



## ***Manual Automatic Exchange of Information***

- ***FATCA***      ***Foreign Account Tax Compliance Act***
- ***CRS***        ***Common Reporting Standard***

***International data supply for tax year 2016  
according to XML-report schedule FATCA CRS version 2.1***

***Supply previous years:***

- ***2014 Manual AEOI version 1.2 with XML-report schedule version 1.5***
- ***2015 Manual AEOI version 1.3 with XML- report schedule version 1.6***

***Ministry of Finance – Directorate Fiscal Affairs***

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**Version management**

The table shows what has changed since the previous version. With version 2.0, we made a new start for fiscal year 2016. In the table it is indicated what has changed compared to version 1.6 for fiscal year 2015. [Version 2.1 contains in blue a few adaptations related to version 2.0.](#)

Version	Date	Modifications
2.0	18-10-2016	<p>Spread and published since fiscal year 2016 as the final version for the international data exchange. As from fiscal year 2016, the international data exchange shall apply to FATCA and CRS. The manual has been adapted on this.</p> <ul style="list-style-type: none"> <li>• A number of annexes were cancelled and have been replaced by references to documents on the IRS site or the OECD site or the community.</li> <li>• As from fiscal year 2016, IRS, for the exchange of FATCA-data will be using FATCA XML report schedule version 2.0. This has an effect on XML report schedule that has been applicable in Curaçao for Financial Intermediaries and Sponsors since fiscal year 2016. It's a FATCA CRS schedule and no longer a FATCA CRS ESRR schedule. <code>FATCA_CRS</code> is the root of FATCA CRS XML report schedule version 2.0 that shall apply for data supplies of financial institutions and sponsors (modifications regarding version 1.6 can be found in annex 4).</li> <li>• In the FATCA XML report schedule version 2.0, the IRS has added <code>NilReport</code> as part of <code>ReportingGroup</code> in order to provide blank document supplies with the possibility to indicate the Sponsor. The CRS XML report schedule has remained an unchanged version 1.0. and does not have <code>NilReport</code>. For blank document supplies, the CRS report schedule, in the XML Message Header has an indicator in the form of <code>MessageTypeIndic</code> (<code>CRS703</code> = blank document supply).</li> <li>• In the introduction of chapter 6, it is explained how financial institutions and Sponsors can submit blank document supplies to the Inspectorate for fiscal year 2016.</li> <li>• For <code>SubstantialOwners</code>, as from fiscal year 2016, it shall also be possible to submit <code>Organization</code> beside individual. At <code>SubstantialOwner Individual</code>, a number of birth fields were missing by mistake.</li> <li>• Within <code>AccountReport</code>, <code>Additional Data</code> was added because the FATCA XML report schedule version 2.0 contains these data.</li> <li>• At <code>ReportingFI</code> and <code>Sponsor</code>, <code>FilerCategory</code> was added as a field because the FATCA XML report schedule version 2.0 contains this data.</li> <li>• At <code>Accountholder Individual</code> and <code>Accountholder Organization</code>, <code>Withheld Tax</code> was deleted. The field was required for fiscal year 2015 due to the ESRR.</li> <li>• <code>PaymentType</code> has a more limited value list. The list was more extensive for fiscal year 2014 and 2015 because of the distinction required by the ESRR.</li> <li>• A few fields were added and eliminated compared to version 1.6. Also, some fields were limited in length via the XSD (this in accordance with FATCA XML report schedule 2.0). Furthermore, <code>TIN</code> shall be mandatory in <code>ReportingFI</code> as from fiscal year 2016.</li> <li>• The XML report schedules for fiscal year 2014 and 2015 were indicated with FATCA CRS ESRR. As from fiscal year 2016, the XML report schedule shall be indicated with FATCA CRS, because the data exchange is limited to FATCA and CRS. This also applies for the title of the manual.</li> <li>• Due to the new FATCA XML report schedule version 2.0, it shall no longer be possible to correct <code>ReportingFI</code> data exclusively and separately. If there is a correction, then you should not only submit the corrected <code>ReportingFI</code> but also the corresponding (unchanged) <code>ReportingGroup</code> (with <code>CorrDocRefId</code>'s).</li> <li>• Prior to the release of the PFGU for a fiscal year, it shall only be possible to do test supplies (<code>DocRefId/CorrDocRefId</code> = <code>OECD11</code>, <code>OECD12</code>, <a href="#">OECD13</a>) and as from the release of the PFGU it shall only be possible to do production supplies (<code>DocRefId/CorrDocRefId</code> = <a href="#">OECD1</a>, <a href="#">OECD2</a>, <a href="#">OECD3</a>).</li> </ul>

