UNITED ARAB EMIRATES
MINISTRY OF FINANCE

الإمارات العربية المتحدة
وزارة المالية

FATCA / CRS System – User Guide

Version 2.1

Date: 17 April 2024

Ministry of Finance – FATCA / CRS System

This document contains 62 pages

– STRICTLY CONFIDENTIAL –

DOCUMENT CONTROL

Date	Author	Version	Change Reference
06 June 2023	Ministry of Finance	v0	Registration and Data Submission
25 June 2023	Ministry of Finance	v1	Risk Assessment
17 April 2024	Ministry of Finance	v2.1	Corrections and Registration enhancements

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1 FATCA / CRS System Registration

1.1 Login and creating Groups

UAE Ministry of Finance FATCA/CRS system registration process

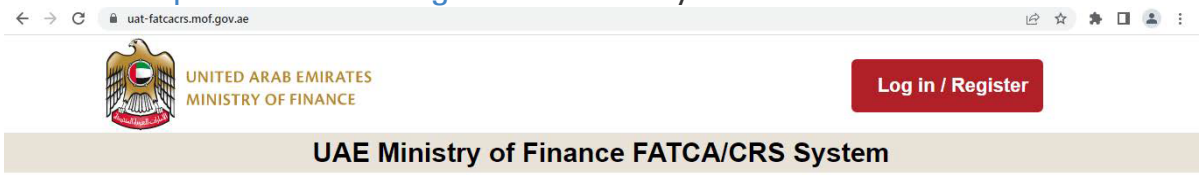
The UAE Ministry of Finance FATCA/CRS system website is available at https://fatcacrs.mof.gov.ae
Login to FATCA CRS system is only possible using UAEPASS.

Users can sign up to UAEPASS as a **Citizen / Resident** or **Visitor**. It is possible to install UAE PASS as a visitor outside UAE as well by providing your mobile number. (It need not be a UAE phone number).

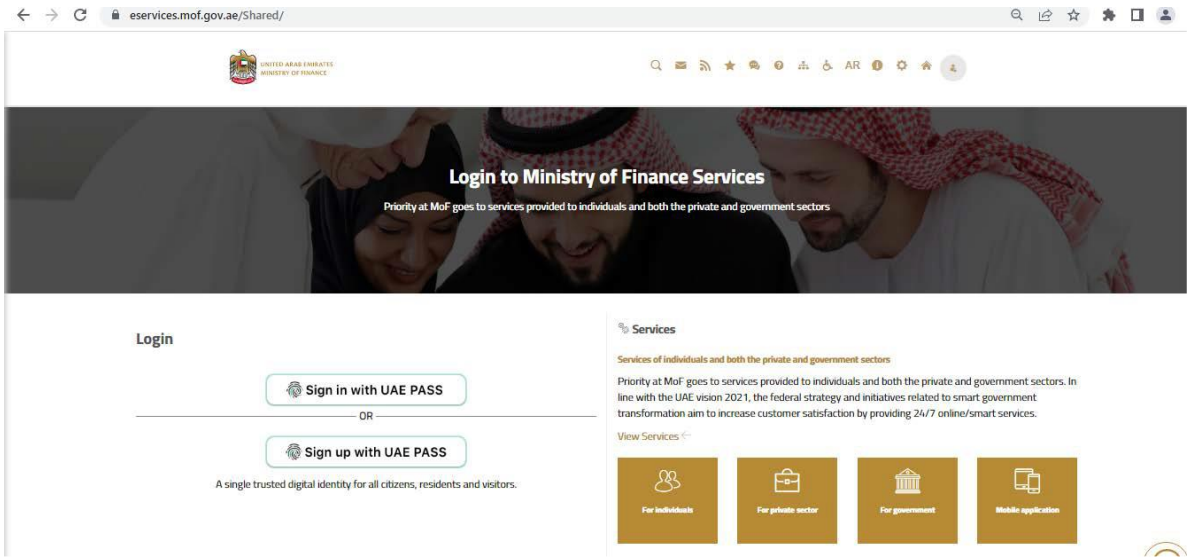
UAEPASS account is linked to personal phone number and email address. The FATCA CRS system allows users to define a "correspondence email", so that FATCA / CRS emails can be sent to your work / professional email address, rather than your personal email address.

For questions and enquiries, kindly contact 800533336 or email info@mof.gov.ae
For assistance with UAE Pass - please visit https://icp.gov.ae/en/uae-pass/

The link https://fatcacrs.mof.gov.ae will take you to the main screen



Click the Register button in order to register for the first time. If you have registered previously, please press Login and you will be taken to the UAE PASS login.

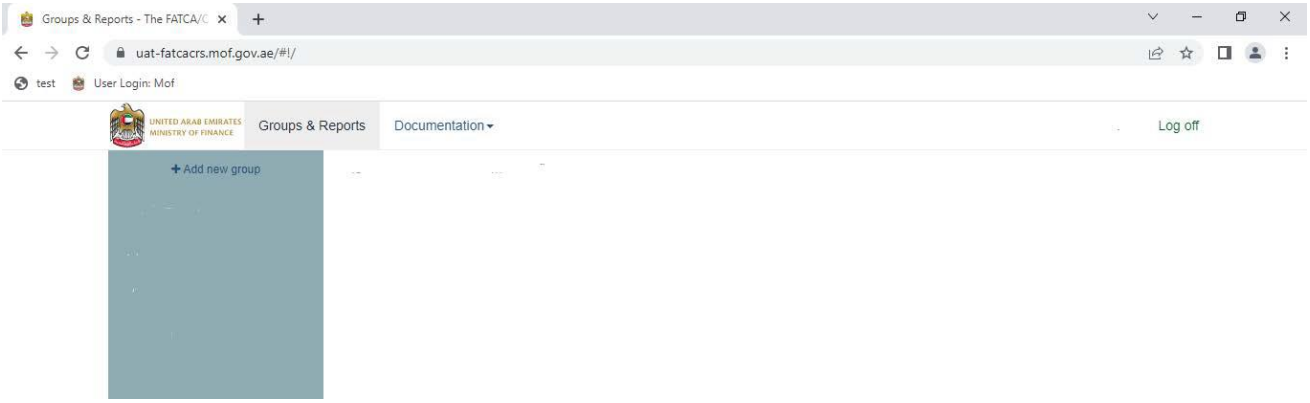


1. Register as a user of the system

Register and login using UAE Pass.

2. Log in

Once you have successfully registered and logged in you will be presented with the UAE
Ministry of Finance FATCA/CRS system Main Page.



Groups

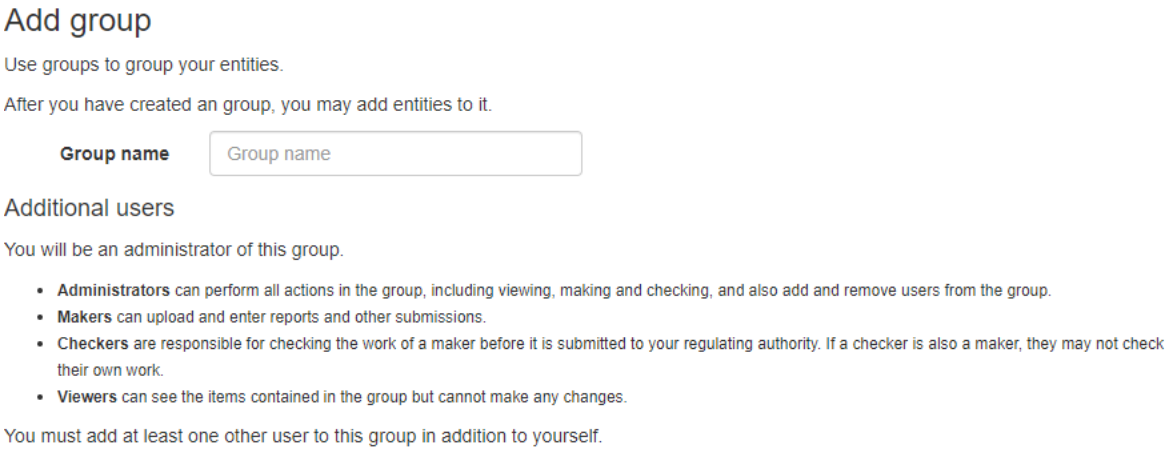
The system uses Groups to group Financial institutions (FIs) together. This is to assist you with the administration of the system. All FIs with the group will have the same administrators, makers and checkers.
You are welcome to set up separate groups if you wish.
A group can contain Financial Institutions which are regulated by different Regulatory Authorities, however, if a single Financial Institution is regulated by more than one Regulatory Authority, then a separate group needs to be set up for the Financial Institution for each Regulatory Authority. You cannot have an FI multiple times in the same group.

Example:
If the FI is regulated by both Central Bank and SCA, then 2 groups need to be set up and
the FI registered in each group.

3. Add a Group

Groups are used to group reporting entities.

- A Group is a group of one or more Financial Institutions.

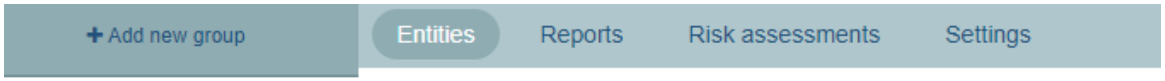


To create a Group, give it a name. Any name that describes the group.
To create additional Groups, click on **+Add new group**

1.2 Managing Groups

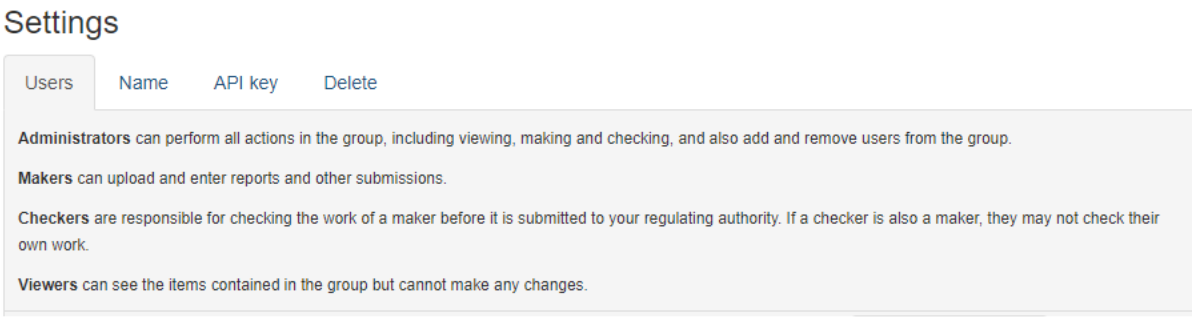
Settings

When you select an Group you have set up, you will see the following menu bar.

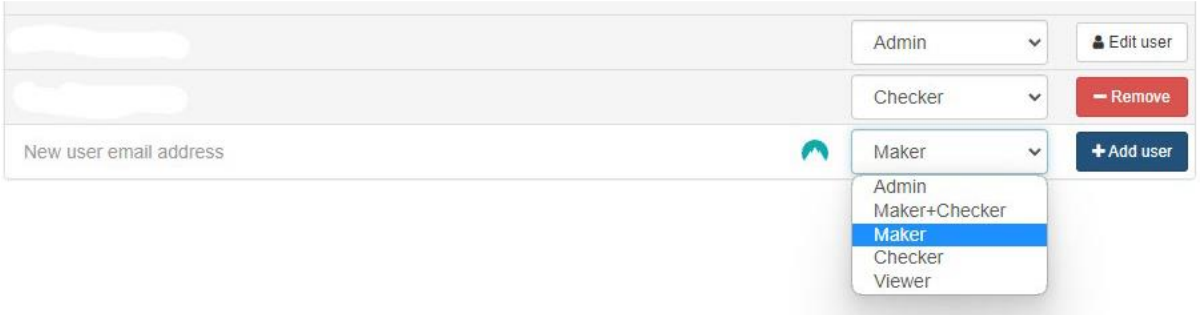


Under **Settings**, you will find a number of options.

Users



The Users tab allows you to add and manage users. Users can be added and removed together with their role, however, at least one Admin user must remain.



To add a new user:

- Enter the new users email address, and press **+Add user**.

If the new user is already registered with UAE Ministry of Finance FATCA/CRS system, they will be granted access to the organization immediately and notified by email.

If the new user is not already registered with UAE Ministry of Finance FATCA/CRS system, they will be sent an email with a link to click to confirm their email address. They will be granted access to the organization once they have confirmed their email address.

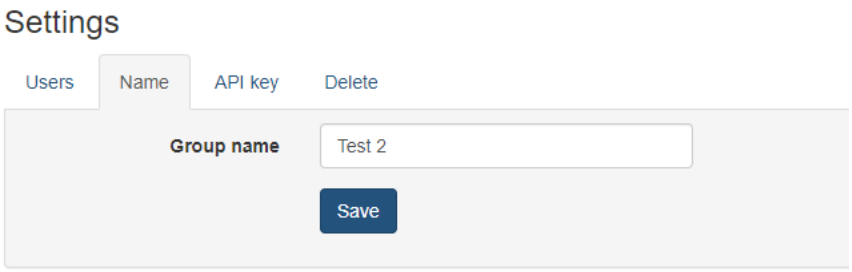
To remove a user:

- Press the **-Remove user** button next to the email address of the user you wish to remove.
- Press the red **Remove** button to confirm.

All users can see the names of the other users within their group and their roles for transparency, but only the Admin can change the roles.

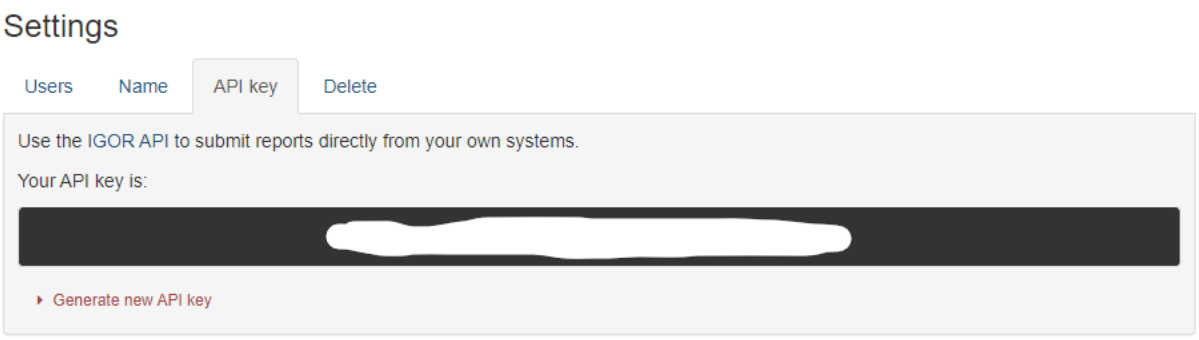
Name

The Name tab allows you to change the information about the Group.



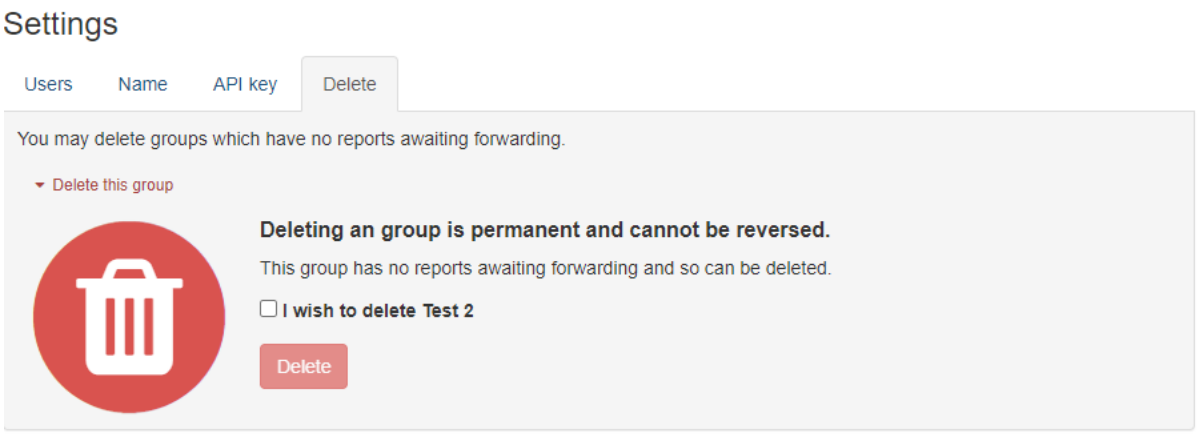
API Key

Under **API** tab your will find the API key for your Organization. This is only relevant if you plan to automate the transmission of your returns in XML format using the API. For report submission using the API, all financial institutions within a Group share the same API key.

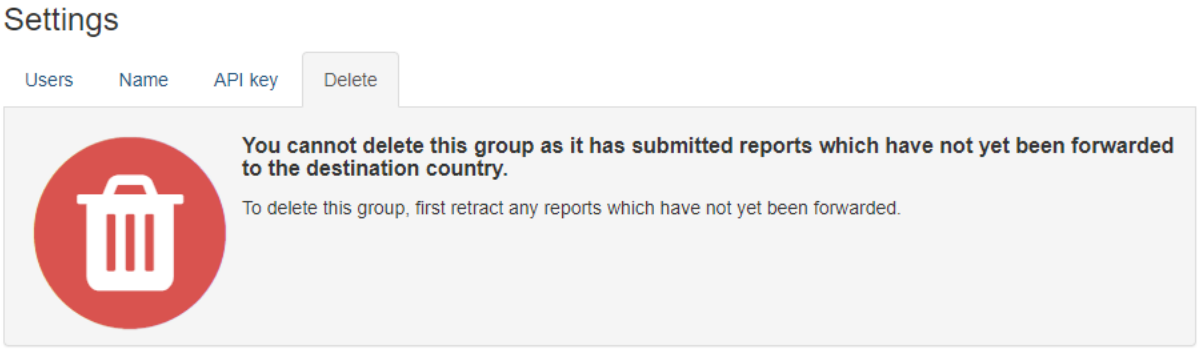


Delete a Group

The Delete tab allows you to delete a Group in limited circumstances.



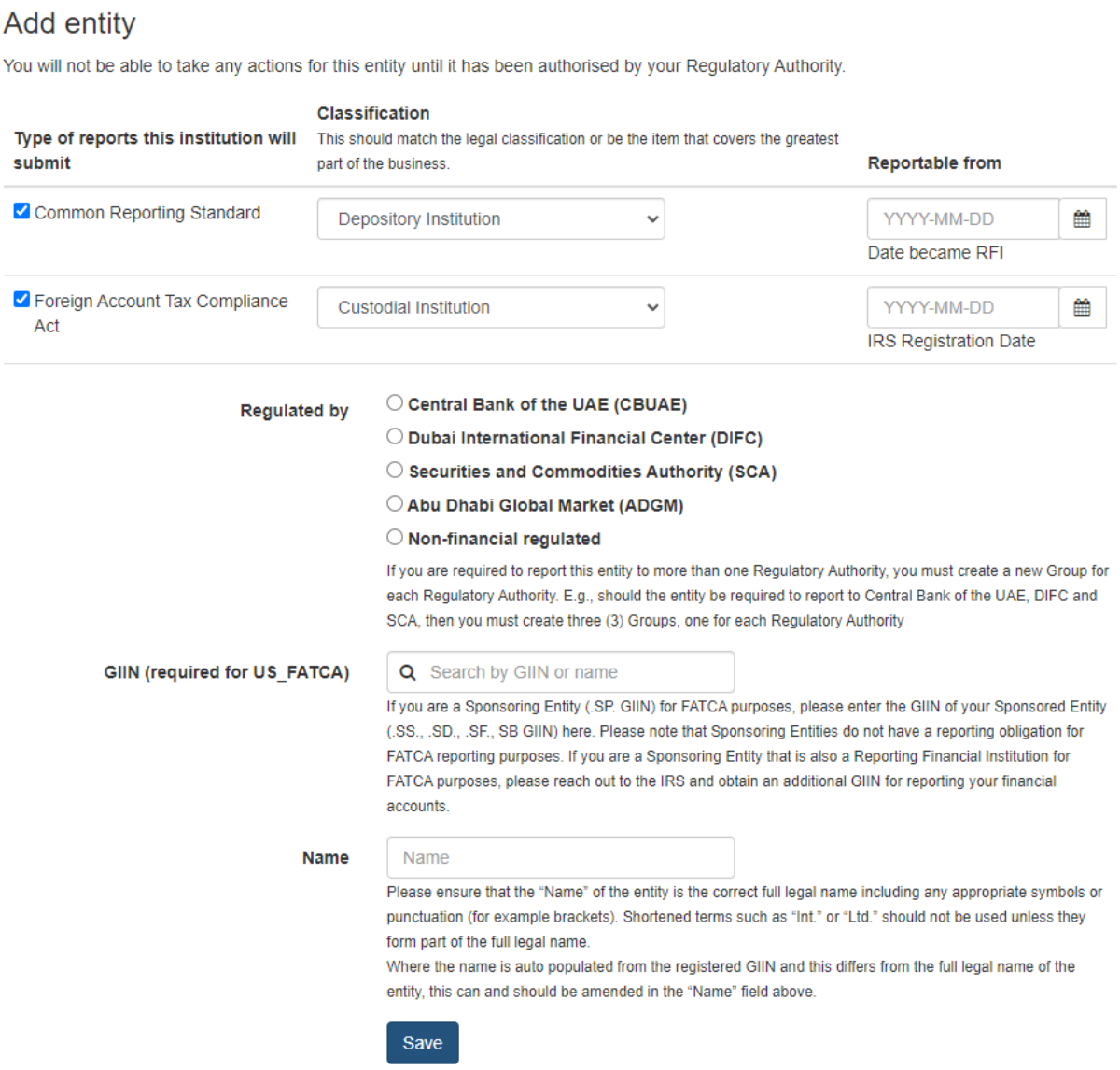
A message will be provided if it cannot be deleted.



