



DESCRIPTION OF ADDITIONAL OPTIONAL SERVICE 1 (AOS1) APPLIED IN FINLAND TO SEPA CREDIT TRANSFER

1 AOS 1: Payment date (Acceptance date)

1.1 Business justification, definitions and process

A payment date (below referred to as Acceptance date) is information for the Beneficiary that enables the calculation of late payment interest. Late payment interest is calculated by the Beneficiary. Interest is calculated for the period from the due date to the Payment date (Acceptance date).

According to Finnish practice, a payment is considered to be paid in due time if the payer has initiated the payment and the payer's bank has debited the payer's account irrevocably on the due date. Accordingly, late payment interest is calculated on the basis the Payment date (Acceptance date) in Finland. The Payment date (Acceptance date) is also referred to in the Tax Statutory Order.

The Payment date (Acceptance date) is defined to be the date on which a credit transfer is debited to the payer's account irrespective of whether this takes place after the cut off time or during a weekend (the book date in the bank's accounting may differ from the value date, which is often the next banking day).

According to the definition by the ISO 20022 XML standard the Acceptance date is: "Point in time when the payment order from the initiating party meets the processing conditions of the account servicing agent (debtor's agent in the case of a credit transfer, creditor's agent in the case of a direct debit). This means - amongst others - that the account servicing agent has received the payment order and made the necessary checks regarding e.g. authorisation and availability of funds."

Accordingly, the payment date referred to above can be considered the Acceptance date defined by the ISO 20022 XML standard.

As the acceptance date is only meaningful at a day level, there is no use for the time element.

During a credit transfer initiation the originator's bank sets the acceptance date to the interbank payment message. The beneficiary's bank forwards the date to the beneficiary as part of the transaction information.

It is the originator's bank responsibility to inform the originator that the Acceptance date is not part of the basic scheme and thus not forwarded to each beneficiary.



2. Related definitions

The Payment Services Directive (PSD) defines the Point in Time of Receipt as the time when the payment order is received by the payer's bank. The payer's bank may establish a cut-off time beyond which a payment order received will be deemed to have been received on the next business day. This is meaningful during night and weekends when the Acceptance date and Point in Time of Receipt differ. The point in time of receipt is defined for the purpose of Article 64 of the PSD (the execution time).

The SEPA Credit Transfer Rulebook (version 2.3) defines Acceptance date as follows:

"The Acceptance Date is defined by the Originator Bank and is communicated to its Originator. The Acceptance Date is the beginning of the Execution Time-cycle. The Acceptance Date is the date of fulfillment of all conditions required by the Originator Bank as to the execution of a SEPA Credit Transfer including but not limited to regulatory obligations, to cut off times defined by the Originator Bank and to the availability of adequate financial cover and of the information required to execute the instruction."

Compared to PSD one could argue that the Acceptance Date in the Rulebook should rather be called Point in Time of Receipt. The acceptance date as defined and used for this AOS purpose shall not be considered as the beginning of the execution cycle.

3. Description of the AOS

The Acceptance Date will be included according to the implementation guide for UNIFI (ISO 20022) XML*) in the interbank credit transfer message and to be forwarded to the beneficiary as part of the bank to customer credit transfer information. The time of the data element will be the actual time or 00:00.

*) 2.19 AcceptanceDateTime <AcctncDtTm>

4. Adherence to the AOS

According to the instructions to be provided by SEEBACH Community.

5. For non-AOS Participant

The data element will not be forwarded to non-AOS Participants



6. Change request for the SEPA Credit Transfer Rulebook

As it will continue to be necessary from the business point of view to forward the Acceptance Date in the interbank space, it should be considered to be included in the SEPA Credit Transfer Rulebook as an optional field. The current term Acceptance Date in the Rulebook should be changed according to Payment Services Directive to the Point in Time of Receipt.