		<ul style="list-style-type: none"><li>• Annex 6 has been adapted because, since fiscal year 2016, beside FATCA notifications, CRS notifications shall also be applicable. Chapter 7 has also been adapted.</li><li>• Annex 7 has been adapted (a few controls disappeared, a few have been adapted textually and a few extra context controls have been added).</li></ul> <p><b>PLEASE NOTE:</b> As from fiscal year 2016, it shall be mandatory for accountholders who are US-persons, to provide the TIN. For financial institutions this will have an impact on their administration (and due diligence procedure).</p>
2.1	05-01-2017	On the title page and furthermore on pages 3, 25, 56, 105, 106, 107, modifications have been made since the supply of version 2.0 (modifications are marked in blue).

## 11. Introduction

### *International data supply by financial institutions*

This manual is intended for financial institutions that provide data to the Tax Inspectorate (hereinafter called the Inspectorate) in the framework of international data exchange FATCA and CRS for fiscal year 2016 and subsequent years. It concerns:

- Financial data in the framework of the Foreign Account Tax Compliance Act (FATCA) for US-persons,
- Financial data in the framework of the Multilateral Competent Authority Agreement on Automatic Exchange of Financial Account Information (MCAA), the Common Reporting Standard (CRS)<sup>1</sup> based on jurisdiction of residence in MCAA-countries.

Financial institutions (FI) provide data to the USA for the FATCA and to [MCAA-countries](https://www.oecd.org/ctp/exchange-of-tax-information/MCAA-Signatories.pdf) for the CRS (<https://www.oecd.org/ctp/exchange-of-tax-information/MCAA-Signatories.pdf>). FI's can also provide data in the role of Sponsor for Financial accounts. For each account, Financial data is provided **once** and **at AccountHolder** it should be indicated **for what countries** the Financial data **are intended**. That takes place at AccountHolder through the data **ResCountryCode** which appears 1 time or more times and also at AccountHolder through the combination **TIN** and **TIN@IssuedBy**. As from fiscal year 2016, the TIN shall be mandatory for accountholders for US-persons. In paragraph 6.3.2.3.1 and paragraph 6.3.2.3.2 it is indicated in the explanation with the TIN, what format the US-TIN should comply with.

### 1.1 Data supplies

#### *Support in International Data exchange for FI's and Sponsors in Curaçao*

All documents with regard to the Automatic Exchange of Information (AEOI) have been published in the Community International Data Exchange and information is also available about how financial institutions in Curaçao should provide data for FATCA and CRS. There is also a user instruction for the PFGU and FAQ and alerts are sent for important announcements. You can register for this community through: [Info.Aeoi@gobiernu.cw](mailto:Info.Aeoi@gobiernu.cw). The address is: <https://eoi-community.atlassian.net/login?destination=/wiki%2Fpages%2Fviewpage.action%3FpageId%3D491524&permission-violation=true>

#### *Data supplies for subsidiaries of FI's in a foreign country*

Data supply in the framework of FATCA CRS by subsidiaries of financial institutions in foreign countries shall occur in accordance with the process of the country where the subsidiary is located. This can be with or without an IGA if we're dealing with supplies to the IRS. CRS supplies start when the country of the subsidiary starts with the CRS exchange.

#### FATCA/CRS agreements for data supply

In the framework of FATCA and CRS, the agreed financial data have to be provided from the jurisdiction (in this case Curaçao). So, a financial institution or Sponsor shall provide data to the Inspectorate for all ReportingFI's located in Curaçao. The Inspectorate selects and provides the data intended for the USA and MCAA-countries.

