Rules on Payments and Collections

Executed by Payment Service Providers and Their Agents on behalf of Third Parties applicable from 1 January 2024

Contents

Terms and definitions 3
1. POBO 4
2. COBO 6
3. POBO – COBO 7
4. Key to tags used in the tables from items 1 and 2 8

Terms and definitions

1. PSP (non-bank Payment Service Provider)	payment service providers and their agents.
2. Integrated Bank Account Agreement Regulations	Regulations on Opening, Holding and Closing an Integrated Bank Account at mBank S.A.
3. Regulation	Regulation (EU) 2015/847 of the European Parliament and of the Council of 20 May 2015 on information accompanying transfers of funds and repealing Regulation (EC) No 1781/2006.
4. Act	the Act of 1 March 2018 on Combating Money Laundering and Terrorism Financing.
5. Payment on behalf of a third party	a payment order whereby the bank account debited with the transfer amount is not owned by the ultimate debtor, but instead by a third party on whose behalf a PSP executes the payment order ("payments-on-behalf"). Types of payments-on-behalf: — **POBO** (Payments on Behalf of) – a payment order whereby the information on the ultimate debtor is included in the reference field of the transfer, — **POBO-X** (Payments on Behalf of – Exception) – a payment order whereby the information on the ultimate debtor is not included in the reference field of the transfer because the ultimate debtor is covered by exclusions specified in the Regulation or the Act or because the payment order is connected with liquidity management of a third party's funds.
6. Collection on behalf of a third party	a payment order whereby the bank account credited with a transfer is not owned by the ultimate creditor, but instead by a third party on whose behalf a PSP accepts the payment order ("collection-on-behalf"). Types of collections-on-behalf: — **COBO** (Collections on Behalf of) – a payment order whereby information on the ultimate creditor should be included in the reference field of a transfer, — **COBO-X** (Collections on Behalf of – Exception) – a payment order whereby information on the ultimate creditor is not included in the reference field of a transfer because the ultimate creditor is covered by exclusions specified in the Regulation or the Act or because the payment order is connected with liquidity management of a third party's funds.

7.	**POBO-COBO**	outgoing payments and collections executed on behalf of a third party.

PSPs, pursuant to:

1. the Regulation,
2. the Act,
3. the Integrated Bank Account Agreement Regulations,

when executing payments-on-behalf and collections-on-behalf, will be obliged to provide the following details from 1 January 2024:

1) account number of the debtor and the creditor, or the unique transaction identifier,
2) first name and surname / business name of the debtor and the creditor,
3) additionally for the debtor: address and official identification number; if the debtor is a natural person, their address can be substituted by their date and place of birth or the number of their official identity document,

subject to exclusions specified in the Regulation and the Act.

1. POBO

Domestic transfers:

When ordering such a transfer (i.e. internal transfer, Elixir, Express Elixir, SORBNET), provide the mandatory data in the “Payment details” (“Reference”) field as per the table below.

FX transfers:

When ordering such a transfer (i.e. internal transfer, SWIFT, TARGET), provide the mandatory data in the “Payment details” (“Reference”) field as per the table below. When ordering a SEPA credit transfer, you can use the dedicated “Ultimate debtor” field. If you are unable to fill in this field in the SEPA message, provide the mandatory data in the “Payment details” (“Reference”) field as per the table below.

Type of payments-on-behalf* debited to a PSP's account with the bank:

Does the PSP maintain a payment account for the ultimate debtor?	POBO-X	POBO		
		if all PSPs are based in the EEA	if any of the PSPs is not based in the EEA (< EUR 1,000)	if any of the PSPs is not based in the EEA (≥ EUR 1,000)**
YES, it does (payment account no. 5678)	/OPF/X/////	/OPF/AU/5678////	/OPF/AN/5678/ Jan Nowak///	/OPF/AN/5678/ Jan Nowak/1/ ul. Nowa 1, Warszawa.PL/
NO, it does not (unique transaction identifier 9876)		/OPF/IU/9876////	/OPF/IN/9876/ Jan Nowak///	/OPF/IN/9876/ Jan Nowak/1/ ul. Nowa 1, Warszawa.PL/

* key to tags is presented in the table in item 4

** there are four types of mandatory information:

1. debtor's address, ended with a period and a two-letter ISO 3166-1 alpha-2 country code (preceded with /1/);
2. number of the official identity document (preceded with /2/);
3. debtor's official identification number (preceded with /3/);
4. date and place of birth (preceded with /4/).