1.3 FATCA/CRS System Registration Process

Add one or more financial institutions within a Group

Click on **+ Add new Entity**



Select the type of reports the financial institution will submit (CRS and/or FATCA).

Select the Classification from the drop-down.

Enter the date you became a Reporting Financial Institution. Please note that this is not applicable to entities that are not Reporting Financial Institutions. The button on the right provides a calendar popup.

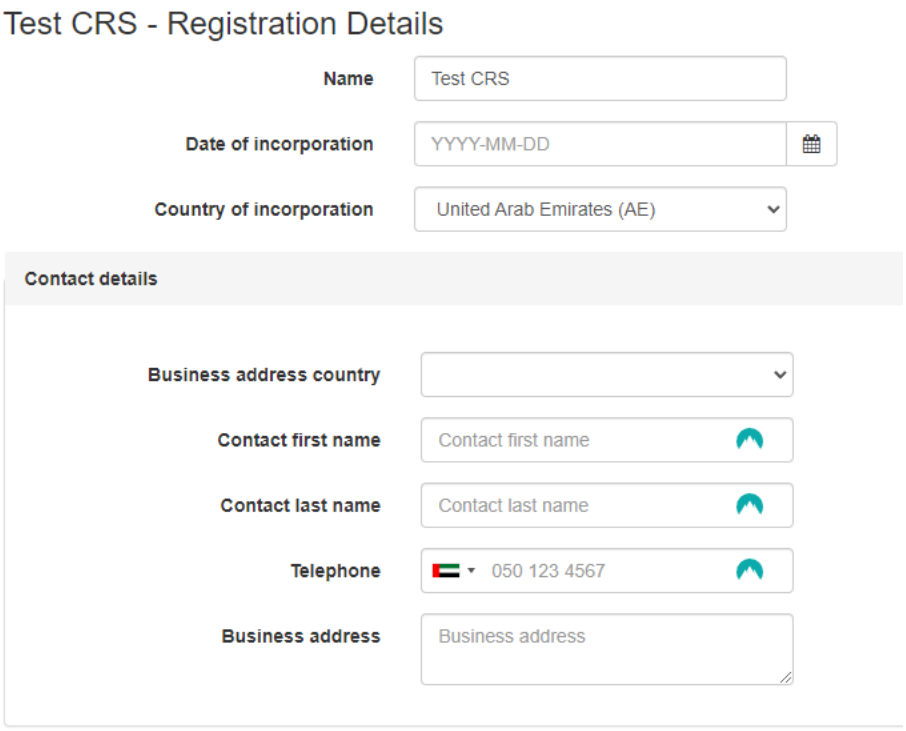
Select the Regulatory Authority that regulates the Financial Institution.

Search for the GIIN (Global Intermediary Identification Number) or name (if the RFI will be submitting data for FATCA purposes). If you do not select FATCA reporting, the GIIN is optional.
Please note that the system will only trigger a reporting obligation (for annual/nil reporting, risk assessment questionnaires and other actions) if an entity classifies itself as a Reporting Financial Institution for FATCA and/or CRS purposes.

Please note that the system only allows UAE Reporting Financial Institutions registered and published on the US IRS FFI list, which is updated on a monthly basis. If you have recently registered with the IRS, you will not be able to register on the FATCA/CRS system until your GIIN appears on the US IRS FFI list.

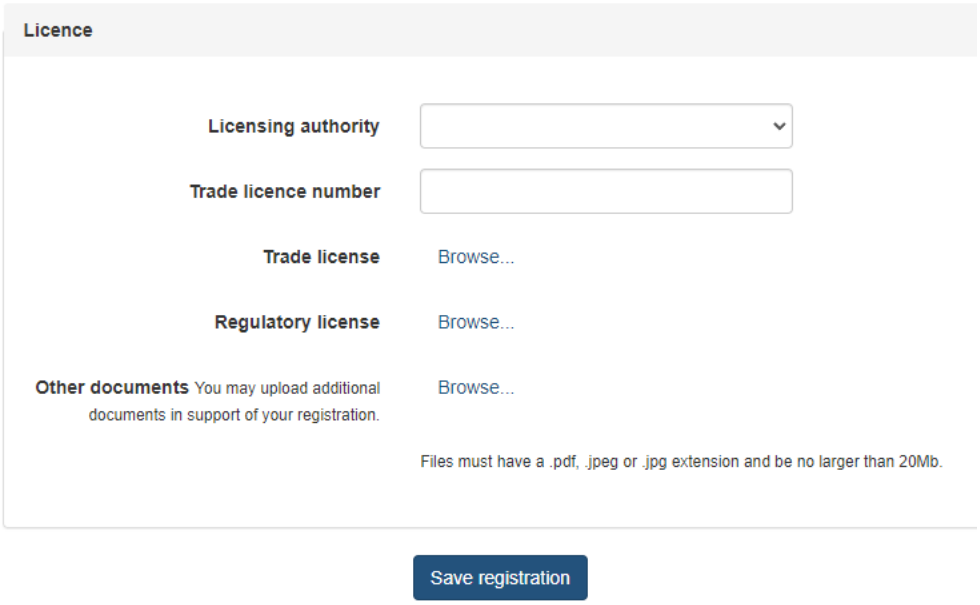
Note: If you are a Sponsoring Entity (.SP. GIIN) for FATCA purposes, please enter the GIIN of your Sponsored Entity (.SS., .SD., .SF., SB GIIN). The Sponsoring Entity information will be entered on the next page.

Sponsoring Entities do not have a reporting obligation for FATCA reporting purposes. If you
are a Sponsoring Entity that is also a Reporting Financial Institution for FATCA purposes,
please reach out to the IRS and obtain an additional GIIN for reporting your financial accounts.



The Name will be included from the previous screen.

The Date of Incorporation needs to be entered in the form YYYY-MM-DD (Year, Month and
Day). The button to the right allows the Calendar popup. Please note: The date of incorporation must be on or before the Reportable from date on the previous screen.
The County of Incorporation is a drop down. The UAE is the top item in the list.
Please enter the Business address, Contact First Name, Contact Last name, Telephone number and Business Address. The Telephone number is validated.



Please select the Licensing Authority from the drop-down list together with the Trade License number.

You will need to add a copy of your Trade License and Regulatory License. Trade license is mandatory for all entities, regulatory license is a mandatory upload if an entity has been issued a Regulatory License.

"Other documents" are optional.

Press Browse and this will allow you to navigate to the document you have saved on your system. Please note they must have a .pdf, .jpeg or .jpg extension and be no larger than 20Mb.

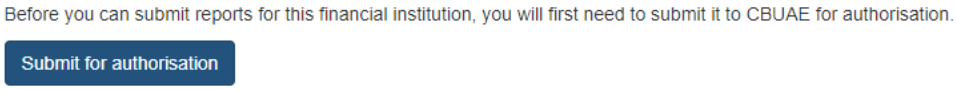
Press **Save registration**

UAE Ministry of Finance FATCA/CRS system will inform you if any missing information is required on the screen.

Please note, you will be able to Save if you have not included your scanned Trade license and Regulatory license, but will not be able to submit the Registration to the Regulatory Authority for authorization until these have been included.

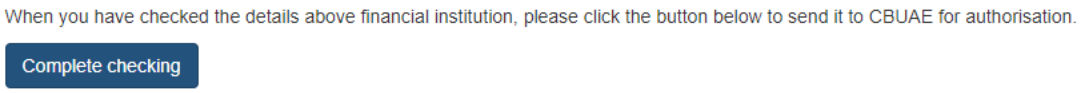
UAE Ministry of Finance FATCA/CRS system will show a summary of the information to be submitted.

When you have completed all the information, you can press the Submit for Authorisation
button.



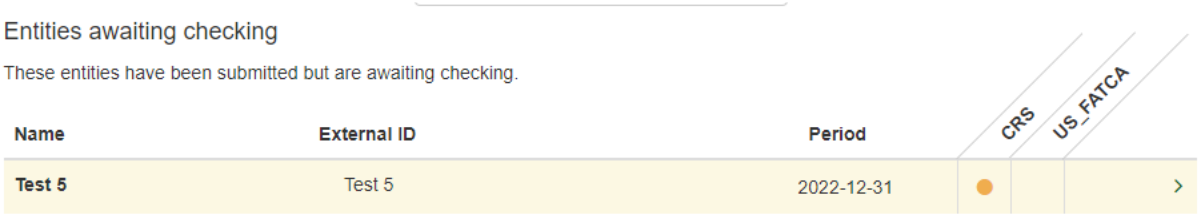
Maker / Checker: When you press Submit for authorisation, the Registration moves from Maker to Checker status. You will not be able to check your own work. For more information on the Maker/Checker process, please refer to the Maker Checker user guide

The following message will be displayed

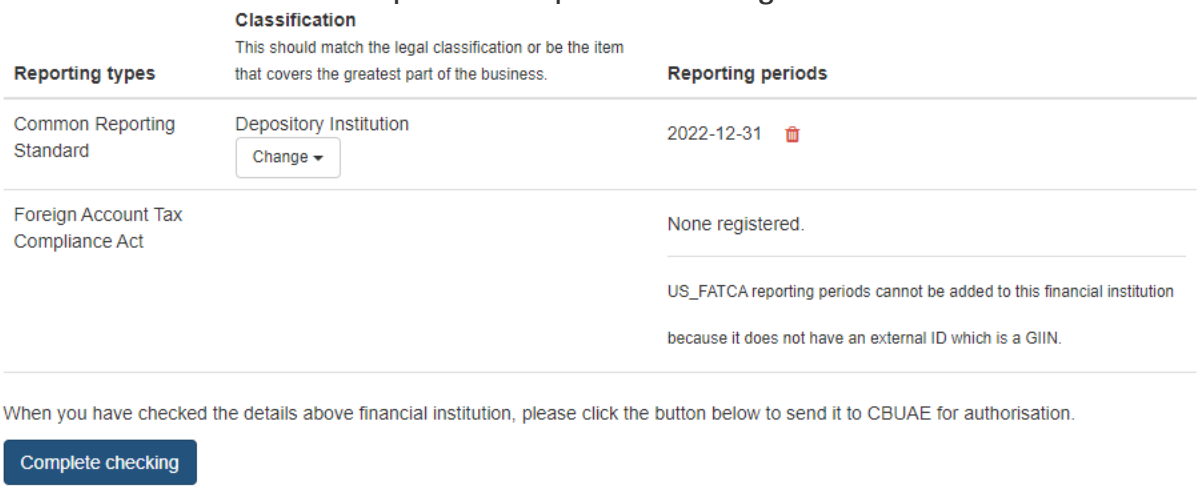


You will be unable to submit reports for a newly added financial institution until it has been authorized by the Regulatory Authority.

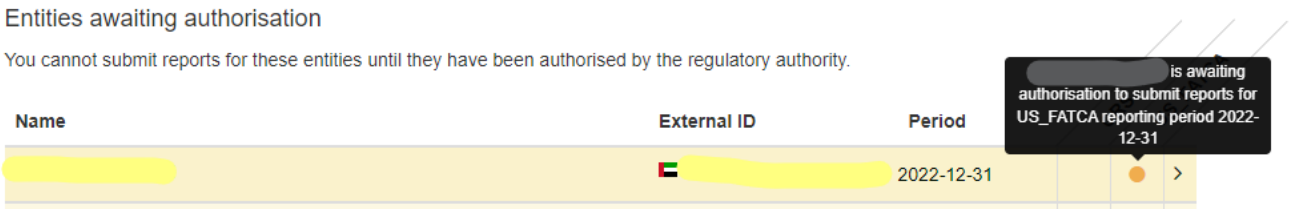
The Registration will appear in the Entities awaiting Checking section of the screen and an email will be sent, notifying the checkers within your group.



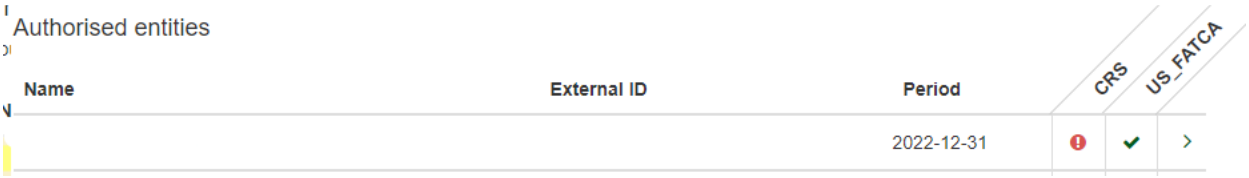
Maker / Checker: The Checker needs to log into the system, select the registration, check the information and press Complete Checking



The Financial Institution appears in the "Entities awaiting authorization" section and has a yellow background until authorized.

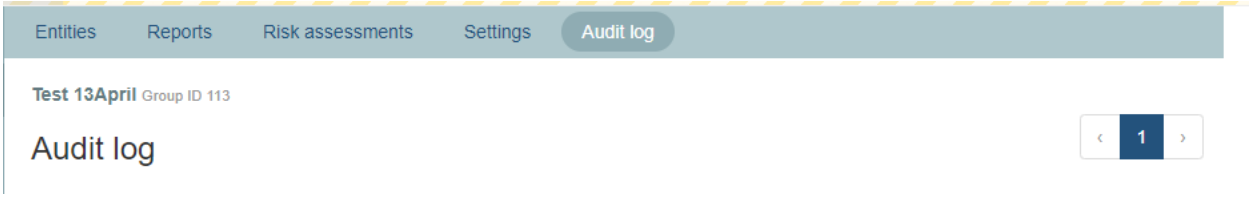


Once the Entity has been authorized, you will receive a message, the information will appear under the Authorized Entities section and the background will be white.



Audit Log

An audit log is available which shows the various activities of maker and checker.



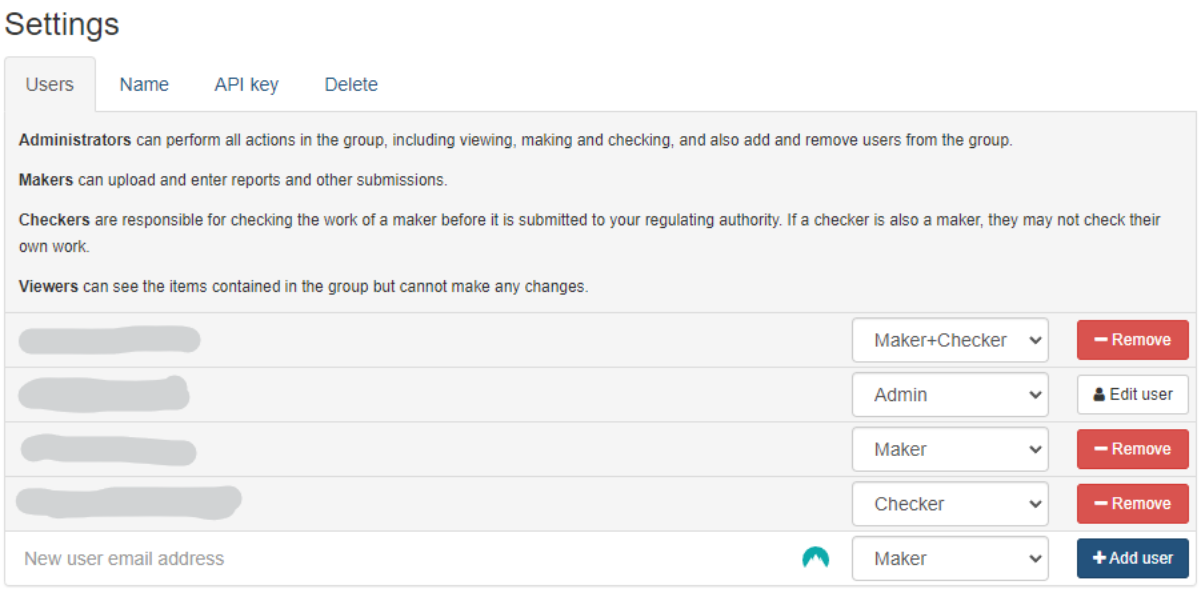
Next Steps

Now you have completed registration, you can go to the next stage.

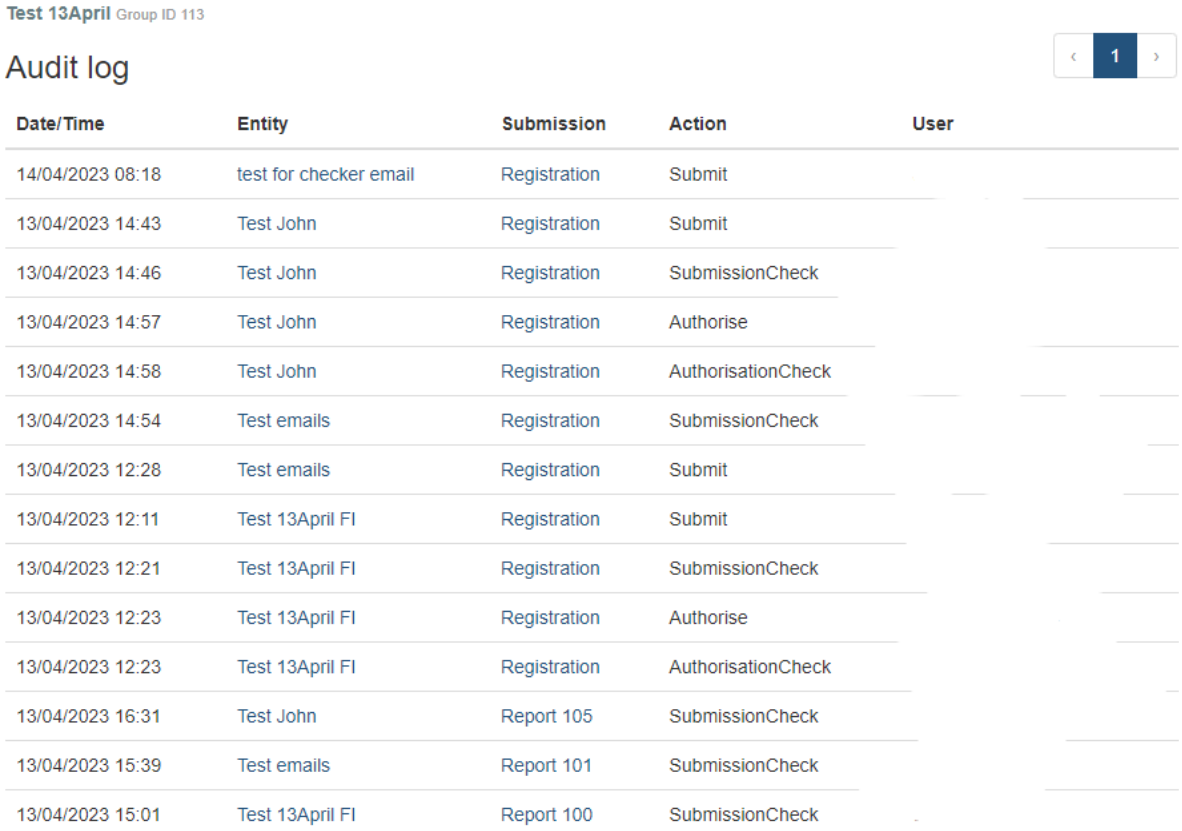
1.4 Maker / Checker

Makers and Checkers are set up in the **Settings**. Only the Admin can add users and change the settings.