Figure 1 shows how FATCA and CRS expect financial institutions with subsidiaries in different countries to provide data to the IRS and to a MCAA-country data. Financial institutions can only provide data for themselves as ReportingFI or they can supply for a number of ReportingFI's. For the IRS, each ReportingFI is registered with the IRS as a Foreign Financial Institution (FFI). The identification (TIN) of the ReportingFI is the GIIN as obtained for the FFI upon registration with the IRS and for the remaining reporting units the CRIB-number. The IRS has the concept of Sponsor. This is an organization that has registered with the IRS to provide data for one or more FFI's (a sponsor has its own GIIN with SP.531 at the end).

<sup>1</sup> No sooner than in September 2017 with data about fiscal year 2016.

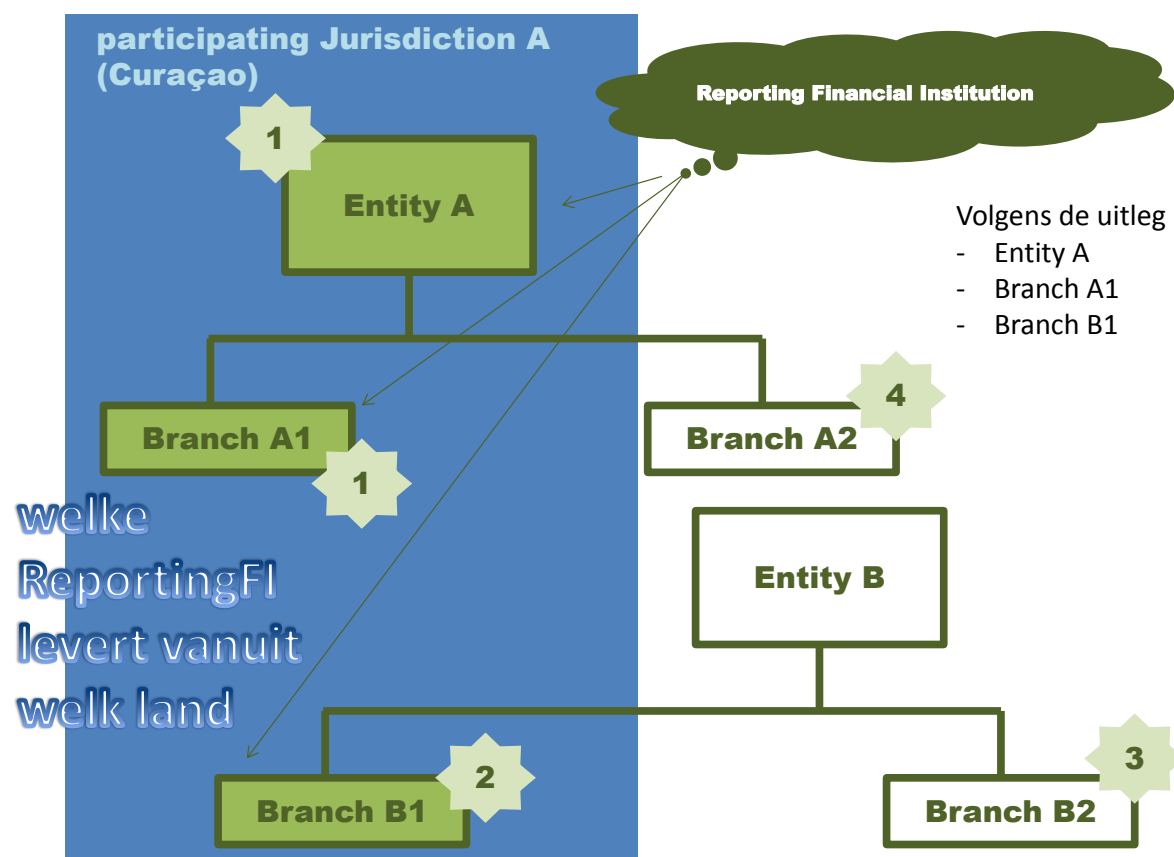
In the PFGU, financial institutions and Sponsors establish through relations for what ReportingFI's they are going to provide data. FFI's are ReportingFI's that have US-persons as accountholders and who are registered with the IRS as a unit on which the IRS is going to receive reports.

Figure 1 shows the various cases:

- Entity A provides data to the Inspectorate for itself and for Branch A1.
- Entity A provides data to the Inspectorate, not for Branch A2.
- Branch A2 independently provides data from the country of the subsidiary, not Curaçao in this case.

