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

[Help and Support](#)

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# Login and 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 system.
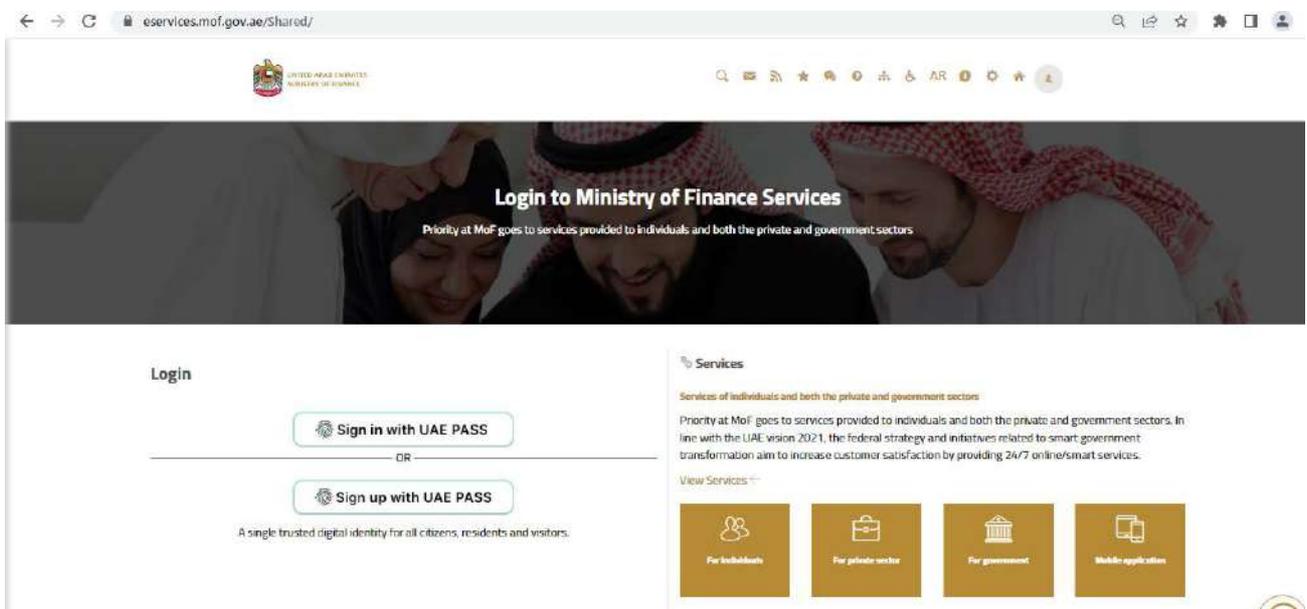
# 1. Register as a user of the system

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.

**Add group**

Use groups to group your entities.

After you have created an group, you may add entities to it.

| **Group name** | Group name |
|---|---|

**Additional users**

You will be an administrator of this group.

- **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.

You must add at least one other user to this group in addition to yourself.

To create a Group, give it a name. Any name that describes the group.

To create additional Groups, click on **+Add new group**

# 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 organisation 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 organisation once they have confirmed their email address.
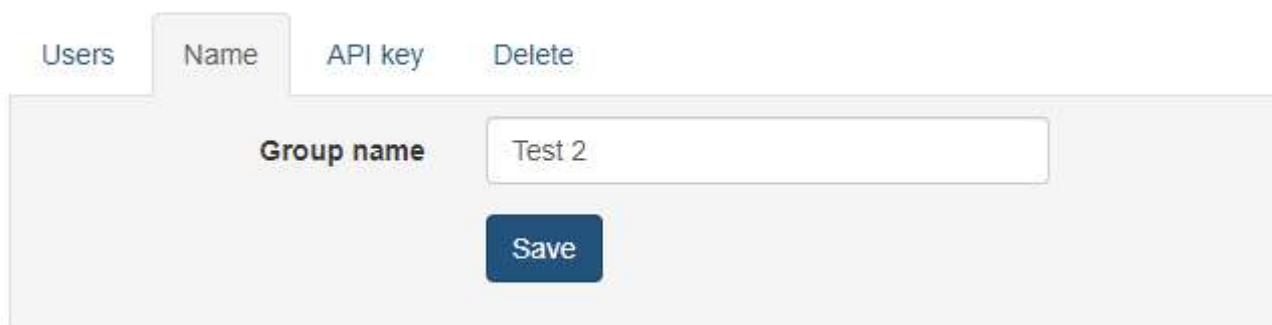
To remove a user:

- 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.
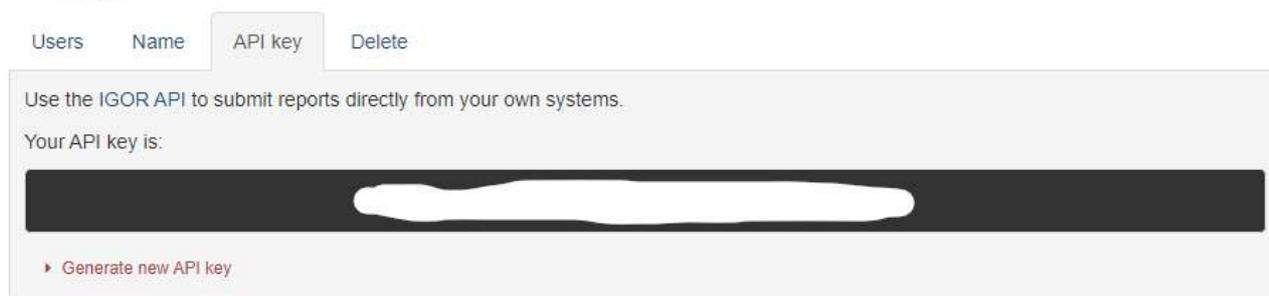


## API Key

Under **API** tab your will find the API key for your Organisation. 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.

## Settings

| Users | Name | API key | Delete |
|-------|------|---------|--------|

You may delete groups which have no reports awaiting forwarding.

▾ Delete this group



**Deleting an group is permanent and cannot be reversed.**

This group has no reports awaiting forwarding and so can be deleted.

☐ I wish to delete Test 2

**Delete**

A message will be provided if it cannot be deleted.

## Settings

| Users | Name | API key | Delete |
|-------|------|---------|--------|



**You cannot delete this group as it has submitted reports which have not yet been forwarded to the destination country.**

To delete this group, first retract any reports which have not yet been forwarded.

# RFI Registration process

## Add one or more financial institutions within a Group

Click on **+ Add new Entity**

## Add entity

You will not be able to take any actions for this entity until it has been authorised by your Regulatory Authority.

| Type of reports this institution will submit | Classification<br>This should match the legal classification or be the item that covers the greatest part of the business. | Reportable from |
|---|---|---|
| ☑ Common Reporting Standard | Depository Institution ⌄ | YYYY-MM-DD 📅<br>Date became RFI |
| ☑ Foreign Account Tax Compliance Act | Custodial Institution ⌄ | YYYY-MM-DD 📅<br>IRS Registration Date |

**Regulated by**
- ○ **Central Bank of the UAE (CBUAE)**
- ○ **Dubai International Financial Center (DIFC)**
- ○ **Securities and Commodities Authority (SCA)**
- ○ **Abu Dhabi Global Market (ADGM)**
- ○ **Non-financial regulated**

If you are required to report this entity to more than one Regulatory Authority, you must create a new Group for each Regulatory Authority. E.g., should the entity be required to report to Central Bank of the UAE, DIFC and SCA, then you must create three (3) Groups, one for each Regulatory Authority

**GIIN (required for US_FATCA)**  🔍 Search by GIIN or name

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

**Name**  Name

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 above.

[ Save ]

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.

## Test CRS - Registration Details

| Name | Test CRS |
| --- | --- |
| Date of incorporation | YYYY-MM-DD |
| Country of incorporation | United Arab Emirates (AE) |

### Contact details

| Business address country | |
| --- | --- |
| Contact first name | Contact first name |
| Contact last name | Contact last name |
| Telephone | 🇦🇪 ▼ 050 123 4567 |
| Business address | Business address |

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.

**Licence**

| | |
|---|---|
| Licensing authority | [dropdown] |
| Trade licence number | [input field] |
| Trade license | Browse... |
| Regulatory license | Browse... |
| Other documents You may upload additional documents in support of your registration. | Browse... |

Files must have a .pdf, .jpeg or .jpg extension and be no larger than 20Mb.

**Save registration**

Please select the Licencing Authority from the drop-down list together with the Trade Licence number.

You will need to add a copy of your Trade Licence and Regulatory Licence. 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 licence and Regulatory licence, but will not be able to submit the Registration to the Regulatory Authority for authorisation 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.

Before you can submit reports for this financial institution, you will first need to submit it to CBUAE for authorisation.

**Submit for authorisation**

**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

When you have checked the details above financial institution, please click the button below to send it to CBUAE for authorisation.