All actions undertaken by users on the FATCA/CRS system are required to have a review process (i.e., a Maker user is able to perform an action, a Checker user is able to review the action and submit for authorization by the Regulatory Authority).



A person who is Maker and Checker may not check their own work. In order to provide transparency, the Audit log of Maker Checker actions are recorded under the Audit Log menu item with the user names displayed.

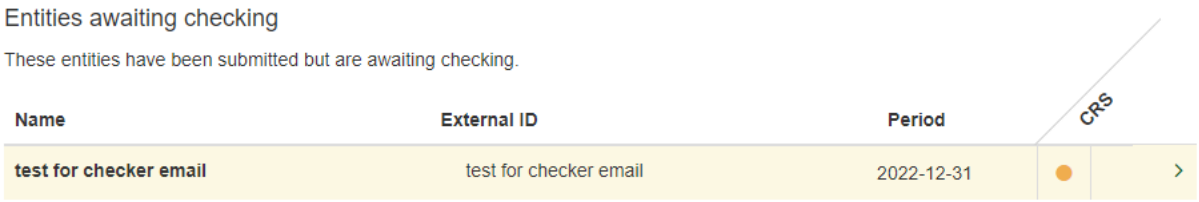


RFI Registrations

When you register an FI, you must be a Maker or Maker+Checker.

At the end of the form, when you Submit for Authorisation, an email will go to all Checkers

It will also show under the Entities menu item as follows:



When the Checker goes into the system, they can Complete checking or Reject the item.

If the RFI registration is rejected by the RA, you will receive an email informing you of this.

The Maker user is then able to amend the registration and re-submit to the Checker user for approval.

Report Submissions (Annual Reporting / Nil Return)

When an Annual Report or Nil Return without errors has been submitted, the user will get a
message saying, "Report submitted successfully". There may be some warnings which will
be passed on to the Regulatory Authority, but provided there are no errors, it can be submitted.

Going back to the Reports menu, select the report and review the contents are correct. At
this point, it can be Accepted or Rejected. The same applies to Nil Returns.
For more information on Data Submission (Annual Reporting / Nil Returns), please refer to
the next section.

1.5 FATCA / CRS Scenarios

1.5.1 RFI Registration Scenarios

1.5.1.1 Single RFI reporting to Single RA

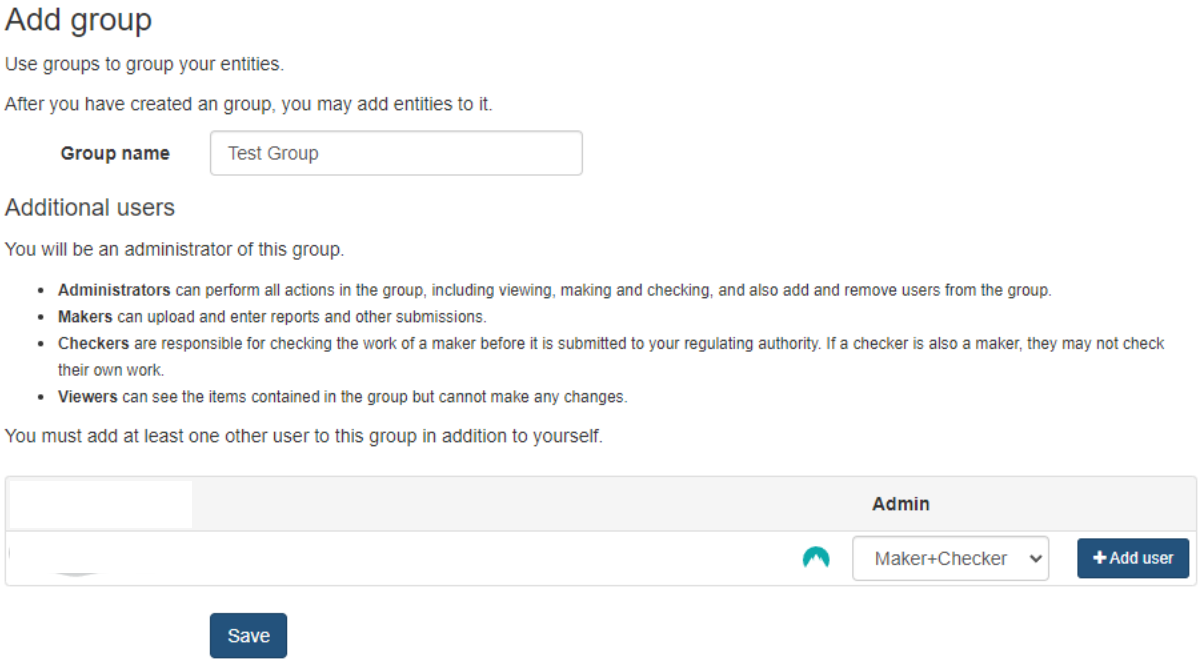
Scenario: I am a Single Financial Institution reporting to a single Regulatory Authority. How do I register?

You have logged into the system. You will have been allocated one of the following roles:

- **Administrators** can perform all actions in the group, including viewing, making and checking, and also add and remove users from the group.
- **Makers** can upload and enter reports and other submissions.
- **Checkers** are responsible for checking the work of a maker before it is submitted to your regulating authority. If a checker is also a maker, they may not check their own work.
- **Viewers** can see the items contained in the group but cannot make any changes.

Create a Group

The purpose of a group is to save you time in setting up one or more financial institutions with the same administrator, maker and checker. You give the group a name and add users to the group. The person creating the group will be the administrator.

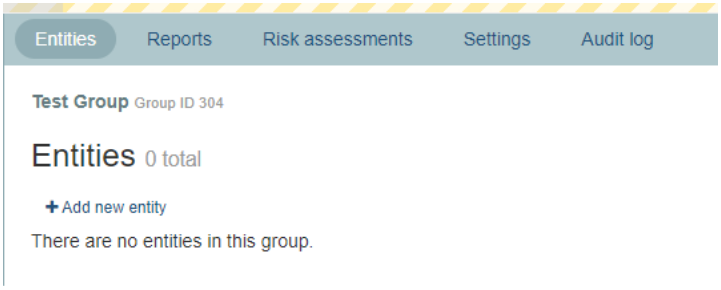


Press Save

The Group name will appear in the left column.

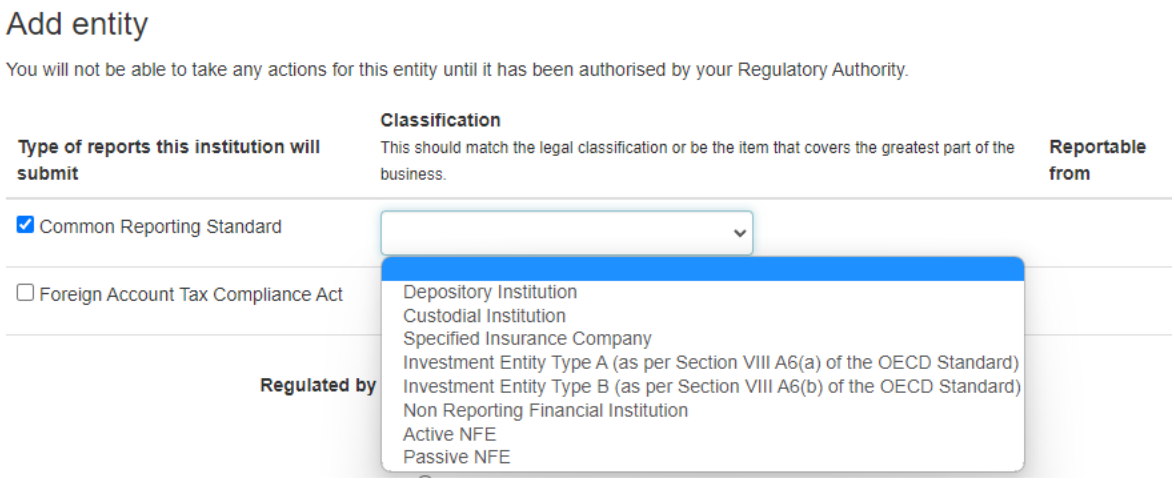
Add Entity

Add a new Entity / Financial Institution by clicking on the +Add new entity

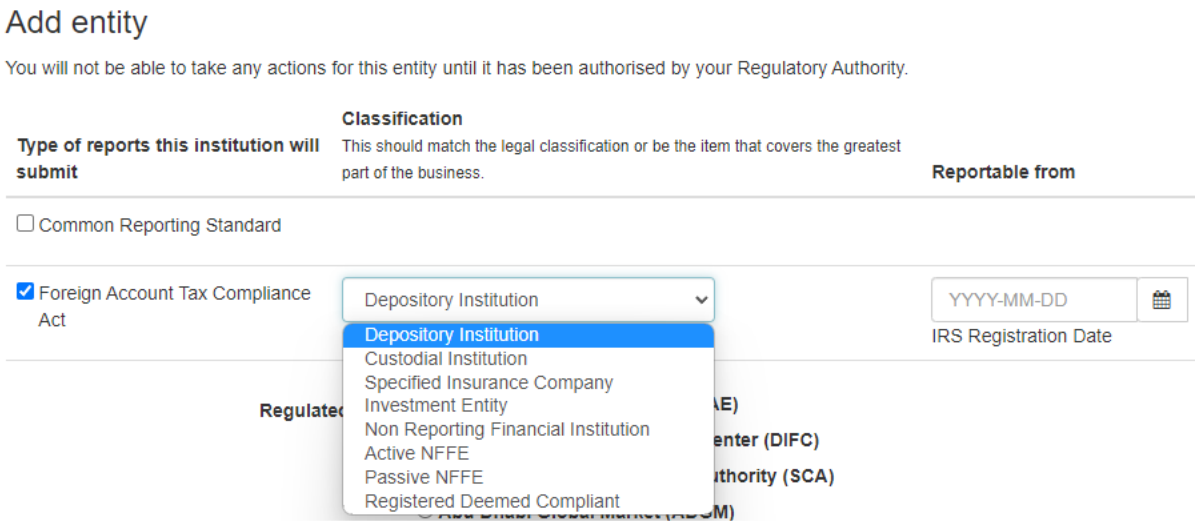


This will bring up the Add entity screen.
Note: You will not be able to take any actions for this entity until it has been authorized by your Regulatory Authority.

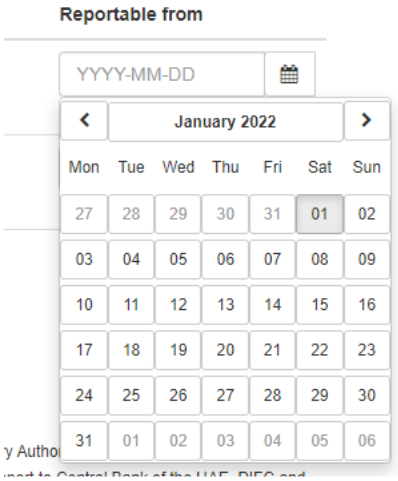
Clicking on the CRS box will provide a Classification dropdown which must be completed.



A similar dropdown is provided for FATCA Classifications.



The Reportable from date can be entered manually or using the calendar tool.



Select who you are Regulated by. Please note you can only select one Regulator. If you have more than one Regulator, please choose one of your regulators, and after completing the setup, refer to the Guides for information on "more than one Regulator".

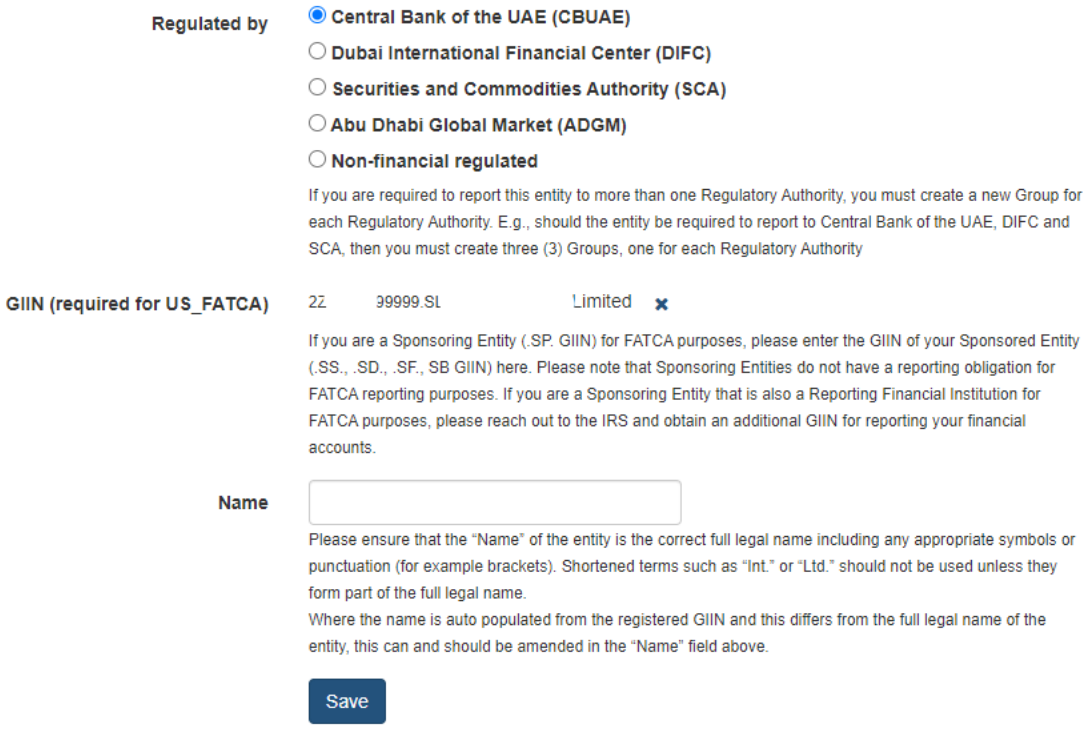
If you are Registering for CRS only, the GIIN is optional.

If your registration includes FATCA, then the GIIN is mandatory.

GIIN

The full list of GIINs in the system is kept up to date. However, please note the IRS currently update their GIIN list once a month. So it may be a few weeks before a newly issued GIIN appears.

Type in part of the name or the GIIN number, and the system will search for UAE GIINs which match. Select the correct GIIN.



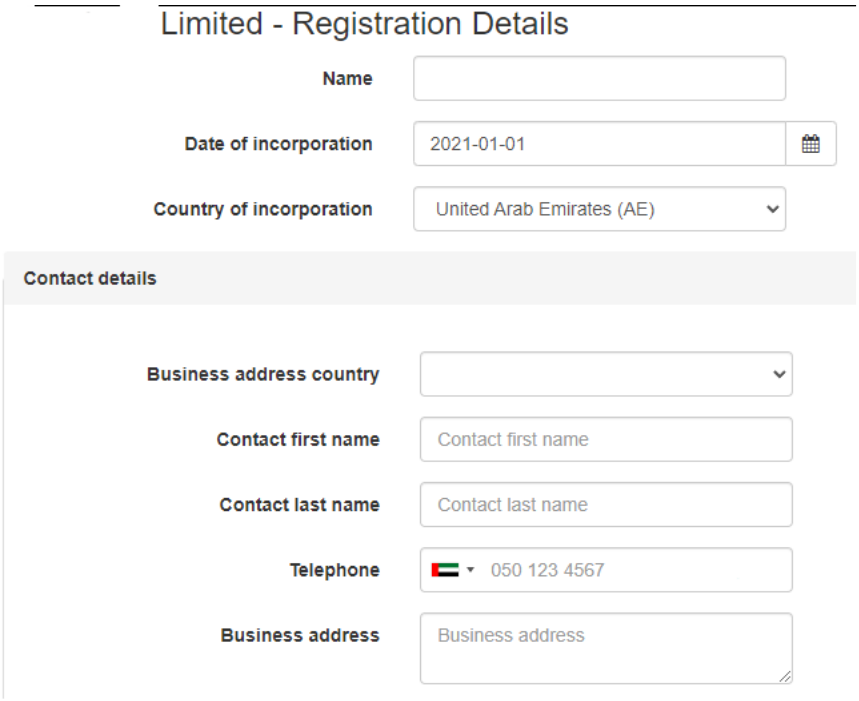
Note: If you are a Sponsoring Entity (.SP. GIIN) for FATCA purposes, please refer to the
Guide related to Sponsors.

Once completed, press **Save**

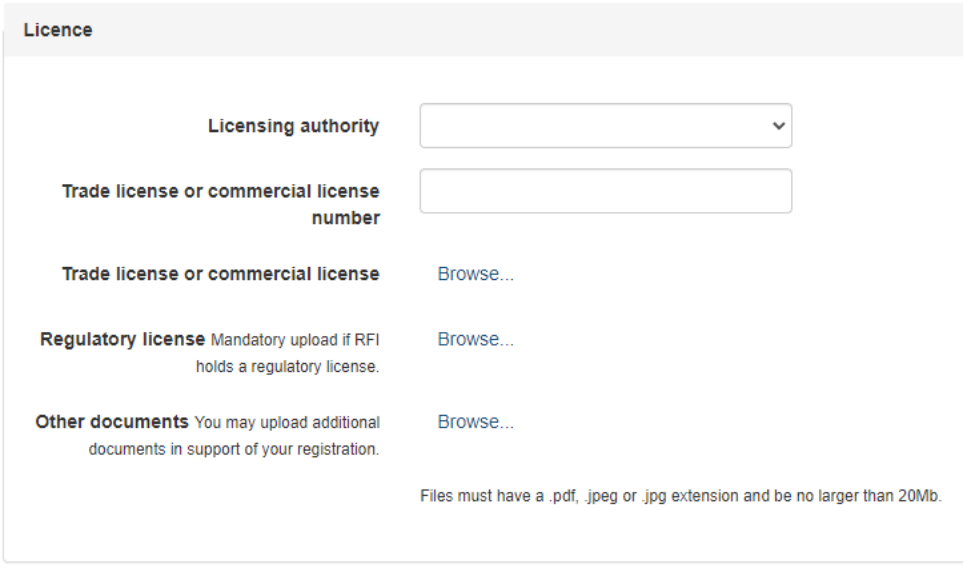
Registration Details

Complete the form, including

- Date of Incorporation
- Business address country
- Contact first name
- Contact last name
- Telephone number (which is validated)
- Business address



The bottom part of the form requires Licence information.



The licencing authority is a drop-down list.