In this example, it could be considered to register only Entity A as FFI with the IRS and to report for Entity A and Branch A1. Branch A1 could deregister with the IRS, because Financial data supply is being done by Entity A. Branch A2 should register as FFI with the IRS and shall provide data, from the country of the subsidiary, for FATCA and CRS.

Branch B1, a foreign subsidiary of Entity B located in Curaçao, provides data independently through the Inspectorate to the USA, EU-countries and MCAA-countries. The mother company Entity B provides data from a foreign country. Branch B1 provides data for itself and does this through the Inspectorate in Curaçao. In this example, Branch B1 – if it has US-persons as accountholders – should register as FFI with the IRS as an FFI in Curaçao (and is at the same time a providing FI).



**Figure 1:** For what ReportingFI's does Curaçao have to supply data for provision to USA and MCAA-countries?

What Reporting FI provides from what country

According to the explanation . . .

### **Registration of Foreign Financial Institutions (FFI's) and Sponsors with IRS**

Financial institutions that provide data in the framework of FATCA shall register with the IRS.

<https://www.irs.gov/businesses/corporations/foreign-account-tax-compliance-act-fatca>. The received GIIN number is later required for identification upon the data supply.

### **Registration in the Portal PFGU**

For the data supply, the Portal Financial Data Exchange (PFGU) of the Inspectorate is used.

To provide FATCA and CRS data to the Inspectorate, Financial institutions register **as users of PFGU**.

**PLEASE NOTE.** Financial institutions acting as Sponsor for (a number of) FFI's, don't use their own CRIB-number, but the number that they have received from the Inspectorate after registration in the PFGU.

The Financial institution registers through <https://eoi.belastingdienst.cw/EOI/PortaalAEOI/home?init=true>

To request a new user account, you should do as follows:

1. Choose the task 'Request account' on the home page;
2. Enter the requested data, upload the correct documents (pdf, doc, docx, png, jpg, jpeg, bmp; a maximum of 10MB per file);
3. Choose 'Complete';
4. You will receive an e-mail report to confirm your request;
5. Click on the link in the e-mail through which the activation screen will be opened;
6. Check your data;
7. Choose 'Complete'.

If the request is denied, you will receive the instructions of the Inspectorate in an e-mail.

### **Entering Data**

After your file has been checked (XSD and **reconciliation checks from annex 7**) and scanned, then the concerned supply should be entered with the Inspectorate. You do this as follows:

- Choose the concerned file in the FATCA/CRS overview in the Uploads tab to open it and afterwards
- Choose the task "Enter"
- And confirm the entering.

After completing this task, you have entered your supply with the Inspectorate and you will receive a confirmation by e-mail.

### **Manual input in portal PFGU**

Beside the XML-report (for bulk), the PFGU also has the possibility of manual screen input in the PFGU. The procedure for both options is described in the PFGU user manual <https://eoi-community.atlassian.net/wiki/display/EOIC/PFGU+Usermanual>.

The Inspectorate collects the data and gives the IRS the FATCA-data and the CRS-data to the MCAA-countries. The ResCountryCode at accountholder is decisive for the selection for supply to the USA and MCAA-countries. In the supply to countries, at Accountholder, only the ResCountryCode of the concerned country has been included.

**PLEASE NOTE:** If a ReportingFI does not have any accountholder as US-person and/or a jurisdiction of residence in one or more MCAA-countries, the FI should enter a NON-supply for that fiscal year.

### **Notifications from USA and MCAA-countries**

If the Inspectorate has provided the data to USA and MCAA-countries, then **notifications on data level** can return from these countries (see **annex 6**). These shall be made available in the PFGU and can lead to a correction supply by the financial institution or sponsor.

### **Due Diligence procedure at financial institutions and Sponsors**

In order to determine what requires a report, it is necessary for Financial institutions to determine according to the due diligence procedures if an account needs a report (reportable accounts) and if an accountholder is a US-person. For the CRS, it should be determined in what country or countries the accountholder has his jurisdiction of residence (also see chapter 4 from the manual).