**Complete checking**

You will be unable to submit reports for a newly added financial institution until it has been authorised 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.

### Entities awaiting checking

These entities have been submitted but are awaiting checking.

| Name | External ID | Period | CRS | US_FATCA | |
|------|-------------|--------|-----|----------|---|
| **Test 5** | Test 5 | 2022-12-31 | ● | | > |

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

| Reporting types | Classification<br>This should match the legal classification or be the item that covers the greatest part of the business. | Reporting periods |
|-----------------|------------------------|-------------------|
| Common Reporting Standard | Depository Institution<br>Change ▾ | 2022-12-31 🗑 |
| Foreign Account Tax Compliance Act | | None registered.<br><br>US_FATCA reporting periods cannot be added to this financial institution<br><br>because it does not have an external ID which is a GIIN. |

When you have checked the details above financial institution, please click the button below to send it to CBUAE for authorisation.

**Complete checking**

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

Once the Entity has been authorised, you will receive a message, the information will appear under the Authorised 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.

# 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.

**Test 13April** Group ID 113

## Audit log

| Date/Time | Entity | Submission | Action | User |
|---|---|---|---|---|
| 14/04/2023 08:18 | test for checker email | Registration | Submit | |
| 13/04/2023 14:43 | Test John | Registration | Submit | |
| 13/04/2023 14:46 | Test John | Registration | SubmissionCheck | |
| 13/04/2023 14:57 | Test John | Registration | Authorise | |
| 13/04/2023 14:58 | Test John | Registration | AuthorisationCheck | |
| 13/04/2023 14:54 | Test emails | Registration | SubmissionCheck | |
| 13/04/2023 12:28 | Test emails | Registration | Submit | |
| 13/04/2023 12:11 | Test 13April FI | Registration | Submit | |
| 13/04/2023 12:21 | Test 13April FI | Registration | SubmissionCheck | |
| 13/04/2023 12:23 | Test 13April FI | Registration | Authorise | |
| 13/04/2023 12:23 | Test 13April FI | Registration | AuthorisationCheck | |
| 13/04/2023 16:31 | Test John | Report 105 | SubmissionCheck | |
| 13/04/2023 15:39 | Test emails | Report 101 | SubmissionCheck | |
| 13/04/2023 15:01 | Test 13April FI | Report 100 | SubmissionCheck | |

# 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:

### Entities awaiting checking

These entities have been submitted but are awaiting checking.

| Name | External ID | Period | CRS | |
|---|---|---|---|---|
| **test for checker email** | test for checker email | 2022-12-31 | ● | › |

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 user guide.

# Data Submission (Annual / Nil Reporting)

## 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



## Submitting a Report

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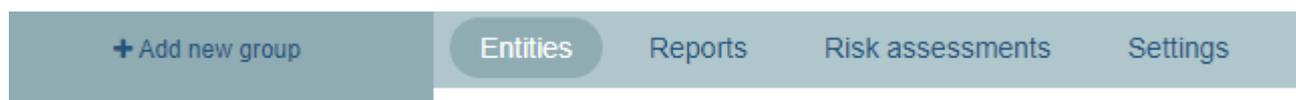


Select Reports

You are provided with 3 options.

## Reports

📄 Submit an Excel file     📄 Submit a report

📄 Submit nil returns

No entities in this group have submitted reports.

# 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.

## Submit an Excel file

To submit data using Excel:

- ⬇ Download the relevant Excel template for the reporting type you wish to use.
- Follow the filing instructions found within the template to complete the data.
- Return to this page to submit your data by uploading the completed file.

**Report type**    [                                              ⌄]

## Excel Templates

- Download the CRS Excel template
- Download the FATCA Excel template

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.

# 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

## Submit an Excel file

To submit data using Excel:

- ⬇ Download the relevant Excel template for the reporting type you wish to use.
- Follow the filing instructions found within the template to complete the data.
- Return to this page to submit your data by uploading the completed file.

| | |
|---|---|
| **Report type** | Common Reporting Standard (CRS) ⌄ |
| **Reporting period** | 31/12/2022 ⌄ |
| **Financial Institutions** | 🔍 Search by GIIN or name |

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.

Test 2 Group ID 16

# Report ID 21

CRS Reporting period 31/12/2022

Submitted by                    for **Test 2** on **29/03/2023 21:38**.