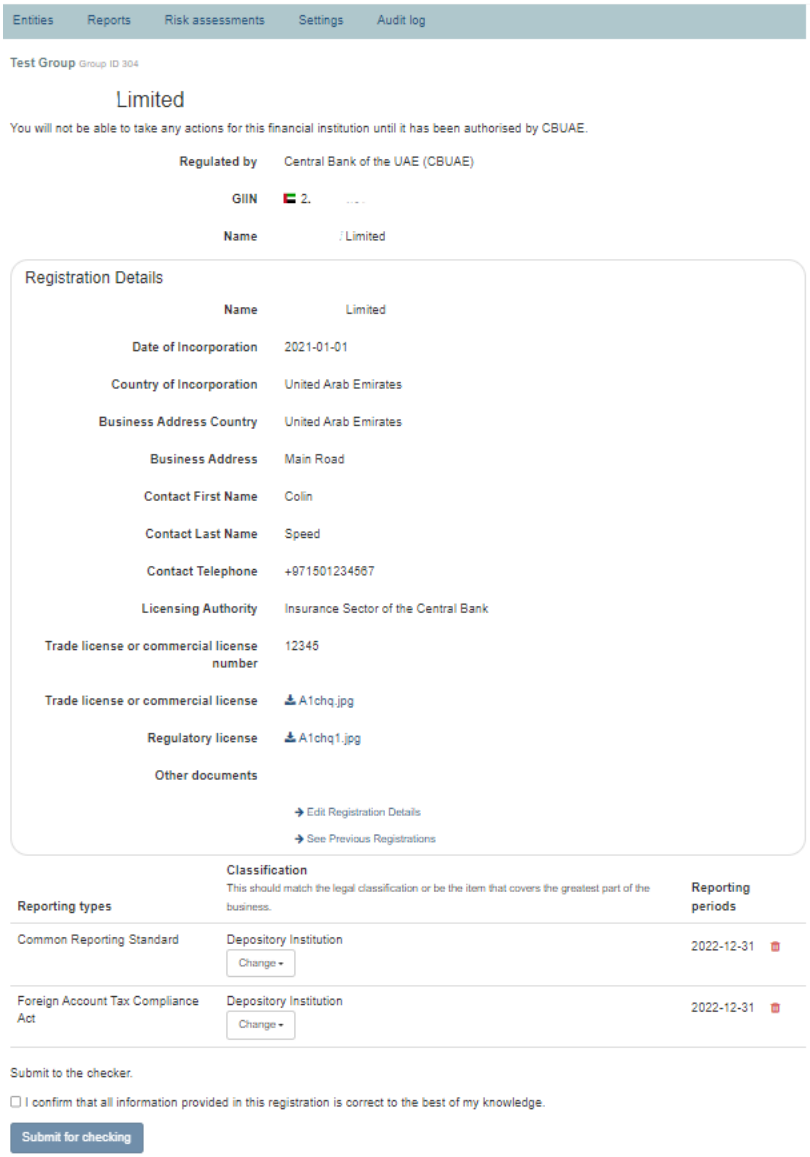
The Trade or Commercial licence and Regulatory licence can be uploaded in .pdf, .jpeg or .jpg format.

The registration can be saved, and items such as the uploaded licences can be added later.

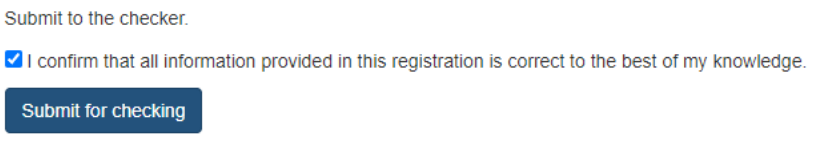
However, the Registration cannot be Submitted for Checking until all the information has been provided.

Summary

A summary of the information entered will be shown and can now be Submitted for Checking.



To Submit for Checking, click on the box to confirm the information provided is correct and press the Submit for Checking button.



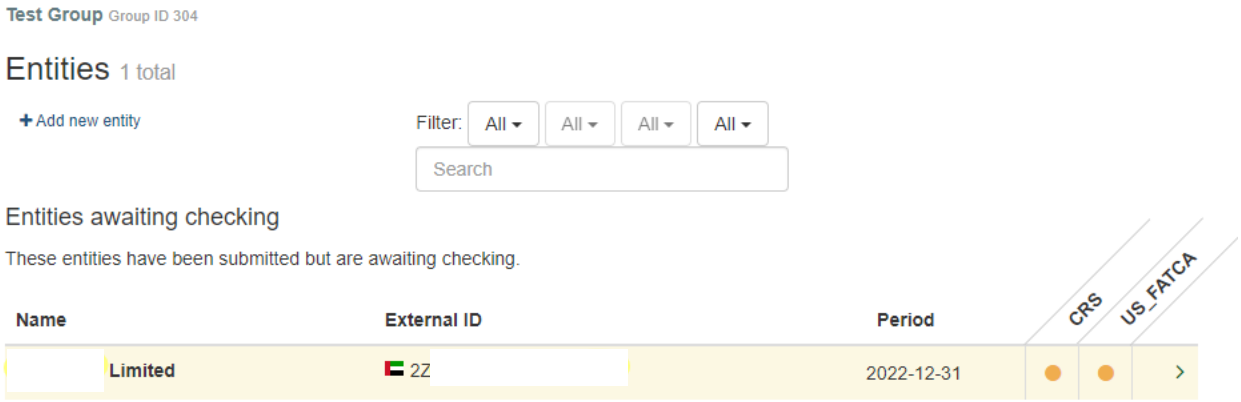
The Checkers within the group will receive an email informing them there is a new RFI Registration which is awaiting checking.

Note: if a Maker is also a Checker, they cannot check their own work.

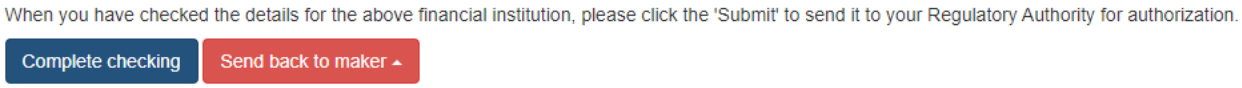
Checking

When the Registration has been submitted for checking, the Checker can sign into the system and perform this action.

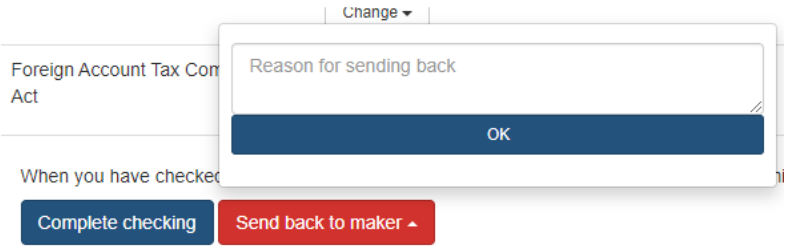
Clicking on the Group name in the left column, they will see the following screen of Entities awaiting checking. The yellow colour means it has not yet been authorised by the Regulatory Authority.



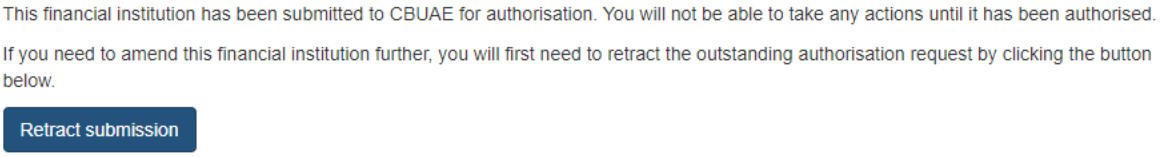
Clicking on the name of the Financial Institution screen will allow the user to see the Summary screen with the option to Complete Checking or Send Back to Maker.



If they wish to send back to Maker, then a Reason must be provided.



This important message will be displayed.



Completion of RFI Registration

This completes the RFI Registration process.

You will be informed once the Regulatory Authority has approved (or rejects) your Registration.

Note: Data File Submissions (Excel spreadsheets) cannot be submitted until the Financial
Institution has been Authorised.

1.5.1.2 Single RFI Reporting to multiple RAs

Scenario: I am a Single Financial Institution reporting to a multiple Regulatory Authority. How do I register?

Please register as normal for one Regulatory Authority using the instructions contained in the following Guide document.

Single RFI reporting to single RA

In order to complete a Registration for a second Regulatory Authority, you will need to set up a new Group. A Financial Institution with the same Name and / or GIIN cannot be registered in the same Group.

The process is as follows:

RFI registration for the first Regulatory Authority

- Create a group and set up the users (you may wish to include the name of the Regulatory Authority in the Group name)
- Add a new Entity / Financial Institution
- Select one of the Regulatory Authorities
- Complete the Registration form and Submit for Checking
- The Registration form is Checked by the Checker and forwarded to the Regulatory Authority you selected for Authorisation

RFI registration for the second or more Regulatory Authorities

- Create another group and set up the users (the users can be the same as the first group) (you may wish to include the name of the Regulatory Authority in the Group name)
- Add a new Entity / Financial Institution
- Select the next Regulatory Authorities that you report to
- Complete the Registration form and Submit for Checking
- The Registration form is Checked by the Checker and forwarded to the Regulatory Authority you selected for Authorisation

Submission of files

Note: When you submit the files for reporting purposes, there will need to be a separate file
for each Regulatory Authority.

1.5.1.3 Single RFI submitting FATCA only

Scenario: I am a Single Financial Institution, and I will be registering and submitting FATCA files only

All entities that select a Reporting Financial Institution classification for the purposes of FATCA are required to provide a GIIN. i.e. Depository Institution, Custodial Institution, Specified Insurance Company, Investment Entity or Registered Deemed Compliant FFI.

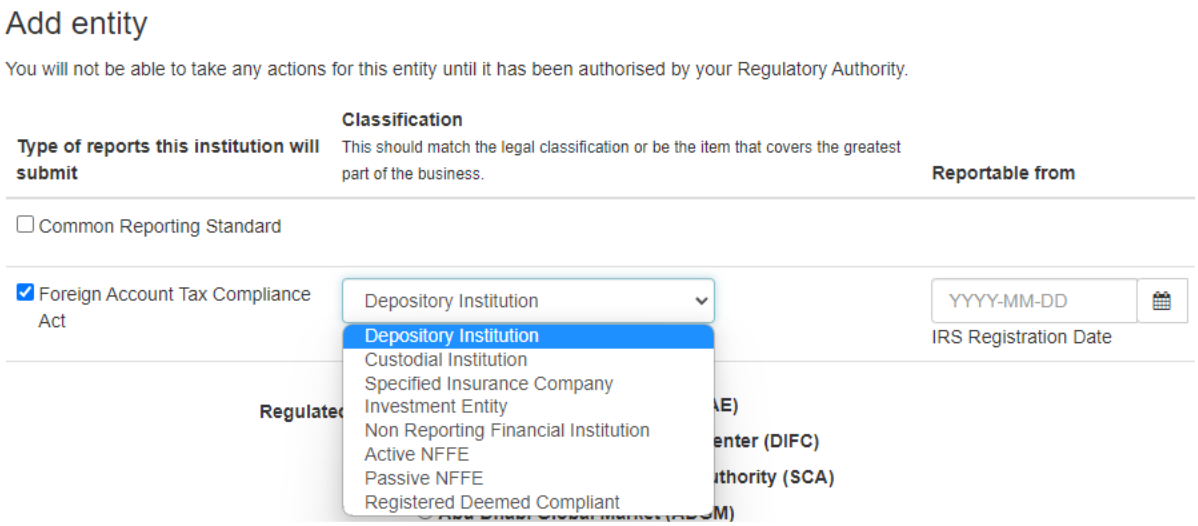
Please note that Registered Deemed Compliant FFIs are required to provide their GIINs, but a reporting obligation is not triggered if that classification is selected (i.e. Registered Deemed Compliant FFIs are not required to report annual or nil returns).

The system allows FATCA only registration, CRS only registration and both CRS and FATCA registration.

Please register in the normal way Single RFI reporting to single RA

If the RFI wishes to register for FATCA only, or for FACTA and CRS, the information required is the same.

This includes the IRS Registration date and the FATCA Classification.



Global Intermediary Identification Number (GIIN)

The GIIN is also mandatory.

The GIIN list is "A monthly published list of Financial Institutions registered, accepted,

and issued a Global Intermediary Identification Number (GIIN) in accordance with FATCA regulations."

As it is published monthly, please allow adequate time to Register and meet your reporting obligations.

The user can search for the GIIN using the GIIN or the name of the Entity.

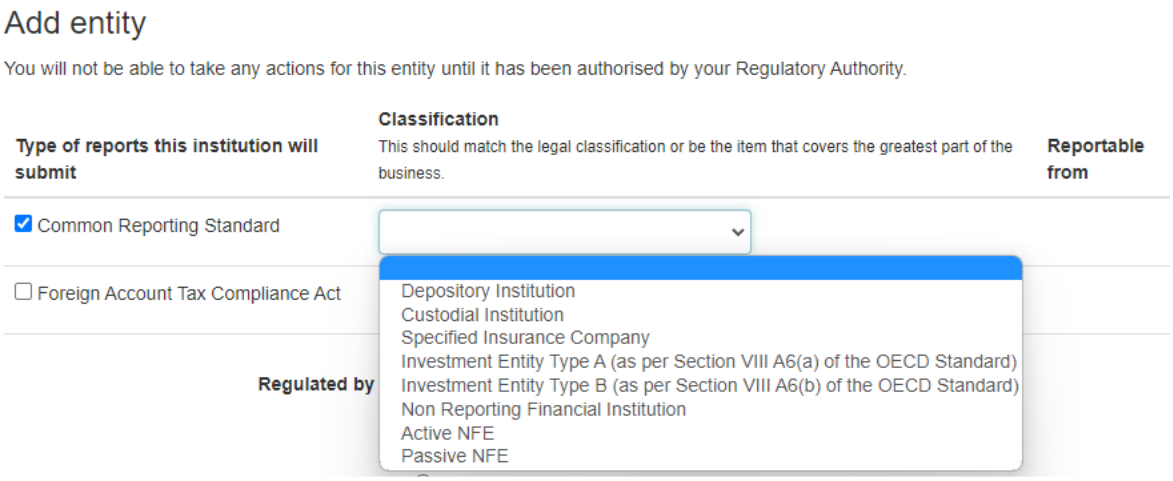
1.5.1.4 Single RFI submitting CRS only

Scenario: I am a Single Financial Institution, and I will be registering and submitting CRS files only

The system allows CRS only registration.
Please register in the normal way Single RFI reporting to single RA

If the RFI wishes to register for CRS only the requirements are slightly different to FATCA only or CRS and FATCA Registration.

The user selects Common Reporting Standard



The classification must be selected and if the RFI has a reporting obligation, the Date became RFI needs to be completed. This determines the first reporting date.

The GIIN is optional.

Note: Please ensure that the "Name" of the entity is the correct full legal name including any appropriate symbols or punctuation (for example brackets). Shortened terms such as "Int." or "Ltd." should not be used unless they form part of the full legal name.
Where the name is auto-populated from the registered GIIN and this differs from the full legal name of the entity, this can and should be amended in the "Name" field.

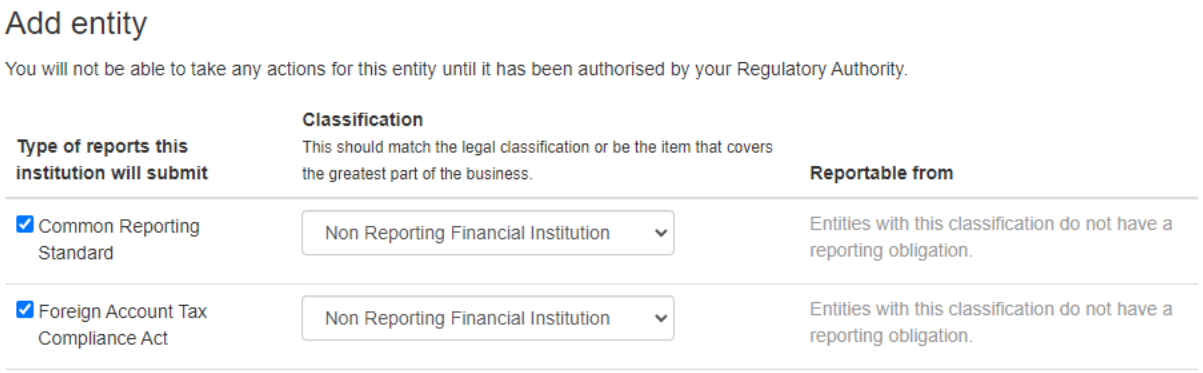
1.5.1.5 Single entity who is non-reporting

Scenario: I am a Single Entity and I do not have a reporting obligation

Please register in the normal way Single RFI reporting to single RA

The Legal Classification will determine the Entity's reporting requirements.

If the entity will be non-reporting, the Reportable date field will disappear and be replaced by text which says "Entities with this classification do not have a reporting obligation."



The remainder of the Registration form still needs to be completed, go through the checking process and be submitted to the Regulatory Authority for authorisation. If authorisation is denied, a reason will be given and the application will need to be resubmitted.

1.5.1.6 Sponsoring entity FATCA only

Scenario: I am a Sponsoring Entity, registering for FATCA only. How do I register?

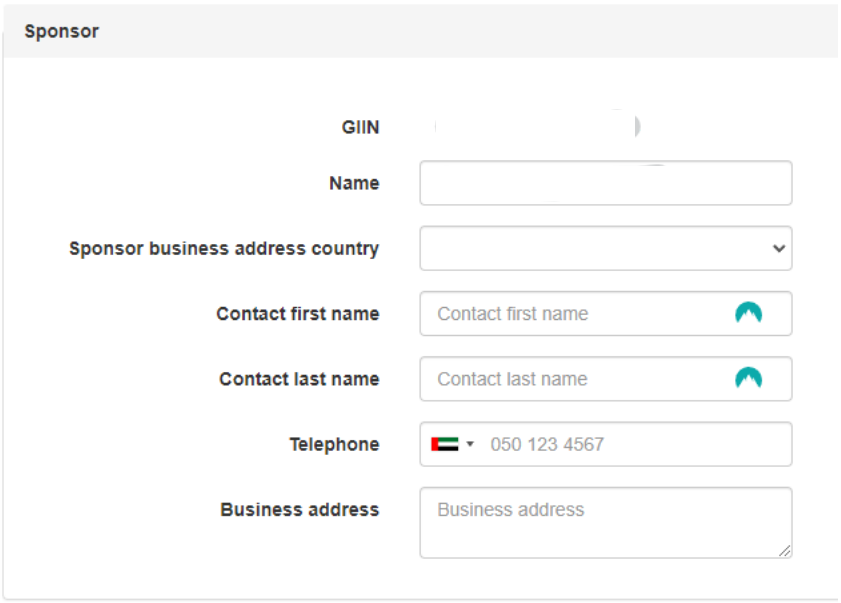
Please register as normal for one Regulatory Authority using the instructions contained in the following Guide document.

Single RFI reporting to single RA

If you are a Sponsoring Entity (.SP. GIIN) for FATCA purposes, please enter the GIIN of your Sponsored Entity (.SS., .SD., .SF., SB GIIN).

The first 6 characters of the GIIN will be the same for the SS and SP for example. You cannot search on .SS., .SD., .SF., SB., SP. GIINs

The second screen will include an additional section at the bottom of the page which requires information to be completed on the Sponsor.



Note: Sponsoring Entities do not have a reporting obligation for FATCA reporting purposes.

Note: If you are a Sponsoring Entity that is also a Reporting Financial Institution for FATCA purposes, please reach out to the IRS and obtain an additional GIIN for reporting your financial accounts and register separately using that GIIN.

1.5.1.7 Sponsoring entity which has CRS obligation

With respect to Sponsoring Entity that has a CRS obligation -
A Sponsoring Entity (with a .SP. GIIN) in the UAE may have a reporting obligation for FATCA and CRS.

- In case that they have a reporting obligation for FATCA, they must obtain a reporting GIIN from the IRS (e.g. SL, LE, ME GIIN) as they are not able to report their own financial accounts with a (.SP.) GIIN (and the SP GIIN will not be found in the registration form)
- Where this entity also has a reporting obligation for CRS, they must register the RFI for CRS using the Trade License number. This may mean registering for CRS only until they have obtained a new GIIN from the IRS and the FFI list is published (on a monthly basis).

1.5.1.8 Registered Deemed Compliant FFI

With respect to Registered Deemed Compliant FFIs:

- A Registered Deemed Compliant FFI, under FATCA, has a GIIN but does not have a reporting obligation.
- When registering a Deemed Compliant FFI, the RFI is declaring that they do not have a reporting obligation.

- In case the RFI does not meet this exemption, they are required to change the entity classification type in order to report their financial accounts.
- Incorrect declaration may lead to penalties by the Regulatory Authority.