## 1.2. Manual and XML report schedule for the various fiscal years

- For fiscal year 2016:
  - Manual International Data exchange FATCA and CRS **version 2.0** and
  - XML report schedule FATCA CRS **version 2.0**.
- For fiscal year 2015:
  - Manual International Data exchange **version 1.3** and
  - XML report schedule FATCA CRS ESRR **version 1.6**.
- For fiscal year 2014 :
  - Manual International Data exchange FATCA CRS ESRR **version 1.2** and
  - XML report schedule FATCA CRS ESRR **version 1.5**.

## 2. Fiscal legal

### 2.1 Legislation

The National ordinance and treaties for international data exchange can be found on the website <http://www.gobiernu.cw> ) and in the [Community International Data exchange](#).

Based on the *National ordinance International Assistance upon the levying of Taxes (LIBB)*, the Financial institutions (those with a duty to keep an administration) must supply, on own initiative, the indicated data for the indicated persons to the Inspectorate. The LIBB became effective on 17 September 2015.

### 2.2. Treaties

#### **FATCA**

For the Mutual Data Exchange related to the FATCA, the Intergovernmental Agreement (CW IGA)<sup>2</sup> was signed on 16 December 2014 by the Minister of Finance of Curaçao and the Minister of Finance of the United States of America. The IGA became effective on 13 August 2016. For definitions and data to be provided, we refer to: <https://eoi-community.atlassian.net/wiki/pages/viewpage.action?pageId=9076752>

#### **CRS**

For the Mutual Data Exchange related to the CRS, the Minister of Finance signed the Multilateral Competent Authority Agreement on Automatic Exchange of Financial Account Information (MCAA) on 29 October 2014. . For definitions and data to be provided, we refer to: <http://www.oecd.org/tax/automatic-exchange/international-framework-for-the-crs/multilateral-competent-authority-agreement.pdf>

## 3. FATCA: Registration with the IRS of Foreign Financial Institutions

In the registration procedure it shall be determined if a financial institution is a reporting FI in the framework of the FATCA. If this is the case, then the financial institution shall register on the website of the IRS as a Foreign Financial Institution (FFI)). Financial institutions shall register as (a number of) FFI('s) with the IRS. <https://www.irs.gov/businesses/corporations/fatca-foreign-financial-institution-registration-tool>

<sup>2</sup> Agreement between The United States of America and The Kingdom of The Netherlands in respect of Curaçao to improve international tax compliance and to implement FATCA.

Upon registration on the website of the IRS, the financial institution shall receive a GIIN (the identification of the FFI for the FATCA-supplies to the IRS).

FFI's are recognized per fiscal year and can as such be dissolved with an end date in the registration with the IRS. The relation between financial institutions in Curaçao and the FFI's in the registration with the IRS shall be synchronized and updated by financial institutions and FFI's in the PFGU. These relations form the 'foundation' to do the data supply. For each FFI, the Financial data about US-persons are annually provided to the IRS.

A financial institution can be registered with the IRS as:

- Leader (LE)
- Member (ME)
- Single (SL)
- Branch (BR)
- Sponsor(SP)

A Leader is going to report for itself and its Members (FFI's). A Single reports for itself and a Branch is a subsidiary in Curacao of a foreign institution and it reports for itself. In addition, it's possible for a financial institution to report to the Inspectorate for its FFI's without reporting for itself and in that case (only supply data for its FFI's) it does not need to register with the IRS. And furthermore, a financial institution can register as a Sponsor (SP) with the IRS. In that case it is going to supply data for a number of FFI's. Sponsors report with the PFGU as supplying financial institutions in the role of Sponsor and then receive upon registration in the PFGU, a registration number that they should use instead of the CRIB-number as identification in CompanyIn and as reference in (Corr)MessageRefId and (Corr)DocRefId.