## The report document is invalid

Download errors as a CSV file

❌ **'Is Undocumented?' value 'Yes' is invalid (must be TRUE or FALSE)**
Cell 'Accounts'!E3

❌ **'Is Closed?' value 'No' is invalid (must be TRUE or FALSE)**
Cell 'Accounts'!F3

❌ **'Is Dormant?' value 'No' is invalid (must be TRUE or FALSE)**
Cell 'Accounts'!G3

❌ **Address city is required**
Cell 'Accounts'!P3

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

## Report submitted successfully

Report ID 101

**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:

**Test 13April** Group ID 113

# Report ID 101 Message ref **IgorExcel.1**

CRS Reporting period 31/12/2022

Submitted by                    for **Test 13April** on **13/04/2023 15:33**.

Sending company IN: **113**

🟠  This report has not yet been submitted as it needs to be checked first.

Complete checking:  ✔ Accept    ✖ Reject ▾

| Summary | XML | Retract report |

▾ Expand all    ▸ Collapse all    Search names

▾ **0 account reports** Reporting FI IGOR_FinancialInstitutionId:273

🇦🇪 Reporting FI
New data • IgorExcel.1

TIN: IGOR_FinancialInstitutionId:273

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.

**Test 13April** Group ID 113

# Report ID 105 Message ref **IgorExcel.4**

CRS Reporting period 31/12/2022

Submitted by                    for **Test 13April** on **13/04/2023 16:30**.

Sending company IN: **113**

| Summary | XML | Retract report |

▼ Expand all    ▶ Collapse all    | Search names |

▼ **2 account reports** Reporting FI IGOR_FinancialInstitutionId:288

🇦🇪 Reporting FI
New data • IgorExcel.4

TIN: IGOR_FinancialInstitutionId:288

View Details

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

▶ Account report IBAN AE6202114596512898868933 • Three trois • USD 20
New data • IgorExcel.4.0

▶ Account report ROW2500 • Company 2500 • USD 20
New data • IgorExcel.4.1

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

▼ **Account report** ROW2500 • Company 2500 • USD 20
New data • IgorExcel.4.1

🇵🇹 🇦🇺 🇨🇦 Account holder
Passive Non-Financial Entity with one or more
controlling person that is a Reportable Person

**Company 2500**
Sheik Zayed
Dubai
🇦🇪 United Arab Emirates

BV TIN: 20

✛ Controlling person                    Individual

**Colin Speed**
Old St
St Peter Port
✛ Guernsey

Birth:

| Payments | | |
|---|---|---|
| | CRS501 | USD 30 |
| | CRS502 | USD 5 |
| | CRS503 | USD 5 |
| | CRS504 | USD 5 |
| **Account balance** | | **USD 20** |

# 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.

# 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:

## Submit nil returns

You may fulfil your reporting obligation by ticking the nil return tick box for the period selected.

If you record a nil return and subsequently need to submit account reports for the same reporting entity, the account report may be submitted under the 'Reports' tab and will effectively override the nil return.

If you submit an annual report in error and wish to replace it with a nil return, you will need to retract the annual report first before re-submitting a nil return. You are not allowed to submit a nil return for any UAE RFI which has already made a return (nil or otherwise) for the given reporting period.

| **Report type** | Common Reporting Standard (CRS) ⌄ |
|---|---|
| **Reporting period** | 31/12/2022 ⌄ |

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

# User Registration - Registration using UAE Pass

Login to FATCA CRS system is only possible using UAEPASS mobile application.

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.

## Help and support

Please see the following UAE Pass User Guide https://icp.gov.ae/en/uae-pass/For

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

# RFI Registration - 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.
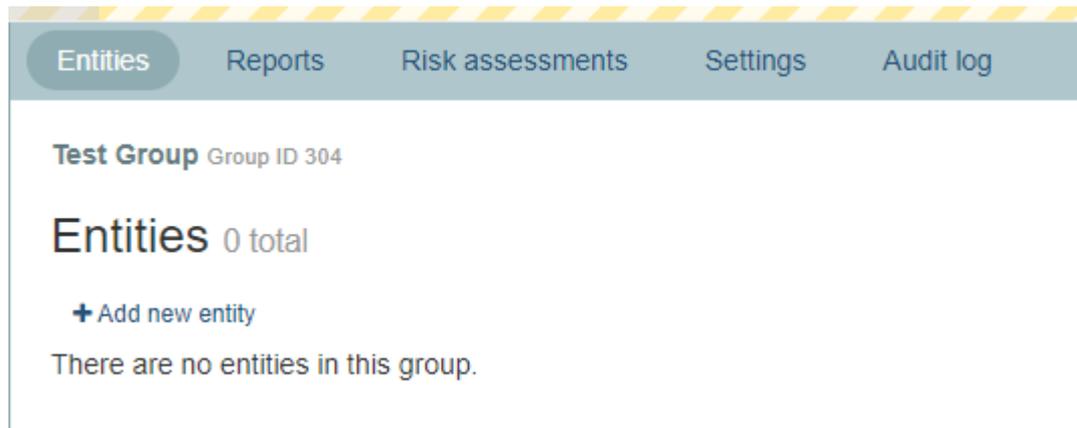


Press Save

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 authorised 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.