1.5.1.9 Multiple entity, multiple RAs

Scenario: I wish to register multiple Financial Institutions reporting to multiple Regulatory Authorities. How do I register?

The recommended approach is to create a group for each Regulatory Authority and include the name of the RA in the name of the group.

For example: Test Group CBUAE (please use whatever group name you wish)

Although a group can contain RFIs regulated by different RAs, an RFI cannot be entered twice in the same Group.

Set up all the RFIs in the "Test Group CBUAE" which are regulated by Central Bank and all the RFIs in "Test Group DIFC" which are regulated by Dubai International Financial Center.

The rest of the process is as per the following guidance document Single RFI reporting to single RA

1.5.2 User Rights

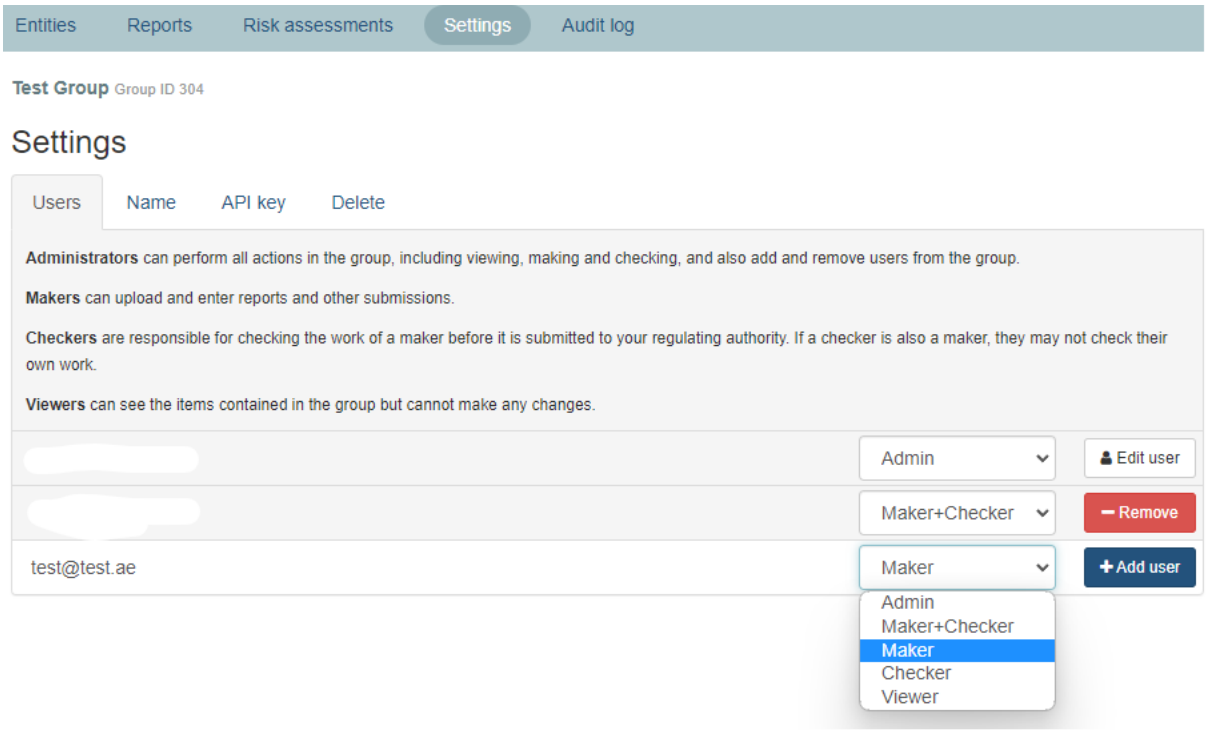
1.5.2.1 Assigning user rights and roles

Scenario: I have set up my group but wish to change the user rights and roles.

This scenario assumes you have already set up a group as per Single RFI reporting to single RA

Select the Group on the left side of the screen.

Select Settings from the Menu



The Administrator only can add and remove users as required and can also amend the role and permissions they have.
If an added user already has a login to the system, they will just be added and notified. If they do not have a login for that email address, they will receive a message asking them to login to the system and set themselves up.

1.5.2.2 Roles

The roles are as follows:
Administrators can perform all actions in the group, including viewing, making, and checking, and also add and remove users from the group.
Makers can upload and enter reports and other submissions.
Checkers are responsible for checking the work of a maker before it is submitted to your regulating authority. If a checker is also a maker, they may not check their own work.
Viewers can see the items contained in the group but cannot make any changes.

A group must have two non-viewer users. The options are as follows in order to carry out the Maker Checker functions.

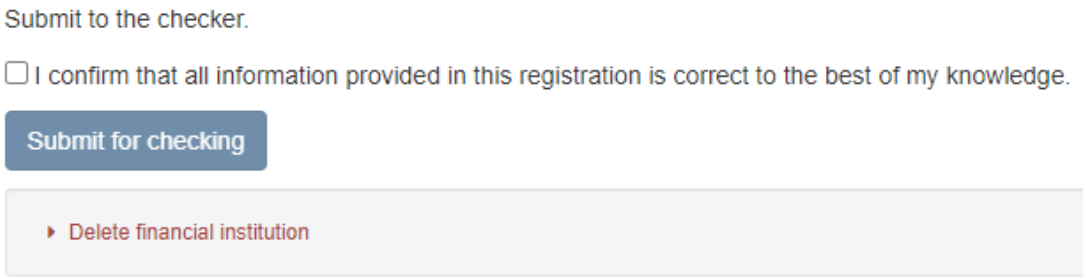
- Administrator and a Maker/Checker.
- Administrator and a Maker
- Administrator and a Checker
- Two Administrators

It is recommended there are at least two Administrators, especially for large organizations. This will mean the users can still be added, changed and removed should one administrator be unavailable.

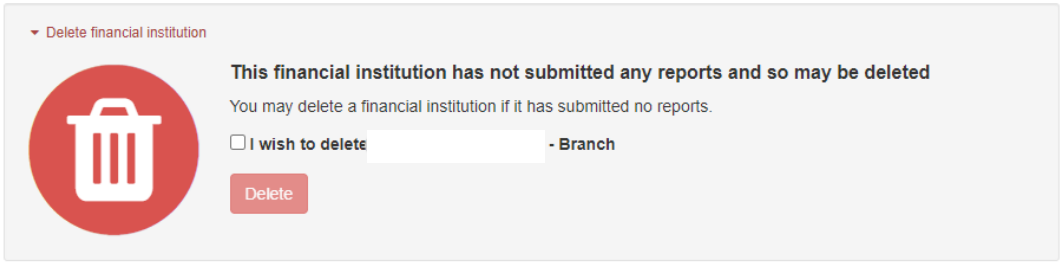
1.5.3 Deleting RFI

Scenario: I would like to delete an RFI that I have set up

An RFI can be deleted at any time, provided it has not submitted any reports.
At the base of the screen, summarizing the RFI registration, is a link to Delete financial institution.



Click on the link and the following screen will appear.



Tick the confirmation box and click on delete.

1.5.4 Maker and Checker scenario

Scenario: How does maker checker work?

Maker checker is used at the Financial Institutions for all submissions

This includes

- RFI Registrations
- Excel Submissions
- Risk Self Assessments

The roles and their maker checker permissions are as follows:

- **Administrators** can perform all actions in the group, including viewing, making and checking, and also add and remove users from the group.
- **Makers** can upload and enter reports and other submissions.
- **Maker + checker** Can carry out the Maker and the Checker role, however, if a checker is also a maker, they may not check their own work.
- **Checkers** are responsible for checking the work of a maker before it is submitted to your regulating authority.

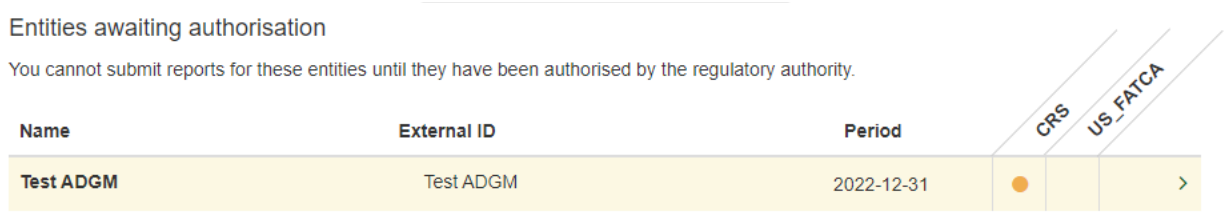
If a checker rejects the submission, then it will revert to the maker.

If an RA declines to authorize a submission, it will revert to the maker.

2 Data Submission (Annual / Nil Reporting)

2.1 Introduction

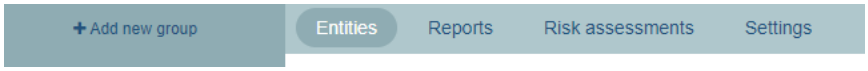
Submissions can only be made once the Financial Institution has been Authorised by the
Regulatory Authority.
If the FI is listed in yellow and under the heading of Awaiting Checking, please advise the
Checker within your organisation that the file needs checking so it can be sent to the Regulatory Authority for Authorisation.
If the FI is listed in yellow and under the heading of Awaiting Authorisation, you cannot
submit a file. This is **not an error,** it is part of the process.



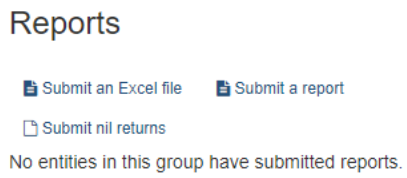
Once authorised, they appear in white under the Authorised entities section

2.2 Submitting a Report

To submit a report, select the Group and the following menu will appear

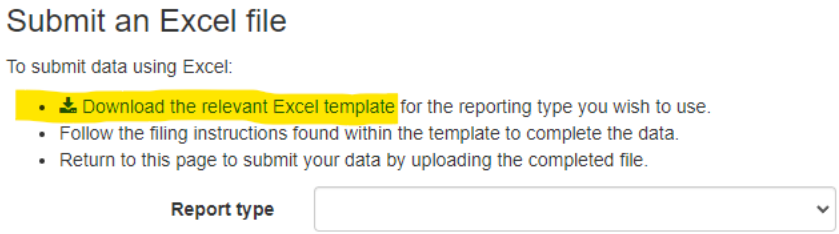


Select Reports
You are provided with 3 options.



2.3 Excel Templates

First, click on the Submit an Excel file and the following screen will be displayed. This contains a link to Download the latest Excel Template for your submission.



The Excel Templates are also available from the main Documentation menu.

The template will normally be downloaded into the downloads folder on your computer.

Only submissions using the Excel templates will be accepted. Please note there are some changes within the templates from previous years.

Please do not change the format of the Excel spreadsheet by adding columns, tabs or anything else that alters the structure of the spreadsheet.

2.4 Excel Submissions

Please complete the Excel spreadsheet for CRS and/or FATCA. The Excel spreadsheet has 2 main tabs

FATCA

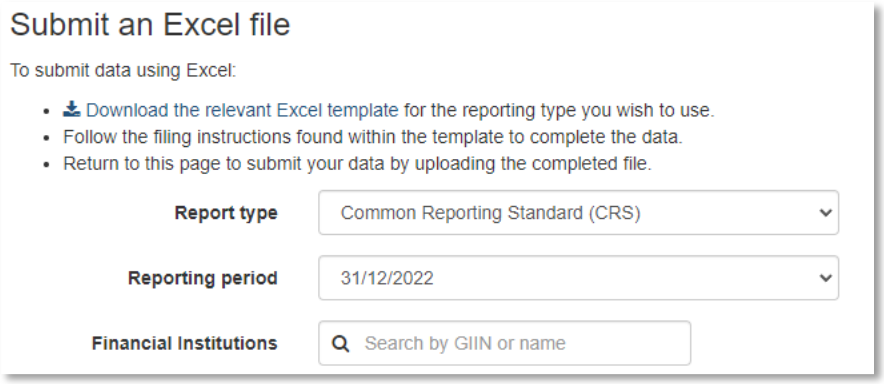
- Accounts
- Substantial owners

CRS

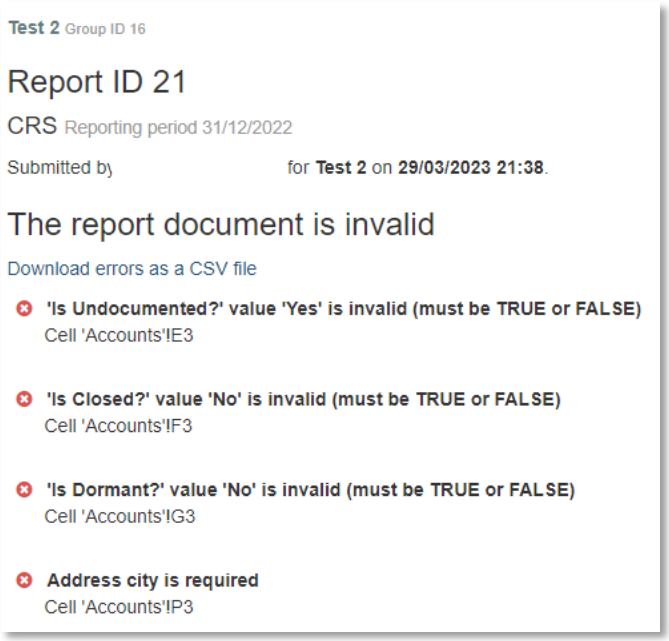
- Accounts
- Controlling Persons

The other tabs in the spreadsheet contain further information which should help you complete the spreadsheets.

Once you have completed and saved the spreadsheet, select the Report Type



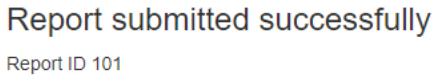
Browse to your file and upload (press open on some browsers).
The system may take a few seconds to process so please do not press any other buttons while processing.
The system will provide you with a list of any errors and the spreadsheet tab name and cell reference, together with a description of the error.



There is also the option to Download the errors as a CSV file which can be opened in Excel.
The file will not be accepted or stored unless it is submitted with no errors.

If there are errors, the Excel spreadsheet needs to be corrected and submitted again until it is correct.

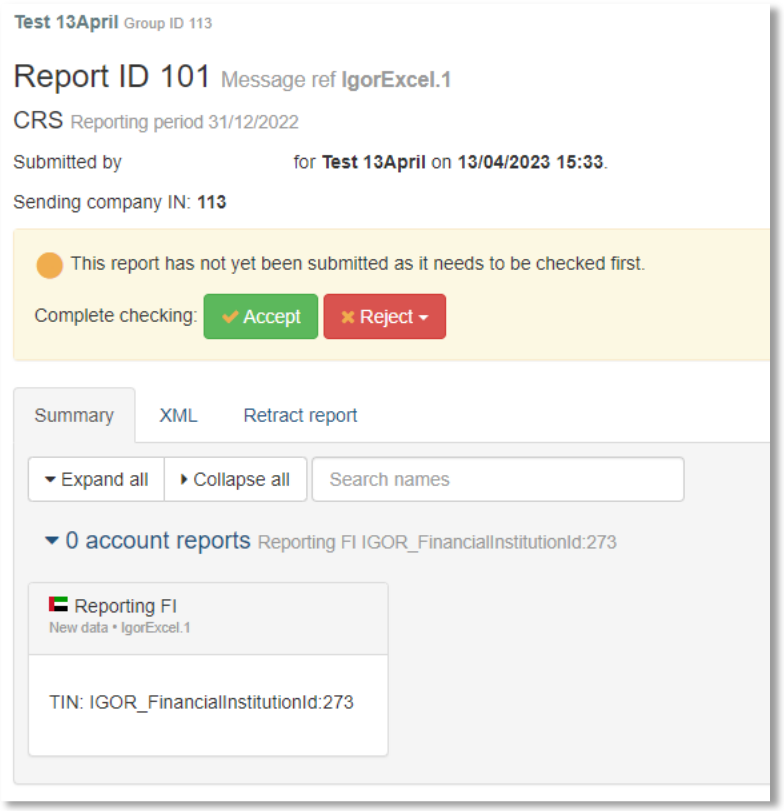
A successful file will show the following message



Maker / Checker: Submitted filed will need to go through the Maker / Checker process.

The file is now awaiting checking.

When the checker Signs into the system and clicks on the file, the file will display as follows:



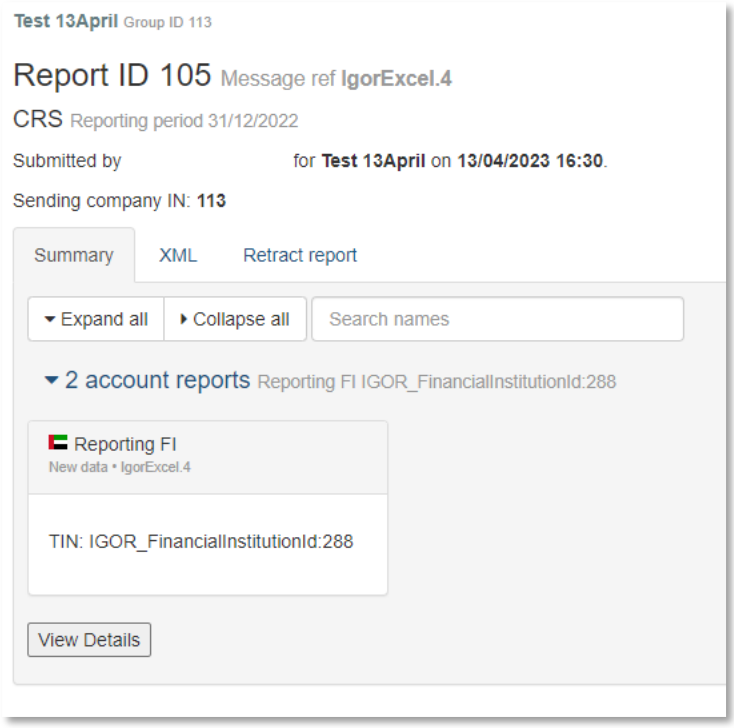
The Checker can either Accept the file or Reject it.

If they reject it, they will need to provide a reason. Click on the Reject button again if you wish to unselect Reject.

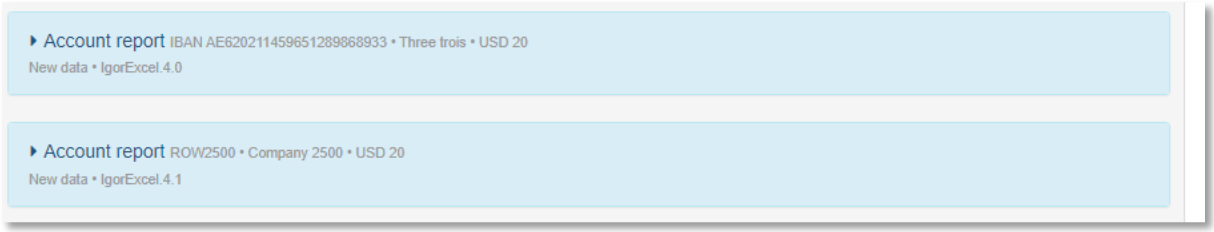
Accept will submit the report to the RA.