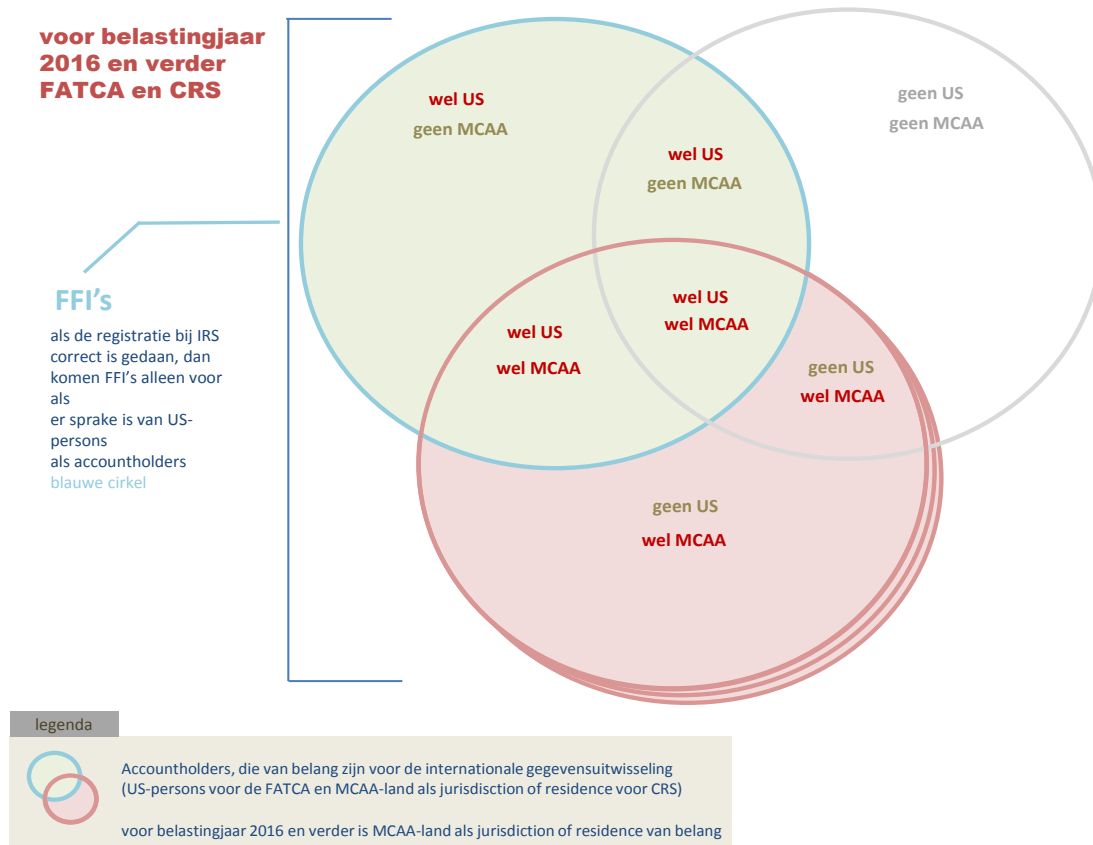
If the financial institution decides to terminate or remove a registration with the IRS, then the financial institution should also report this by e-mail at [Info.Aeoi@gobiernu.cw](mailto:Info.Aeoi@gobiernu.cw). The financial institution should also send an e-mail to [Info.Aeoi@gobiernu.cw](mailto:Info.Aeoi@gobiernu.cw) in case of registration with the IRS during the fiscal year.

In the data exchange, the FFI's are a special form of reporting FI's. In the rest of the manual, the term 'Reporting FI' is therefore used.

For the supply of data and accountholders with a jurisdiction of residence in one of the MCAA-countries, supply shall occur with the supplying financial institution as ReportingFI.

A financial institution can, in the PFGU, indicate by means of a selection button that they shall **NOT do a supply** for a certain fiscal year for a Reporting FI, because the ReportingFI does not have accountholders that are US-persons or that has an MCAA-country as jurisdiction of residence (the white field in figure 2).

In all other cases (the colored fields in figure 2), the financial institution should supply data to the Inspectorate for that corresponding fiscal year.