Choose one of the above types of information and fill in the field.
After entering the mandatory information, additional information may be added in the form of free text.
The above structure always contains seven slashes. Additional information (free text) can be entered after the seventh slash.

Note! No additional slashes should be used when providing additional information.

2. COBO

Domestic transfers:
When ordering such a transfer (i.e. an internal transfer, Elixir, Express Elixir, SORBNET), provide the mandatory data in the “Payment details” (“Reference”) field as per the table below.

FX transfers:
When ordering such a transfer (i.e. an internal transfer, SWIFT, TARGET), provide the mandatory data in the “Payment details” (“Reference”) field as per the table below. When ordering a SEPA credit transfer, you can use the dedicated “Ultimate creditor” field. If you are unable to fill in this field in the SEPA message, provide the mandatory data in the “Payment details” (“Reference”) field as per the table below.

Type of collections-on-behalf* credited to a PSP’s account with the bank:

Does the PSP maintain a payment account for the ultimate creditor?	COBO-X	COBO		
		if all PSPs are based in the EEA	if any of the PSPs is not based in the EEA (< EUR 1,000)	if any of the PSPs is not based in the EEA (≥ EUR 1,000)
YES, it does (payment account no. 5678)	/OPT/X/////	/OPT/AU/5678////	/OPT/AN/5678/Jan Nowak///	
NO, it does not (unique transaction identifier 9876)		/OPT/IU/9876////	/OPT/IN/9876/Jan Nowak///	

* key to tags is presented in the table in item 4

After entering the mandatory information, additional information may be added in the form of free text. The above structure always contains seven slashes. Additional information (free text) can be entered after the seventh slash.

Note! No additional slashes should be used when providing additional information.

3. POBO – COBO

In the case of POBO–COBO, information on the ultimate debtor and ultimate creditor must be provided in line with the item and table regarding payments-on-behalf (POBO/POBO-X) and in line with the item and table regarding collections-on-behalf (COBO/COBO-X).

Details of the ultimate debtor (POBO/POBO-X) entered in the “Payment details” field should be separated with one space from the details of the ultimate creditor (COBO/COBO-X). After entering the mandatory information, additional information may be added in the form of free text.

The above structure always contains fourteen slashes. Additional information (free text) can be entered after the fourteenth slash.

Note! No additional slashes should be used when providing additional information.

4. Key to tags used in the tables from items 1 and 2

Tag	Description	Meaning
OPF	The ultimate debtor is not the owner of the bank account debited with the transfer amount. It is a “payment-on-behalf” transaction, i.e. a transfer ordered by a different entity/person than the owner of the account debited with the transfer.	Organizacja Płatnicza [payment organisation] (From:)
OPT	The ultimate creditor is not the owner of the bank account credited with the transfer amount. It is a “collection-on-behalf” transaction, i.e. a transfer collected on behalf of a different entity/person than the owner of the account credited with the transfer.	Organizacja Płatnicza [payment organisation] (To:)
X	The debtor’s details do not have to be provided (as the transfer is covered by an exclusion)	eXception
A	The transfer is debited/credited to a payment account maintained by a PSP for the ultimate debtor/creditor. This tag is followed immediately by a slash and then the account number in question.	Account
I	The transfer is not debited/credited to a payment account maintained by a PSP for the ultimate debtor/creditor. This tag is followed immediately by a slash and then the unique transaction identifier.	Identification number (ID)
U	Every PSP is based in the EEA, therefore only selected ultimate debtor/ creditor details must be entered. This tag is followed immediately by a slash and then only by the payment account number / unique transfer identifier (transfer ID).	Unijne [Union] / UE [EU] (specifically the EEA)
N	At least one PSP is based outside the EEA, therefore full ultimate debtor/ creditor details must be entered. This tag is followed immediately by a slash and then by the number of the payment account / unique transaction identifier (transaction ID) and, after the next slash, the first name and surname / business name of the ultimate debtor/creditor.	Nieunijne [non-Union] / Non-UE [non-EU] (specifically non-EEA)
	For POBO: if the threshold of EUR 1,000 has been exceeded, the next slash is followed immediately by the tag designating which details of the ultimate debtor are mandatory. The next slash is followed immediately by the details of the ultimate debtor in line with the information presented under the table in the part regarding POBO. If the threshold of EUR 1,000 has not been exceeded, the provision of these details is optional.	