## Add entity

You will not be able to take any actions for this entity until it has been authorised by your Regulatory Authority.

| Type of reports this institution will submit | Classification This should match the legal classification or be the item that covers the greatest part of the business. | Reportable from |
|---|---|---|
| ☐ Common Reporting Standard | | |
| ☑ Foreign Account Tax Compliance Act | Depository Institution ⌄ | YYYY-MM-DD 🗓 IRS Registration Date |

Depository Institution
Custodial Institution
Specified Insurance Company
Investment Entity
Non Reporting Financial Institution
Active NFFE
Passive NFFE
Registered Deemed Compliant

**Regulated** AE)
enter (DIFC)
uthority (SCA)
Abu Dhabi Global Market (ADGM)

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

**Reportable from**

YYYY-MM-DD 🗓

| ‹ | January 2022 | › |
|---|---|---|

| Mon | Tue | Wed | Thu | Fri | Sat | Sun |
|---|---|---|---|---|---|---|
| 27 | 28 | 29 | 30 | 31 | 01 | 02 |
| 03 | 04 | 05 | 06 | 07 | 08 | 09 |
| 10 | 11 | 12 | 13 | 14 | 15 | 16 |
| 17 | 18 | 19 | 20 | 21 | 22 | 23 |
| 24 | 25 | 26 | 27 | 28 | 29 | 30 |
| 31 | 01 | 02 | 03 | 04 | 05 | 06 |

y Autho
ort to Central Bank of the UAE, DIFC and

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.

**Regulated by**
- ● Central Bank of the UAE (CBUAE)
- ○ Dubai International Financial Center (DIFC)
- ○ Securities and Commodities Authority (SCA)
- ○ Abu Dhabi Global Market (ADGM)
- ○ Non-financial regulated

If you are required to report this entity to more than one Regulatory Authority, you must create a new Group for each Regulatory Authority. E.g., should the entity be required to report to Central Bank of the UAE, DIFC and SCA, then you must create three (3) Groups, one for each Regulatory Authority

**GIIN (required for US_FATCA)**    2Z      99999.SL              Limited   ✖

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

**Name**    [                    ]

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 above.

**Save**

**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

## Limited - Registration Details

Name

Date of incorporation  2021-01-01

Country of incorporation  United Arab Emirates (AE)

**Contact details**

Business address country

Contact first name  Contact first name

Contact last name  Contact last name

Telephone  🇦🇪 ▾  050 123 4567

Business address  Business address

The bottom part of the form requires Licence information.

**Licence**

Licensing authority

Trade license or commercial license number

Trade license or commercial license  Browse...

Regulatory license Mandatory upload if RFI holds a regulatory license.  Browse...

Other documents You may upload additional documents in support of your registration.  Browse...

Files must have a .pdf, .jpeg or .jpg extension and be no larger than 20Mb.

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.

Entities   Reports   Risk assessments   Settings   Audit log

**Test Group** Group ID 304

## Limited

You will not be able to take any actions for this financial institution until it has been authorised by CBUAE.

| | |
|---|---|
| **Regulated by** | Central Bank of the UAE (CBUAE) |
| **GIIN** | 🇦🇪 2. . . . |
| **Name** | Limited |

### Registration Details

| | |
|---|---|
| **Name** | Limited |
| **Date of Incorporation** | 2021-01-01 |
| **Country of Incorporation** | United Arab Emirates |
| **Business Address Country** | United Arab Emirates |
| **Business Address** | Main Road |
| **Contact First Name** | Colin |
| **Contact Last Name** | Speed |
| **Contact Telephone** | +971501234567 |
| **Licensing Authority** | Insurance Sector of the Central Bank |
| **Trade license or commercial license number** | 12345 |
| **Trade license or commercial license** | ⬇ A1chq.jpg |
| **Regulatory license** | ⬇ A1chq1.jpg |
| **Other documents** | |

➜ Edit Registration Details

➜ See Previous Registrations

| Reporting types | Classification<br>This should match the legal classification or be the item that covers the greatest part of the business. | Reporting periods |
|---|---|---|
| Common Reporting Standard | Depository Institution<br>Change ▾ | 2022-12-31  🗑 |
| Foreign Account Tax Compliance Act | Depository Institution<br>Change ▾ | 2022-12-31  🗑 |

Submit to the checker.

