applies to liquidity management outflows in respect of third parties funds.
COBO	(Collections on Behalf of) Incoming payments to third parties or entities for which information on the ultimate payee should accompany the transfer of funds.
COBO-X	(Collections on Behalf of - Exception) Incoming payments for third parties or entities which information about the third parties or entities does not accompany the transfer of funds because it is subject to exemptions described in the regulation or the law . This also applies to liquidity management inflow in respect to third parties funds.
X	(eXception) We do not provide payer's data - due to exceptions described in the regulation or the law .
A	(Account) The transaction is made from the payment account (the nearest slash is followed by the number of the account).
I	(Identification number (ID)) The transaction is not executed from the payment account/payment account held by the PSP for the original payer/ultimate payee - the identifier of this transaction (transaction ID) is indicated after the nearest slash.
EOG	European Economic Area;
U	(UE (more precisely: EOG)) Each PSP provider is based in the EEA, so the details of the original payer/ultimate payee are abbreviated. After the nearest slash, only the payment account number/identifier of this transaction (transaction ID) is provided.
N	(NonUE (more precisely: non-EOG)) At least one PSP is located outside the EEA, therefore the data of the original payer/final payee is extended. After the nearest slash is the payment account number/identifier of this transaction (transaction ID). After yet another slash is the name/name of this original payer/final payee. For POBO: <ul style="list-style-type: none"> • If the transaction exceeds EUR 1,000 - the next slash is followed by a marker for the type of additional payer information. After yet another slash, you enter these details (as indicated under the table in the section for POBO) • - If the transaction does not exceed EUR 1,000 - you can enter these additional details, but it is not obligatory

In accordance with the **regulation, law, rules and agreement**, providers (PSP), when executing payment orders on behalf of and for third parties or entities, are required from 1 January 2024 to provide additional data in the transaction details:

- the **payer's and payee's** bank account number or unique transaction identifier
- the name or full name of the **payer and payee**
- in the case of a **payer**, the full address or official identification number
- where the **payer** is a natural person, the date and place of birth or number of the identity document may be used instead of the address

apart from the exceptions described in the **regulation** or the **law**.

Payment orders „on behalf of” third parties or entities

These are outgoing payment orders in which the original payer is not the holder of the bank account being debited with the amount of the transfer, but a third party or entity on whose behalf the provider is executing the transfer.

There are 2 types of outgoing transfers to third parties or entities:

- **POBO** (Payments on Behalf of)
- **POBO-X** (Payments on Behalf of - Exception)

When ordering such a transaction (i.e.: internal transfers, Elixir, Express Elixir, SORBNET), provide the required data in the payment details (payment title) field according to the table below:

		Type of transfer		
Is the transfer from a payment account?	POBO-X (exception)	POBO		
		When all PSPs are based in the EEA	When not all PSPs can be based in the EEA (<1000 EUR)	When not all PSPs can be based in the EEA (≥1000 EUR)*
YES (account1234)	/OPF/X/////	/OPF/AU/1234/////	/OPF/AN/1234/Jan Nowak///	/OPF/AN/1234/Jan Nowak/1/ul. Nowa 1, Warszawa.PL/
NO (transaction ID 9876)		/OPF/IU/9876/////	/OPF/IN/9876/Jan Nowak///	/OPF/IN/9876/Jan Nowak/1/ul. Nowa 1, Warszawa.PL/

* There are 4 types of information required:

- the payer's address, ending with a period and a two-character ISO3166-1 alpha-2 type country code (preceded by /1/);
- official identity document number (preceded by /2/);
- official payer identification number (preceded by /3/);
- date and place of birth (preceded by /4/).

Select one of the above required information and put it in the field "Payment details".

After the required description of the payment title, you can enter additional information about the transfer (free text).

There are always 7 system slashes in the structure of the "Payment details" (payment title).

You can enter additional information (free text) after the seventh slash, there you no longer enter another slash.

If you order a transaction by SWIFT message using the SORBNET or ELIXIR system, the payer information is already structured in the SWIFT message (field 50 of the MT103 message) and will be passed on by us. In this situation, you do not need to complete the payment details with this data again. In addition, we recommend that field 70 of the MT103 message starts with:

- /OPF/A/ - if the transaction is from a payment account
- /OPF/I/ - in other cases, where the transaction identifier (transaction ID) is given

Payment orders „for” the third parties or entities

These are incoming payment orders in which the ultimate payee of the transfer is not the holder of the bank account credited with the amount of the transfer, but the third party or entity on whose behalf the provider accepts the transfer.

There are 2 types of incoming transfers to third parties or entities:

- **COBO** (Collections on Behalf of)
- **COBO-X** (Collections on Behalf of - Exception)

When ordering such a transaction (i.e.: internal transfers, Elixir, Express Elixir, SORBNET), provide the required data in the payment details (payment title) field according to the table below:

		Type of transfer		
Is the transfer to a payment account?	COBO-X (exception)	COBO		
		When all PSPs are based in the EEA	When not all PSPs can be based in the EEA (<1000 EUR)	When not all PSPs can be based in EEA (≥1000 EUR)
YES, (account1234)	/OPT/X/////	/OPT/AU/1234/////	/OPT/AN/1234/Jan Nowak///	
NO (transaction ID 9876)		/OPT/IU/9876/////	/OPT/IN/9876/Jan Nowak///	

You can use the option of Virtual Account numbers, which are the corresponding payment account number of the payee/ID of the transaction. In situations where not all PSPs may be based in the EEA, additional information is required.

After the required description of the payment title, you can provide additional information about the transfer (free text).

There are always 7 system slashes in the structure of the "payment details" (payment title).

You can enter additional information (free text) after the seventh slash, there you do not enter another slash.