Summary

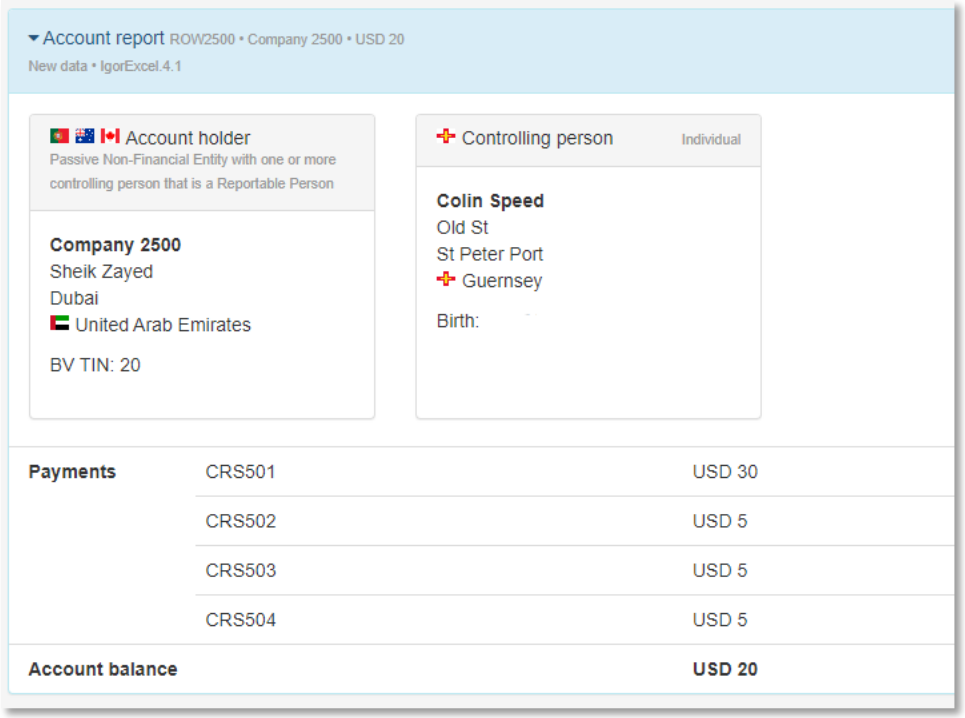
Clicking on a successful report will display a summary of the report.



Clicking on View Details will allow you to drill down into further information.



Clicking on the Account Report will show detail of that item.

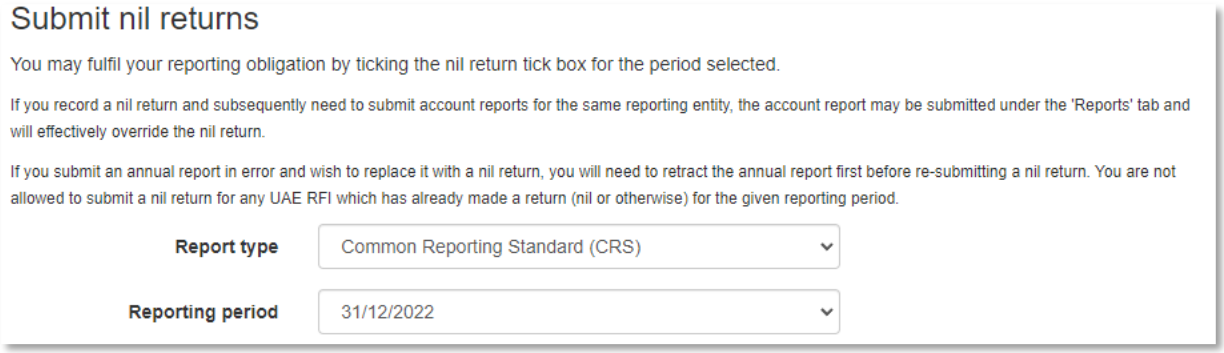


Warnings

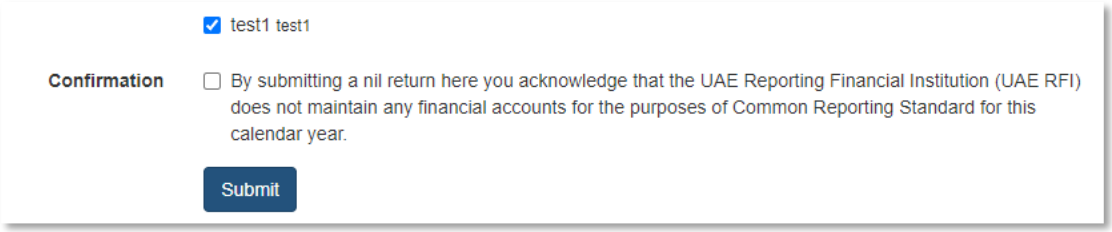
The system includes TIN Validation for the TIN numbers used by all jurisdictions. An incorrect TIN may generate a warning which will appear on the screen. This will not prohibit you from submitting the report, but the Regulatory Authority will also see the warnings and may require them to be corrected.

2.5 Nil Returns

If you are a Reporting Financial Institution that does not maintain financial accounts for the purposes of FATCA and/or CRS (for the reporting year CY2022), you are required to submit a nil return.
This is a simple process and the screen looks as follows:



Select the Financial Institution you wish to make the Nil Return for. If you wish to make a Nil Return for an FI where a report has already been successfully submitted, you need to Retract that report first.
You will be asked to agree to the Confirmation by clicking the check box.


test1 test1
Confirmation
By submitting a nil return here you acknowledge that the UAE Reporting Financial Institution (UAE RFI) does not maintain any financial accounts for the purposes of Common Reporting Standard for this calendar year.
Submit

3 Risk Assessment

Scenario: How do I complete the FATCA/CRS Risk Assessment Questionnaire?

3.1 Who is required to complete the FATCA/CRS Risk Assessment Questionnaire?

All UAE Reporting Financial Institutions ("UAE RFIs") registered on the FATCA/CRS System for that Reporting Year are required to complete a Risk Assessment Questionnaire by the stipulated deadline for each Compliance Type (i.e., FATCA and/or CRS).

If a UAE RFI reports to more than one UAE Regulatory Authority ("RA"), it will be required to complete and submit a separate Risk Assessment Questionnaire (within the respective 'Groups') for FATCA and/or CRS, as applicable to the UAE RFI.

UAE RFIs that do not have FATCA and/or CRS reporting obligations for that Reporting Year (e.g. CY2022) do not need to complete the FATCA and CRS Risk Assessment Questionnaires, as applicable.

3.2 Who can complete the FATCA/CRS Risk Assessment Questionnaire?

The FATCA and CRS Risk Assessment Questionnaires should be completed by an Administrator, Maker or Maker+Checker user in each Group. This is the 'Maker' Action.

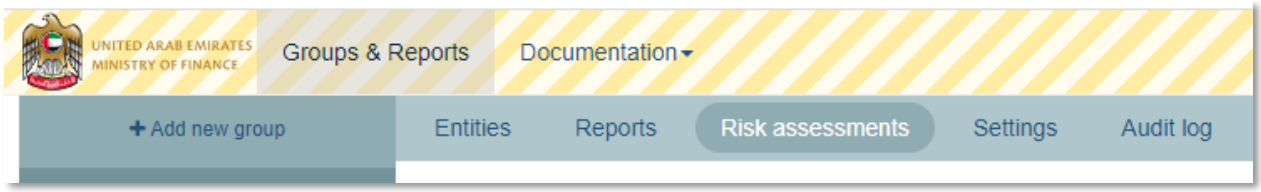
Subsequently, a different Administrator, Checker or Maker+Checker user must 'check' the questionnaire and 'Accept' or 'Reject' the questionnaire. This is the 'Checker' action.

Please note that a user cannot perform the 'Maker' and 'Checker' action. i.e., different users are required to perform the different actions.

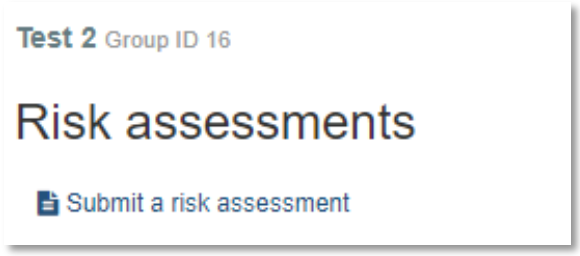
3.3 Completing the FATCA/CRS Risk Assessment Questionnaire

Select the Group from the left-hand bar.

The following menu will be displayed.



Select “Risk Assessments” > “Submit a risk assessment”



The Submit risk assessment page will be displayed.

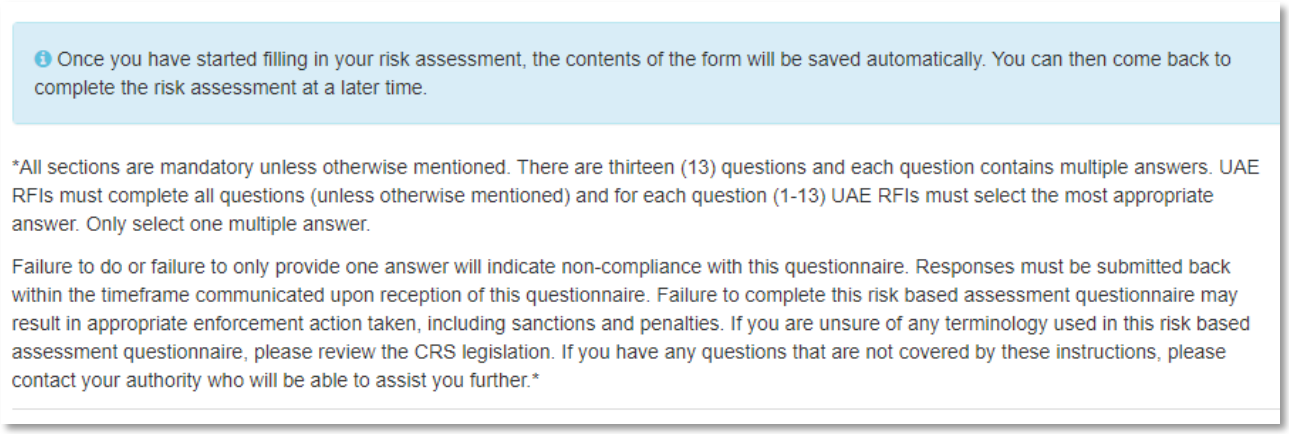
Select the relevant “Report type”: CRS or FATCA

Select the relevant “Reporting period”.

You may then begin completion of the questionnaire.

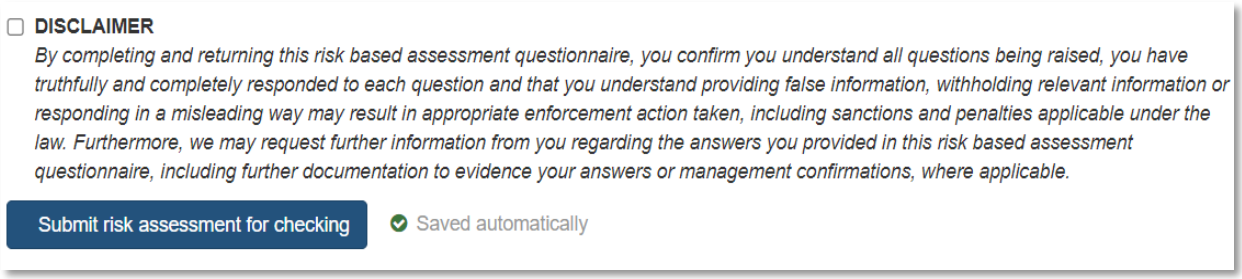
Please note that the questionnaire may be partially completed if required, as it will automatically be saved after a few seconds of entering the data. Please check the status at the bottom of the form.

The instructions to complete the questionnaire are provided at the top, once the questionnaire loads on the page. Please ensure to read all the instructions and follow them carefully.



When completing the questionnaire, carefully read the questions and the responses available, selecting the most appropriate answer for each question. Please note that only one response may be selected for each question.

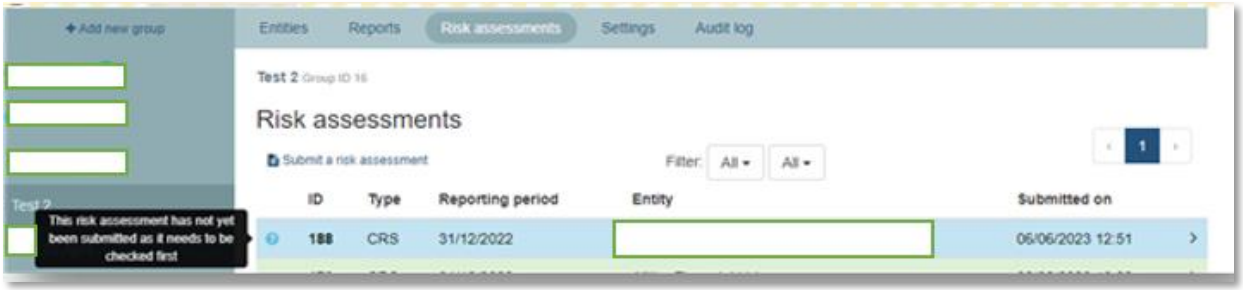
Once completed, the questionnaire must be submitted for ‘Checking’ by selecting "Submit risk assessment for checking". Please read the disclaimer and ensure the most appropriate response has been selected for each question.



3.3.1 Checking

Once a FATCA/CRS Risk Assessment Questionnaire has been completed and submitted by the Maker (or Admin user) for ‘checking’, all Checker users in the Group will be notified via mail notification.

The following screen will appear after the Checker logs in and navigates to the ‘Risk assessments’ tab.

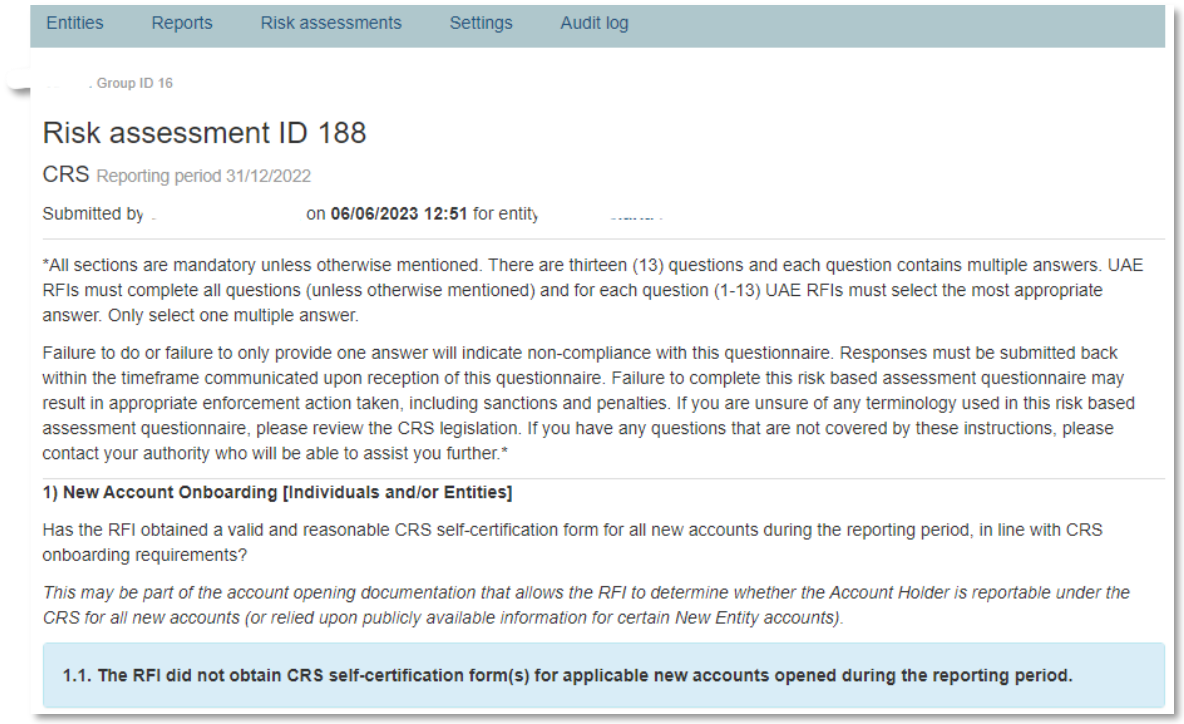


Each FATCA/CRS Risk Assessment questionnaire submitted by a UAE RFI for 'checking' will appear in the Checker user's list, highlighted in blue.

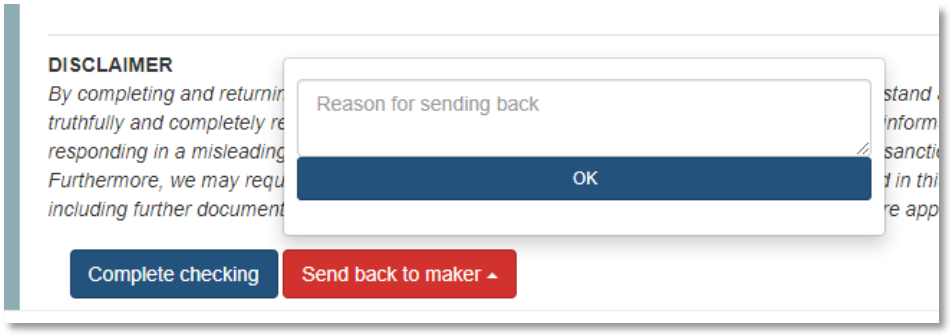
Hovering over the row will also display the status of the questionnaire (e.g., The risk assessment has not yet been submitted as it needs to be checked first.').

Please note that the FATCA and CRS risk assessment questionnaires will appear as separate line items in the Checker's view. This may be reviewed in the column 'Type'.

Clicking on each UAE RFI's submitted questionnaire (for FATCA or CRS), displays the questionnaire submitted by the Maker. The selected answers are highlighted in blue (as shown below).



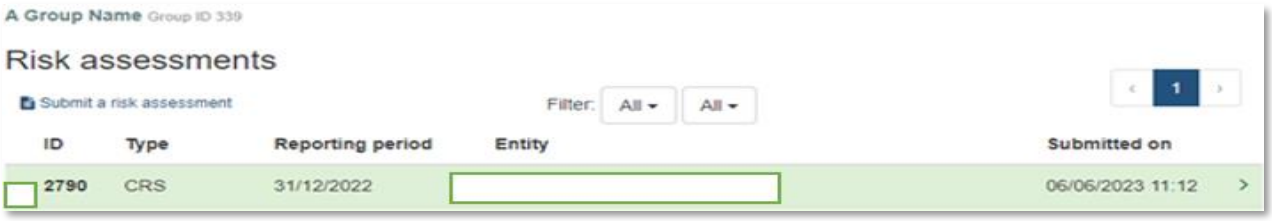
The Checker user is required to review the responses provided and either accept the submission by clicking "Complete Checking" or reject the submission by clicking on "Send back to maker". Where a Checker user rejects the questionnaire, a reason must be provided to the Maker user, as shown below.



3.3.2 Complete Checking

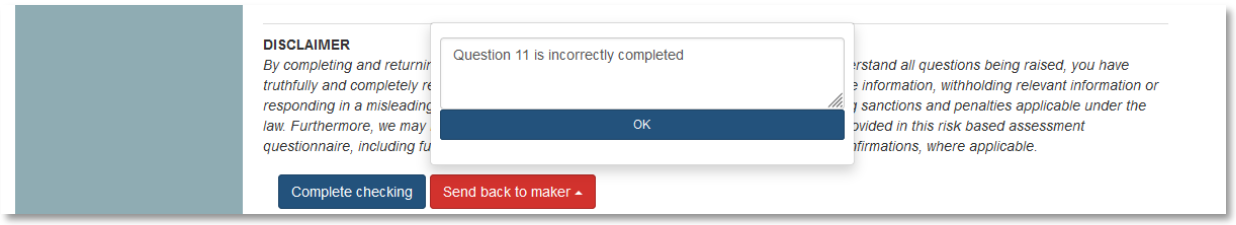
Clicking the "Complete checking" button will forward the FATCA/CRS Risk Assessment Questionnaire to the respective RA.

Once the Risk Assessment questionnaire is submitted to the RA for review, the UAE RFI name with the 'Type' (FATCA or CRS) will appear in Green to indicate that it was successfully submitted.