☐ I confirm that all information provided in this registration is correct to the best of my knowledge.

**Submit for checking**

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

Submit to the checker.

☑ I confirm that all information provided in this registration is correct to the best of my knowledge.

**Submit for checking**

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.

This financial institution has been submitted to CBUAE for authorisation. You will not be able to take any actions until it has been authorised.

If you need to amend this financial institution further, you will first need to retract the outstanding authorisation request by clicking the button below.

Retract submission

# 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.

# RFI Registration - 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.

# RFI Registration - 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.

## Add entity

You will not be able to take any actions for this entity until it has been authorised by your Regulatory Authority.

| Type of reports this institution will submit | **Classification**<br>This should match the legal classification or be the item that covers the greatest part of the business. | Reportable from |
|---|---|---|
| ☐ Common Reporting Standard | | |
| ☑ Foreign Account Tax Compliance Act | Depository Institution ⌄ | YYYY-MM-DD 🗓<br>IRS Registration Date |

Depository Institution
Custodial Institution
Specified Insurance Company
Investment Entity
Non Reporting Financial Institution
Active NFFE
Passive NFFE
Registered Deemed Compliant

Regulated                                    AE)
                                        enter (DIFC)
                                        thority (SCA)

## 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.

# RFI Registration - 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.

B4

# RFI Registration - 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."

## Add entity

You will not be able to take any actions for this entity until it has been authorised by your Regulatory Authority.

| Type of reports this institution will submit | Classification<br>This should match the legal classification or be the item that covers the greatest part of the business. | Reportable from |
|---|---|---|
| ☑ Common Reporting Standard | Non Reporting Financial Institution ⌄ | Entities with this classification do not have a reporting obligation. |
| ☑ Foreign Account Tax Compliance Act | Non Reporting Financial Institution ⌄ | 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.

# RFI Registration - 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.

# RFI Registration - 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).

# RFI Registration - 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.

# RFI Registration - 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

# User Rights - 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.

## 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 organisations. This will mean the users can still be added, changed and removed should one administrator be unavailable.

# Submission of data - FATCA

**Scenario: I wish to submit my FATCA return, how do I do this?**

First, you must have registered your Financial Institution and have it authorised by the Regulatory Authority.

Once this is completed, the name of the RFI will appear with a white background in your list of entities.



The green tick shows a submission has already been successfully made.

A red circle with a white exclamation mark shows a submission is required for that reporting period.

The Excel templates for FATCA and CRS may be downloaded by selecting the Documentation menu.
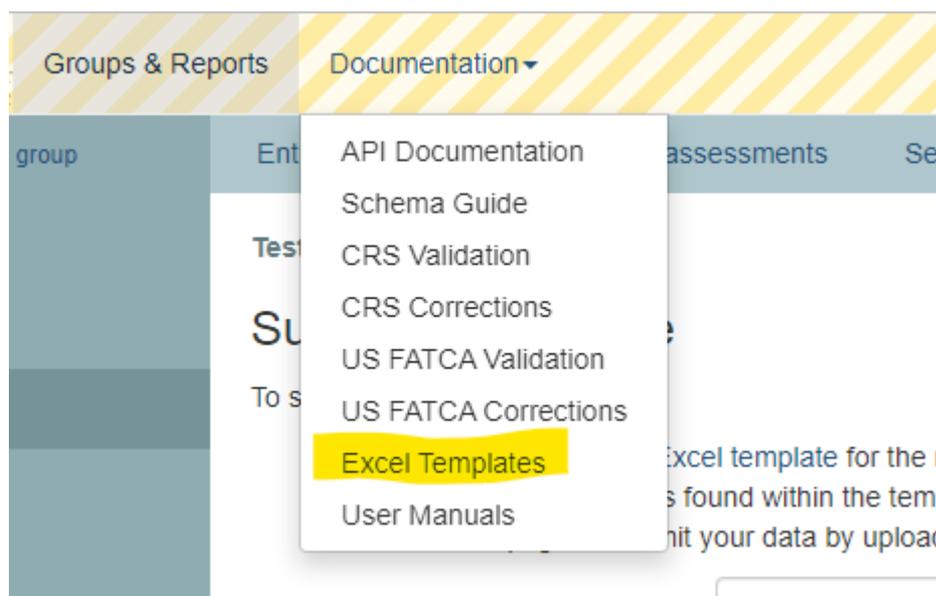


Once you have downloaded the template, please complete it in the normal way. The template should remain unchanged, and you must not add or remove any tabs or columns.

Click on Reports and select Submit an Excel File.

| Entities | Reports | Risk assessments | Settings | Audit log |
|----------|---------|------------------|----------|-----------|

**Test 22 April** Group ID 302

# Reports

📄 Submit an Excel file     📄 Submit nil returns

➕ View outcome of corrections and deletions

Filter:  | All ▾ | All ▾ |

Select FATCA from the drop-down menu and the Reporting period. It will list all the Financial Institutions which have a reporting obligation for that reporting period.

If the Financial Institution you require is not listed, it may be for the following reasons:

- The RFI has not been checked by the checker within your Group.

- The RFI has not been authorised by your Regulatory Authority.

- The reporting period for the FI is not currently open or set

- The RFI has already returned an Excel spreadsheet.

- The RFI has already submitted a nil return.

# Submit an Excel file

To submit data using Excel:

- ⬇ Download the relevant Excel template for the reporting type you wish to use.
- Follow the filing instructions found within the template to complete the data.
- Return to this page to submit your data by uploading the completed file.

**Report type**          Foreign Account Tax Compliance Act (US_FATCA)    ⌄

**Reporting period**     31/12/2022                                       ⌄

**Financial Institutions**    ⦿        Limited        99999.SI

**Excel file**           File must have a .xlsx extension and be no larger than 500Mb

                         Browse...

                         [ Submit ]

D1

# Submission of Data - FATCA Sponsoring entity

Sponsoring Entity have a reporting obligation for their Sponsored Entities in the UAE. (I.e. the .SP. GIIN is reporting the financial accounts (or nil return) for their group (.SS. SF. SD. SB. GIINs).

A Sponsoring Entity will not be able to report its own financial accounts (data report or nil report) (using their .SP. GIIN).

If the Sponsoring Entity is a UAE Reporting Financial Institution that has financial accounts (or nil reporting obligation) of its own, it is required to obtain a new GIIN from the IRS in order to fulfil its own FATCA obligation. The Entity is then able to do a fresh registration on the system using their new GIIN in order to fulfil its FATCA obligations.

Please note that the IRS FFI list is updated and published on a monthly basis. The Entity will only be able to initiate the fresh registration once the new GIIN has been published by the IRS.

# Submission of Data - CRS

**Scenario: I wish to submit my CRS return, how do I do this?**

First, you must have registered your Financial Institution and have it authorised by the Regulatory Authority.

Once this is completed, the name of the RFI will appear with a white background in your list of entities.



The green tick shows a submission has already been successfully made.

A red circle with a white exclamation mark shows a submission is required for that reporting period.

The Excel templates for CRS and FATCA may be downloaded by selecting the Documentation menu.
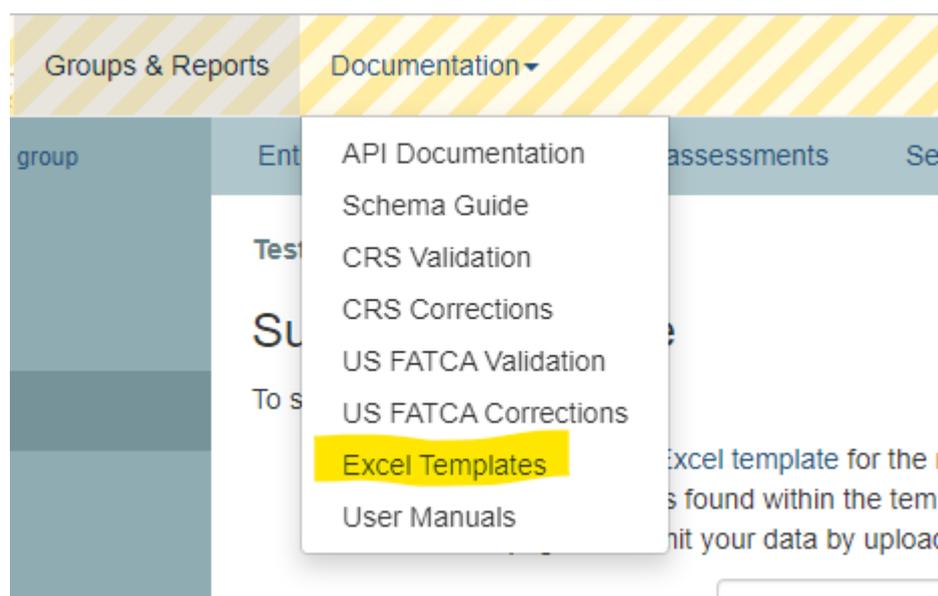


Once you have downloaded the template, please complete the templates by adding all CRS reportable accounts (and Controlling Persons, as relevant). Please follow the 'filing instructions' provided in the template carefully in order to accurately complete and submit

the CRS reporting template. The system will validate the data provided, giving errors and/or warnings where the data is not in the UAE Ministry of Finance and CRS required format.