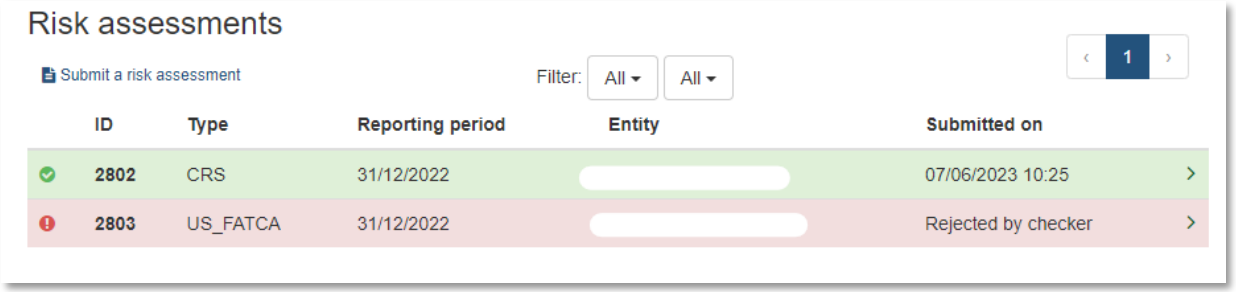


3.3.3 Send Bank to Maker

A Checker User may send the FATCA/CRS risk assessment questionnaire back to the Maker user, in case a question has been incorrectly answered by indicating the 'Reason for Sending Back' as shown in the example below:

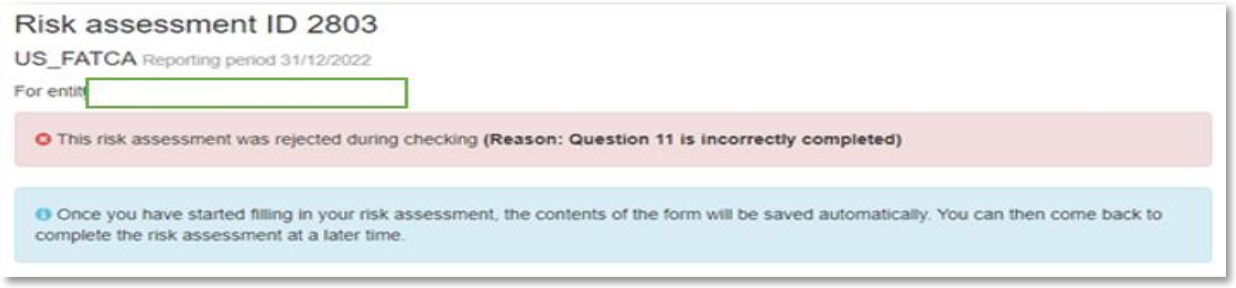


On the maker screen, the Risk Assessment will be classified as "Rejected by checker" in the Risk Assessment page.



When the Maker user opens the questionnaire,

the submitted questionnaire is displayed with the comments shown at the top of the screen (as below):



At this stage, the Maker user is required to incorporate the required changes to the questionnaire and re-submit it to the Checker user for review.

It is important to note that a FATCA/CRS risk assessment questionnaire submission is not considered complete until the Checker user has clicked 'Complete checking', upon which the questionnaire is submitted to the RA for review.

The FATCA/CRS system does not accept late filings of the Risk Assessment questionnaires. If the risk assessment questionnaire for each Reporting type (FATCA and/or CRS) is not submitted by the stipulated deadline, the UAE RFI may be subject to penalties and sanctions by the RA.

4 Corrections

This section outlines the "Corrections on request" functionality within the UAE Ministry of Finance FATCA / CRS System ("System").

Corrections to previously submitted FATCA or CRS files may be required for FATCA and CRS, respectively if requested by the UAE Ministry of Finance or the UAE Regulatory Authority.

If the data submitted by Reporting Financial Institutions (RFIs) requires a correction, the RFI(s) will be notified via email notification and must act upon this notification within the stipulated deadline within the notification or alternatively by the UAE Ministry of Finance or the UAE Regulatory Authority.

The System is used to review the corrections required and to submit the corrected data back into the System.

It is important to note that:

- RFIs must only make corrections where requested;
- RFIs are required to submit a corrections template, even if there are no records that the RFIs are correcting or voiding.
- Editing rows and/or columns will result in failure to upload the corrections file; and
- Attempting to add additional data (accounts) will result in failure to upload the corrections file.

This document will detail the process of viewing the FATCA/CRS data where a correction is required by the RFI, downloading the document which contains the detail of the corrections to be made and how to submit the corrected data and file back into the System.

Guidance on how to access the FATCA CRS system, Registration, Data Submission can be found here: Automatic Exchange of Information – FATCA and CRS – Ministry of Finance – United Arab Emirates (mof.gov.ae)

4.1 Preparing Corrections file

RFIs that are required to correct their FATCA and/or CRS data will be notified via an email notification.

Upon logging into the System, the RFI must navigate to the "*Reports*" tab. All RFI users (RFI Maker, RFI Checker, etc.) can identify the report that requires correction as this

report will be highlighted in purple (as shown below in Figure 1), indicating that corrections are required to data that was submitted in that report.

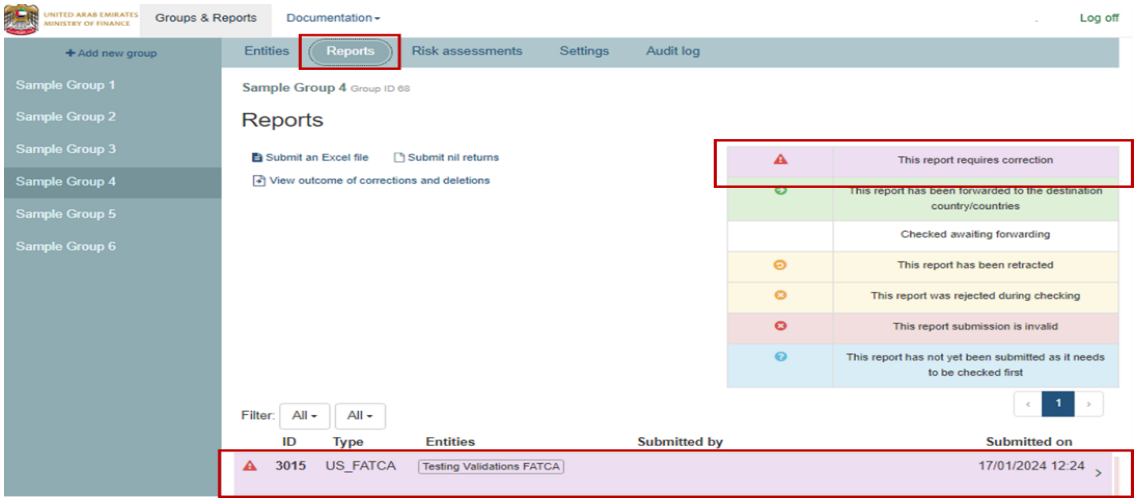


Figure 1

By double clicking the purple report row (as shown in the red box at the bottom of the screen in Figure 1), the next screen shows "*Summary*" and "*XML*" view. (as shown below in Figure 2)

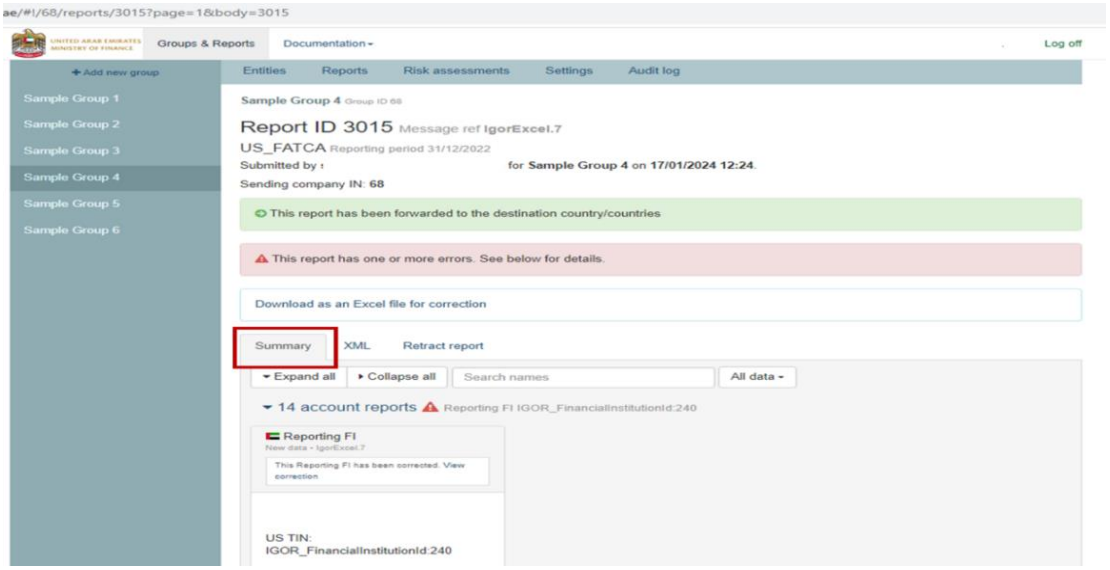


Figure 2

RFI user can view the account records that require correction in the "*Summary*" tab (as indicated in the red box in Figure 2 above), as these are highlighted in red (see below in Figure 3).

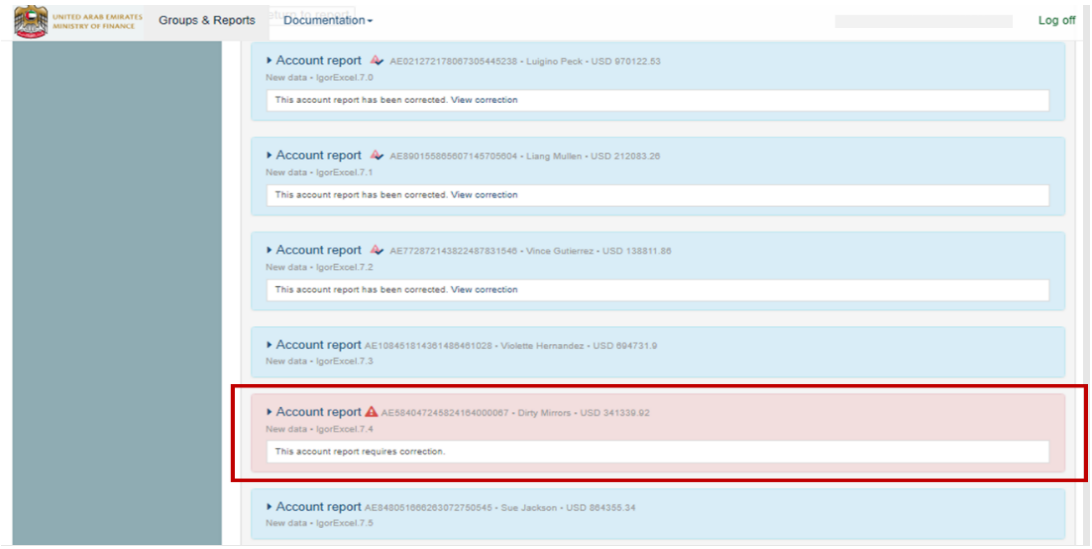


Figure 3

4.1.1 Corrections Excel Template

The System only accepts corrections to be submitted in the Excel file format.

The corrections template can be downloaded by clicking the "*Download as an Excel file for correction*" hyperlink (as indicated in the red box in Figure 4 below).

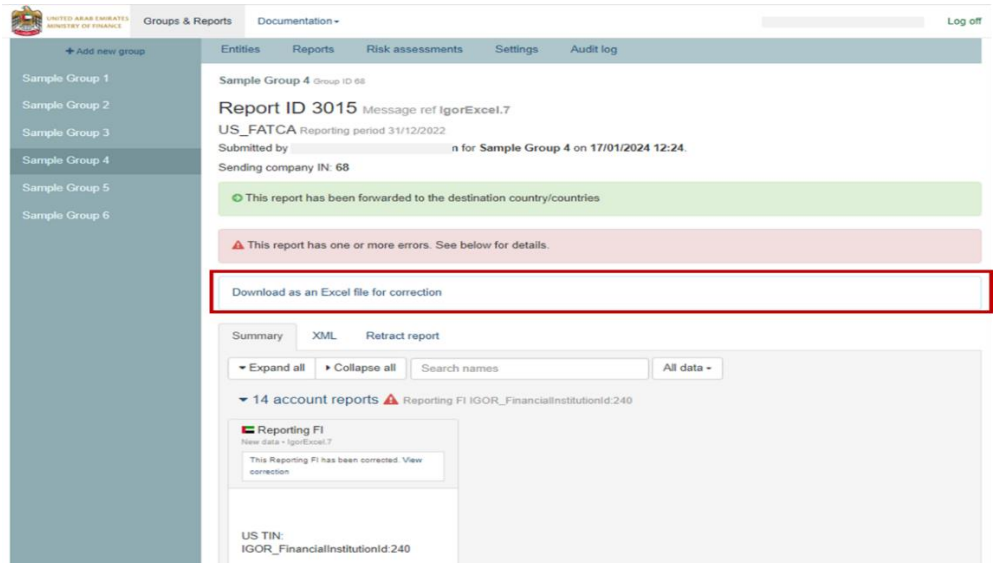


Figure 4

Upon clicking the hyperlink, the RFI user will be able to download the corrections excel template (CRS or FATCA, depending upon the report that requires Corrections).

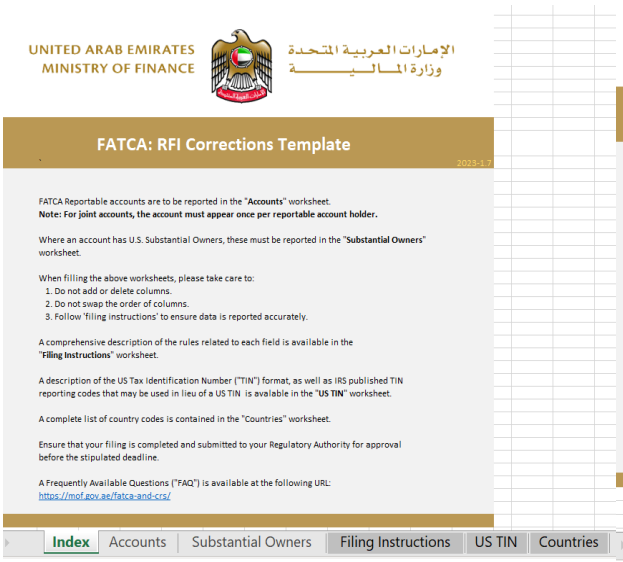


Figure 5

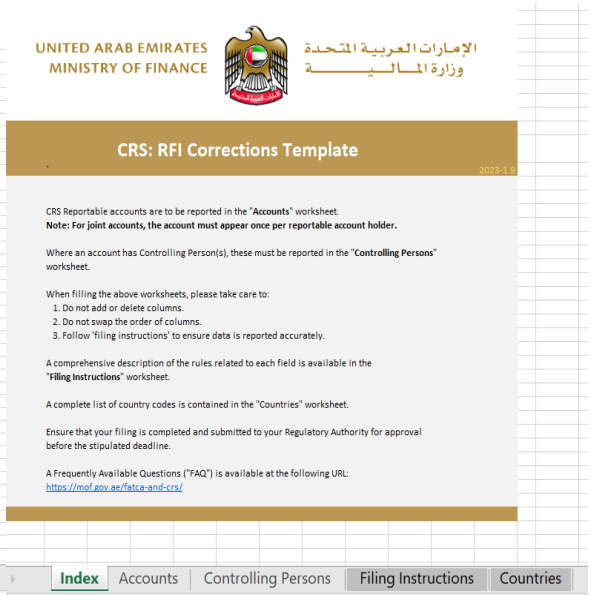


Figure 6

The excel template is pre-populated with the rows that require correction in the "*Accounts*" tab. The excel templates contain the following tabs:

FATCA: (as shown in Figure 5 above)

- Index;
- Accounts;
- Substantial Owners;
- Filing Instructions;
- US TIN formats; and
- Countries

CRS: (as shown in Figure 6 above)

- Index;
- Accounts;
- Controlling Persons;
- Filing Instructions; and
- Countries.

In the "*Accounts*" tab, towards the right of the sheet, there are columns which are required to be completed for corrections (as shown in Figure 7 below):

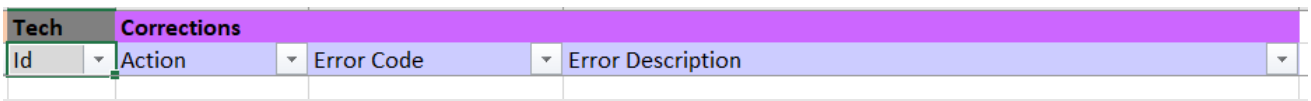


Figure 7

Please see below further information on each column:

- **Id:** The column contains the "DocRefID" of the record that needs to be corrected. This is system generated and must not be altered by the user.
- **Action:** Below are the actions that the RFI user needs to complete:
    - If the RFI user is performing an action for the record that has been requested to be corrected, the RFI user needs to specify the action to be taken for the corrected record by entering the text of either "*Correct*" or "*Void*" (any other entry would be invalid and the file will not be accepted).
        - *Correct*: for updating certain field(s) in the record for which a correction was requested; or
        - *Void*: for deleting the record for which a correction was requested
            - (note: you are required to provide documentary evidence to your Regulatory Authority evidencing the record can be made void).
    - <u>If the RFI user has no action to be taken for the record that has been requested to be corrected, the RFI user can leave this field blank.</u>

- **Error Code:** Generated by the system for reference based on CRS / FATCA error codes. No action needed by RFI user.
- **Error Description:** Generated by the system for RFI user to specify the error, so that correction action can be taken on the specified field. No action needed by the RFI user.

RFIs must only correct the data that is requested for.

Changing rows, columns or adding additional data will result in failure to upload corrections file.

4.2 Submitting Corrections

4.2.1 Corrections File Upload

Once the corrections template has been prepared as per the steps described in Chapter 2 above, below is the process for the RFI to upload the corrections file.

Click on Reports and select Submit an Excel File (as indicated in the red boxes in Figure 8 below).

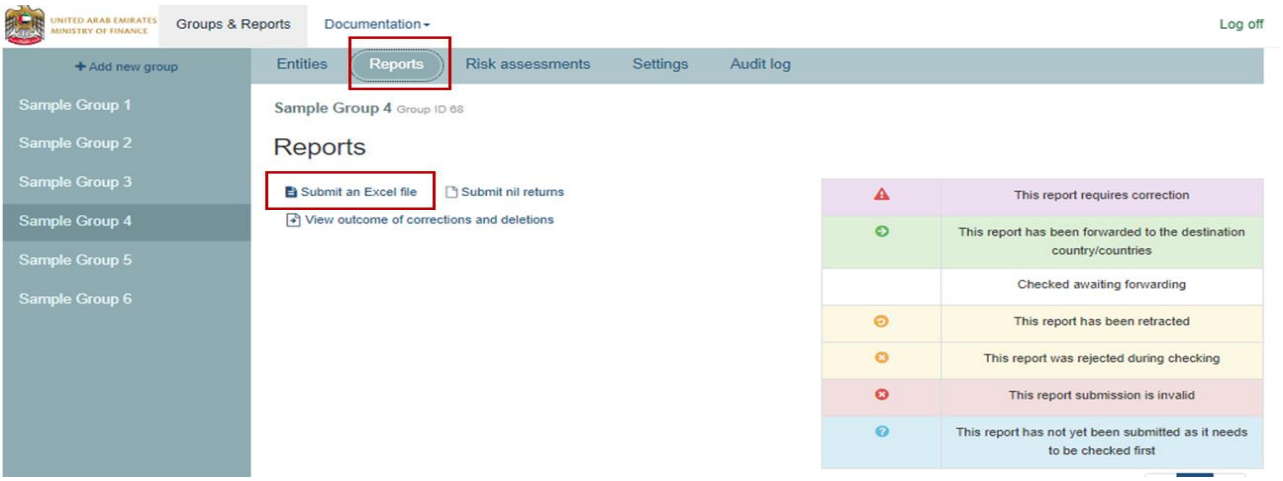


Figure 8

Select the compliance type that requires corrections e.g. FATCA or CRS from the drop-down menu (as indicated in the red box in Figure 9 below) and the Reporting period. The screen will list all the Financial Institutions under the group. Select the Financial Institution for which corrections are required.