Click on Reports and select Submit an Excel File

| Entities | Reports | Risk assessments | Settings | Audit log |
|----------|---------|------------------|----------|-----------|

**Test 22 April** Group ID 302

## Reports

📄 Submit an Excel file   📄 Submit nil returns          Filter: | All ▾ | | All ▾ |

⊞ View outcome of corrections and deletions

Select CRS from the drop-down menu and the Reporting period. It will list all the Financial Institutions which have a reporting obligation for that reporting period.

If the Financial Institution you require is not listed it may be for the following reasons:

- The RFI has not been checked by the checker within your Group

- The RFI has not been authorised by your Regulatory Authority

- The reporting period for the FI is not currently open or set

- The RFI has already returned an Excel spreadsheet

- The RFI has already submitted a nil return

## Submit an Excel file

To submit data using Excel:

- ⬇ Download the relevant Excel template for the reporting type you wish to use.
- Follow the filing instructions found within the template to complete the data.
- Return to this page to submit your data by uploading the completed file.

| **Report type** | Common Reporting Standard (CRS) ⌄ |
|-----------------|-----------------------------------|
| **Reporting period** | 31/12/2022 ⌄ |
| **Financial Institutions** | 🔍 Search by GIIN or name |
| | ○          Ltd          99999.SL. |

D3

# Submission of Data - Submission of Nil Returns

**Scenario: I wish to submit a Nil return, how do I do this?**

First, you must have registered your Financial Institution and have it authorised by the Regulatory Authority.

Once this is completed, the name of the RFI will appear with a white background in your list of entities.



The green tick shows a submission has already been successfully made.

A red circle with a white exclamation mark shows a submission is required for that reporting period.

## Nil Return

From the Reports menu, select Submit nil Returns



Nil Returns can be submitted for CRS or FATCA and the system will carry out the appropriate work.

Select the Reporting Type and the Reporting Period. Select the Financial Institutions for Nil

Returns.

You will need to click on the confirmation and press Submit.

## Submit nil returns

You may fulfil your reporting obligation by ticking the nil return tick box for the period selected.

If you record a nil return and subsequently need to submit account reports for the same reporting entity, the account report may be submitted under the 'Reports' tab and will effectively override the nil return.

If you submit an annual report in error and wish to replace it with a nil return, you will need to retract the annual report first before re-submitting a nil return. You are not allowed to submit a nil return for any UAE RFI which has already made a return (nil or otherwise) for the given reporting period.

| | |
|---|---|
| **Report type** | Common Reporting Standard (CRS) |
| **Reporting period** | 31/12/2022 |
| **Financial Institutions** | ☑   Ltd   9999.SI |

**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**

# 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, summarising 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.

If you have submitted reports, you will only be presented with the option of Archiving financial institution.



You may not submit further reports for an archived financial institution, but you can unarchive it. Unarchiving a financial institution requires re-authorisation by the Regulatory

Authority.

# Maker & 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 back to the maker.

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

# ITIES XML Reporting Guide

## Introduction

This document should be read in conjunction with the [IRS FATCA User Guide](#) and the Common Reporting Standard User Guide (annex 3 of the [OECD Standard for Automatic Exchange of Financial Information in Tax Matters](#)).

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.

This document bridges this gap by providing additional notes on how Bahrain FIs should report domestically using ITIES, and how ITIES interprets the XML schema.

## Conventions used

This document in general uses CRS element and attribute names and terminology. The CRS schema is structurally identically to the FATCA schema but some terminology is different. Where there are differences, FATCA terminology is included in brackets.

Throughout this document, the term *message* is used to refer to a complete XML document containing EOI information.

## 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 eactly 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/REC-xml/#dt-valid](http://www.w3.org/TR/REC-xml/#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 252.

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.

# Help and Support

## UAE Pass

Please see the following UAE Pass User Guide [https://icp.gov.ae/en/uae-pass/](https://icp.gov.ae/en/uae-pass/)

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