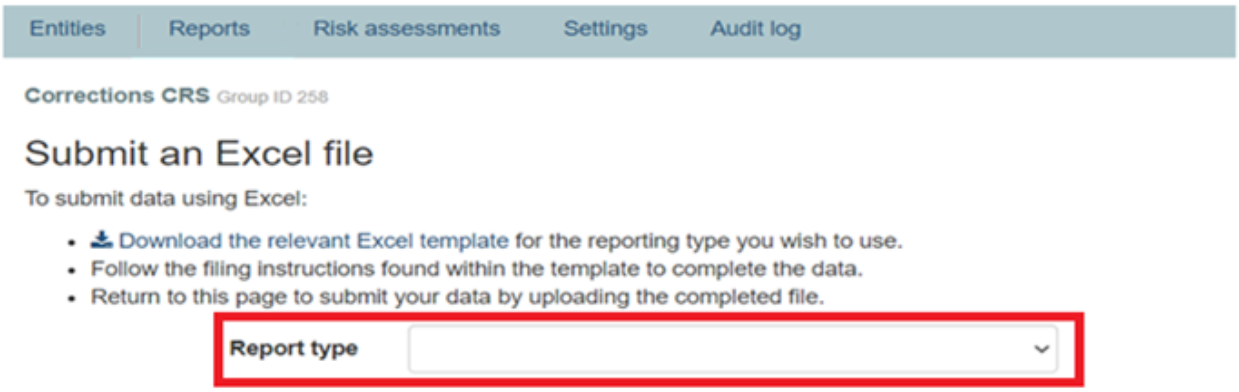


Figure 9

Click on Browse (as indicated in the red box in Figure 10 below) to upload the excel corrections file, then click on submit. Once submitted, an email will be sent, notifying the RFI checker within your group that a corrections file has been uploaded and needs to be checked.

Figure 10

The RFI Checker user can either ***Accept*** the file or ***Reject*** the file (as indicated in the red box in Figure 11 below).

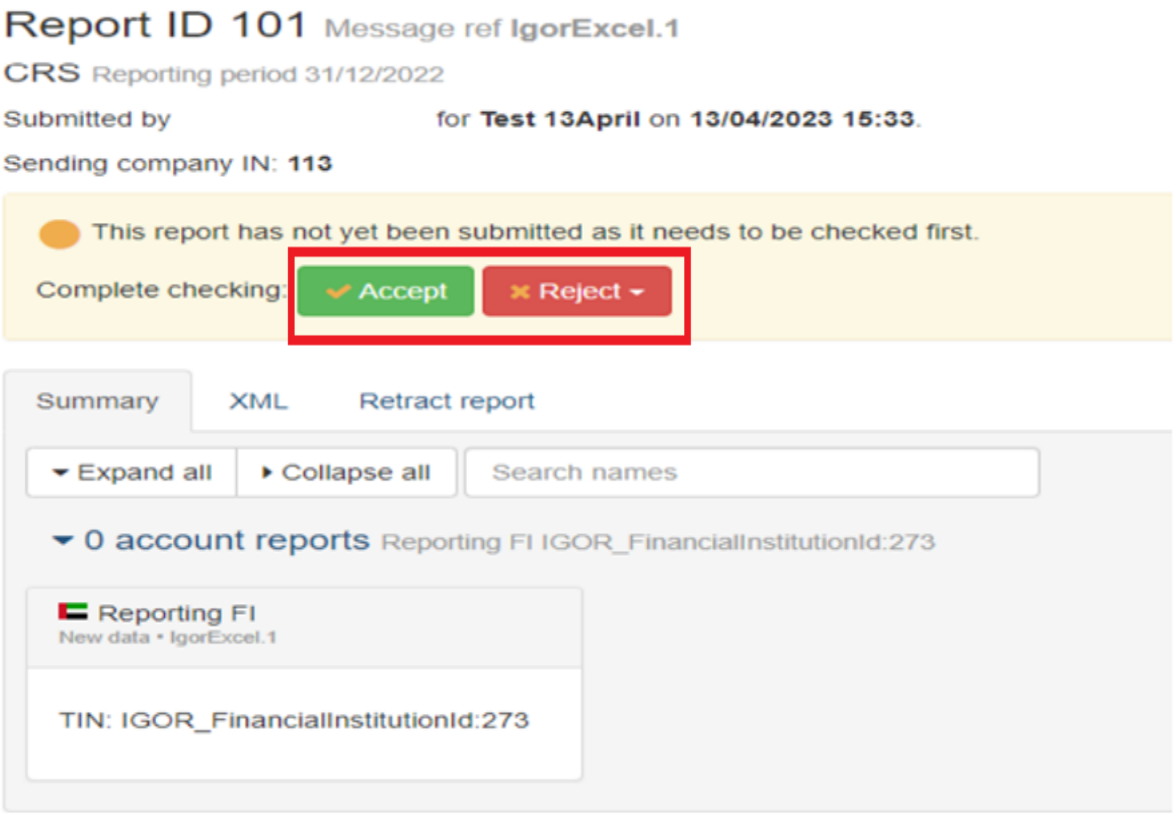


Figure 11

If the RFI Checker rejects the report, the RFI Checker will need to provide a reason for rejection. (Click on the Reject button again if you wish to unselect 'Reject').

Accepting will submit the report in the system and will complete the action from the RFI's end and the below screen will appear (as shown in Figure 12 below).

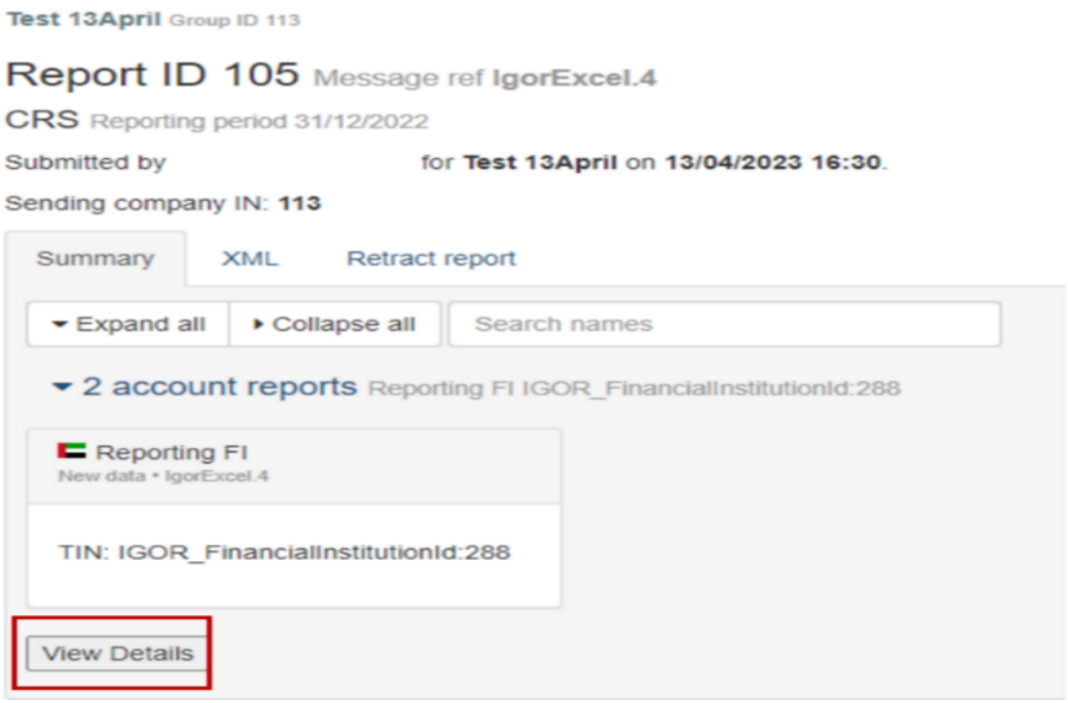


Figure 12

Clicking on View Details (as indicated in the red box in Figure 12 above) will allow you to drill down into further information (as shown in Figure 13 below).

Figure 13

Clicking on the ***Account Report*** (as indicated in the red box in Figure 14 below) will show the Account details of the record.

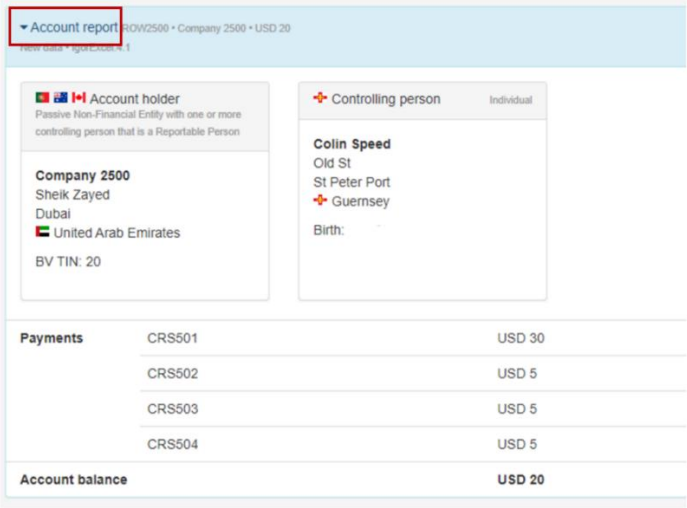


Figure 14

This completes the actions required from the RFI.

For further information on FATCA / CRS System, please refer the UAE Ministry of Finance website FATCA / CRS section - https://mof.gov.ae/fatca-and-crs/

5 FATCA / CRS Schema Documentation

FATCA Schema: USA's IRS document

CRS Schema: OECD document

A limitation of the FATCA and CRS user guides is that they define the intended use of the
schemas when exchanging information internationally (i.e., FIs or Tax Authorities sending
information to a foreign Tax Authority). However, they make only loose recommendations regarding the usage of the schemas for 'domestic' reporting, i.e., an FI reporting information to their local Tax Authority.

5.1.1 Basic requirements of a valid message

Authentication

A message can be submitted to ITIES either by logging in and selecting an Organisation to report for in the web user interface, or by using a web service call and an Organisation API key.

For FATCA reporting, in order for ITIES to verify that the user is authorised to transmit the message, every ReportingFI must have exactly one IN element with issuedBy="US" which must contain a valid GIIN which is one of the Organisation's authorised FIs, otherwise the entire message is rejected.

For CRS reporting, if a GIIN is priovided it is treated as for FATCA; if no GIIN is provided then the ReportingFI is authenticated by name: the name in the Name element must match exactly with the name registered with ITIES.

The SendingCompanyIN in the MessageSpec element must be either an ITIES organisation ID (recommended), or a a valid GIIN which is one of the Organisation's authorised FIs.

For FATCA reporting, the element containing the GIIN of the ReportingFI is called TIN instead of IN. ITIES will treat a TIN as a GIIN if the issuedBy attributed is either "US" or omitted, but for consistency with CRS the issuedBy attribute should be specified with the value "US".

Sponsored entities

The IRS has not yet established a registration process to allow sponsored entities to have their own GIINs. If the ReportingFI is a FATCA sponsored entity then the TIN element of the ReportingFI should contain the GIIN of the *sponsoring entity*. This approach is analogous to that proposed in the FATCA FAQ on Sponsoring/Sponsored Entities.

The GIIN of the Sponsor element itself is not authenticated by ITIES.

XSD Validation

All messages submitted under FATCA or CRS are validated first against the relevant FATCA or CRS schema definition (XSD) files. Note this means that some elements or attributes which are ignored by ITIES are still mandatory if required by the relevant XSD. In the commentary below, recommended values are provided for such fields.

XML Comments

XML comments may be included in messages. XML comments are removed by ITIES before the message is stored, and are therefore not visible to the NBR or the destination country.

Encoding

All XML messages submitted to ITIES must be **valid** (see http://www.w3.org/TR/RECxml/#dt-valid) and should be UTF-8 encoded. Other encodings may be used, but are not guaranteed to be handled correctly by ITIES.

XML Element Usage

The outline of the CRS schema is shown below, showing the elements which are relevant
to this document:

MessageSpec element

The sub elements of the MessageSpec element are only used by ITIES for message processing. Apart from the ReportingPeriod, none of the information is forwarded to the destination country.

SendingCompanyIN

The SendingCompanyIN must be either an ITIES organisation ID (recommended), or the GIIN of an FI which has been registered within your ITIES Organisation. If using a GIIN it does not necessarily need to correspond to any of the reporting FIs or sponsors contained in the message, but the sender should chose the GIIN of the most 'obvious' main sponsor or lead FI.

The SendingCompanyIN has special significance if corrections are used (i.e. if you are using DocSpec elements to amend or void previously submitted data). The SendingCompanyIN of a message containing a correction must be the same as the SendingCompanyIN of the message being corrected.

TransmittingCountry and ReceivingCountry

The content of these fields is ignored for domestic reporting to ITIES. They must be provided in order to pass XSD validation, and it is recommended they should both contain "BH" (for Bahrain).

For CRS reporting, in order to avoid ambiguity, the ReceivingCountry must be BH.

Warning and Contact
These elements are ignored by ITIES and will not be forwarded to the destination country.

MessageRefId
This string uniquely identifies the message. It may contain any characters. ITIES will check that the MessageRefId is unique and will reject any message where it is the same as a previous MessageRefId successfully submitted by the same SendingCompanyIN. The string comparison used for this test is case insensitive, so MessageRefIds which differ only in letter case are considered to be the same.

MessageTypeIndic
This element appears in CRS only. If present, it is ignored by ITIES, and it should be omitted.
The CRS User Guide contains a requirement that 'messages must contain all new or all corrected data'. However, Bahrain FIs can ignore this requirement when reporting via ITIES. ITIES accepts messages for both CRS and FATCA which contain a mixture of new and corrected reports.

CorrMessageRefId
For FATCA reporting, this element is ignored by ITIES and should be omitted. When transmitting corrections under FATCA, the CorrMessageRefId under the DocSpec element should be used.

For CRS reporting the CorrMessageRefId must be omitted. CorrMessageRefId is not used for CRS corrections (CRS uses globally unique DocRefIds instead) and ITIES does not support the CRS convention of using the CorrMessageRefId to cancel a previous message.

MessageType and Timestamp
These must be provided in the form recommended by the FATCA and CRS specifications, although presently they are ignored by ITIES.

ReportingPeriod
This must be provided as recommended by the FATCA and CRS specifications. The ReportingPeriod is used by ITIES to determine whether to send messages to users to remind them to submit reports.
When a message contains a correction, the ReportingPeriod of the message must be the same as the ReportingPeriod of the message which contained the element being corrected. If not, ITIES will reject the message.

CrsBody/FATCA element
The details of how account, account holder and organisation information should be reported using the CRS and FATCA schema is outside the scope of this document,

except to say that these details are not processed by ITIES but are simply forwarded verbatim to the destination country.

Multiplicity of ReportingGroups
The CRS specification states on page 244 although in the schema this element is repeatable, for CRS only one ReportingGroup for each CrsBody is to be provided'.

For ITIES, this restriction is applied to both FATCA and CRS reporting. **Messages must contain exactly one ReportingGroup in each CrsBody (or FATCA) element.**

The rationale behind this restriction is that allowing multiple ReportingGroups would create significant ambiguity over how to interpret corrections, because it is not clear how newly added AccountReports should relate to previously provided Sponsor and Intermediary details for the same ReportingFI. Rather than attempt to resolve this ambiguity by creating a novel interpretation of the correction process which would have counter-intuitive behaviour in certain cases, we have opted to impose the same restriction to FATCA as exists in CRS.

ReportingGroup contents
Under CRS, the ReportingGroup element should only contain AccountReports. Therefore if a Sponsor, Intermediary or PoolReport is included in a CRS message, the message will be rejected.

Under the Model 1 IGA used for FATCA reporting, pooled reports are not permitted. Therefore if a PoolReport is included in a FATCA message, the message will be rejected.

DocSpec elements
ITIES processes DocSpec elements in order to handle corrections of reported data in accordance with the intended use of the CRS and FATCA specifications. The best available guidance on the correction process is in the CRS User guide starting on page 254.

The following notes on the parts of the DocSpec element provide some additional information about how ITIES handles corrections.

DocRefId
Every DocSpec element must have a DocRefId. It may contain any characters. ITIES will reject any messages with duplicate DocRefIds when the message is submitted.

For a CRS message, a DocRefId must never be reused by a given SendingCompanyIN.

For FATCA, the DocRefId need only be unique within the message.

As for MessageRefId, the string comparison used for this test is case insensitive, so DocRefIds which differ only in letter case are considered to be the same.

DocTypeIndic
ITIES does not recognise separate DocTypeIndics for live and test data. All DocTypeIndic elements, whether being submitted to a live or test ITIES Organisation, must use the following values:

New data: **OECD1/FATCA1**

- The CorrDocRefId and CorrMessageRefId must be omitted

Corrected Data: **OECD2/FATCA2/FATCA4**

- The CorrDocRefId must be specified (and CorrMessageRefId for FATCA)
- Note that ITIES interprets the codes FATCA2 and FATCA4 as the same, and will supply the correct code when reports are forwarded to the destination jurisdiction

Deletion of Data: **OECD3/FATCA3**

- The CorrDocRefId must be specified (and CorrMessageRefId for FATCA)

CorrDocRefId
The entire message will be rejected if any CorrDocRefId (or CorrMessageRefId and CorrDocRefId for FATCA) is not valid. A CorrDocRefId is not valid if:

- It does not correspond to a previously submitted element having a DocSpec with a corresponding DocRefId (or MessageRefId and DocRefId for FATCA)
- The corrected element has been deleted by an OECD3 (or FATCA3) report
- The type of the corrected element is not the same as type of the correction (e.g. the previous element was a Sponsor, but the correction is an Intermediary)
- The reporting period of the message containing the corrected element is not the same as the reporting period of message containing the correction
- The correction appears in a different body element from the corrected element (indicated by the CorrDocRefId of the ReportingFI)
- There is another correction within the same message which corrects the same previously submitted element

Correcting or deleting already-corrected elements
The CRS user guide states on page 254 that 'the CorrDocRefId [...] must always refer to
the latest reference of this AccountReport (DocRefId) that was sent'.

However, the FATCA user guide does not stipulate whether the CorrDocRefId of an element which is a correction or a deletion of an element which has already been

corrected should be the DocRefId of the original element or of the corrected element. For example, if new data is sent with DocRefId = A, and a correction is then sent with DocRefId = B and CorrDocRefId = A, should the CorrDocRefId of a further correction be A or B?

To resolve this ambuguity in FATCA, ITIES will accept a correction which has a CorrDocRefId equal to *any* DocRefId from the chain of corrections of the element when receiving either CRS or FATCA reports. We recommend that senders should follow the CRS requirement and use the latest DocRefId if this can be achieved without additional implementation complexity.

Once an element has been deleted, any message containing a further request to correct or delete the element will cause the whole message to be rejected.

Treatment of ReportingFIs when correcting AccountReports
Each ReportingGroup may contain multiple AccountReports and for FATCA may optionally contain a Sponsor and/or an Intermediary. These are all correctable elements having a DocSpec. However, while the CRS and FATCA user guides give clear guidance on how these elements are to be corrected, there is some ambiguity about what should be provided in the ReportingFI which corresponds to the correction, which is a mandatory element in the containing CrsBody (or FATCA) body element.

The ITIES implementation of the correction process requires that if any body element contains a correction or deletion, then the ReportingFI of that body element must be a correction of the same ReportingFI element which was in the body element containing the original element. The ReportingFI element must therefore also contain a repeat of the information contained in the original element.

For example, if an original message contains this information:
CrsBody

- ReportingFI A
- ReportingGroup
    - AccountReport A1
    - AccountReport A2

CrsBody

- ReportingFI B
- ReportingGroup
    - AccountReport B1

Then a correction to AccountReport A1 should look like this:
CrsBody

- ReportingFI A_c1 (CorrRefID = A)

- ReportingGroup
    - AccountReport A1_c1 (CorrRefID = A1)

Note it is not necessary to repeat AccountReport A2 or the CrsBody containing ReportingFI B; those details will remain unaltered.

When deleting a ReportingFI, it is however necessary to also delete all current AccountReports (and for FATCA, also any Sponsor or Intermediary) within the same body.

6 Help and Support

For questions and enquiries, kindly contact 800533336 or email info@mof.gov.ae

For issues related to UAE PASS please see the following UAE Pass User Guide https://icp.gov.ae/en/uae-pass/