**Figure 2** NO supply (white surface) and Supply (colored surface) For fiscal year 2016 and furthermore FATCA and CRS / wel US = US / Geen US = non-US / wel MCAA = MCAA / Geen MCAA = no MCAA / FFI's if the registration with the IRS was done correctly, then FFI's shall only appear if there are US-persons as accountholders – blue circle / Legend – Accountholders that are important for the international data exchange (US-persons for the FATCA and MCAA country as jurisdiction or residence for CRS) for fiscal year 2016 and furthermore MCAA-country as jurisdiction of residence is important

If an FFI has only US-persons as accountholders and if it applies for all US-persons that the account balance remains under \$ 50.000, then this FFI as ReportingFI does not have to report to the IRS. Then it shall suffice for the ReportingFI to submit a **NilReport**; a **BLANK DOCUMENT supply**. If an FFI (as ReportingFI), besides US-persons also has accountholders with an MCAA-country as jurisdiction of residence, then one must supply for these accountholders and for US-persons with an account balance of \$ 50.000 or more. In order to supply the right data to IRS and MCAA-countries, the FI or Sponsor can for this FFI, make the selection by filling in ResCountryCode at accountholders for each time an accountholder has an MCAA-country as jurisdiction of residence and fill in US in ResCountryCode if the accountholder is a US-person with an account balance of \$ 50.000 or more. If the Account balance < \$ 50.000, then only the country codes of the MCAA-countries shall be supplied as ResCountryCodes. Thus, no data that are not provided to the USA and MCAA-countries shall be provided to the Inspectorate.

#### 4. Due Diligence procedures in financial institutions and annual data supply

It is expected of Financial institutions, that they select FATCA-data from their administration for all US-persons, and for all persons with jurisdiction(s) of residence in one of the MCAA-countries that have signed the MCAA.

##### 4.1. Jurisdiction of residence for CRS-supplies to MCAA-countries

For CRS-supplies it is necessary for the jurisdiction(s) of residence of accountholders to be recorded in the

administration with financial institutions (for jurisdiction of residence we refer to annex 2).

An accountholder can have several jurisdiction(s) of residence. In AccountReport/AccountHolder, these jurisdiction(s) of residence shall be supplied as repeating element. The requirements for recording jurisdiction of residence, the due diligence procedures, can be found in part II of <https://www.oecd.org/ctp/exchange-of-tax-information/implementation-handbook-standard-for-automatic-exchange-of-financial-information-in-tax-matters.pdf>

This is indicated with the CRS-standard. In this document, by means of a few issues, the CRS-standard is compared to the FATCA IGA Model 1, as effective in Curaçao.

#### **4.2. US-persons for FATCA-supplies to IRS**

For the FATCA it concerns US-persons (see definition in annex 1)

- In article 1 paragraph ee and paragraph ff it is defined for what persons Financial institutions in Curaçao have to supply data to the Inspectorate.
- In article 2 part a paragraph 2 it is defined what data financial institutions have to supply to the IRS through the Inspectorate.

#### **4.3. Annual Financial data to be supplied**

Financial institutions in Curaçao shall, for FATCA and CRS-supplies, have guaranteed that the required selection of data can be supplied annually. In order to supply the financial data, the Financial Institutions, each calendar year, shall have recorded (or deduce from the record) data on an annual basis and data per reference date the last day of the calendar year. For the supply of the exact FATCA-data, reference is made to article 2 part a paragraph 2 from the CW IGA. And for the CRS-data section 1 and 2 of the [MCAA](#).

**PLEASE NOTE:** financial institutions supply per account and at accountholder it is indicated through ResCountryCode for which MCAA-countries, the account data are intended. The IRS requests for a grouped supply per FFI; the CRS does not have such a grouping requirement.

#### **4.4. Types of accountholders**

FATCA and CRS identify other types of accountholders in case of an organization as accountholder.:

- If accountholder organization is a US-person, then the FATCA accountholder type should be supplied.
- Financial institutions have to supply CRS accountholder type, if for the accountholder organization it shall apply that one or more MCAA-countries is his/her jurisdiction of residence (see paragraph 6.3.2.3.2.2)

#### **4.5. Certain data groups only for FATCA and others only for CRS**

In the supplies, certain data groups are only recognized for FATCA and other data groups only for CRS. This is schematically indicated in the first figure of chapter 6. In order to supply data in these specific groups, financial institutions must have recorded the concerned data in the administration. We are talking about:

##### **Only for FATCA**

in ReportingFI

- **FilerCategory**

in the body of the report in ReportingGroup:

- **Sponsor** (including **FilerCategory**)

and within AccountReport

- **Substantial Owner**

- **Additional Data**

**Only for CRS**

in the body of the report in ReportingGroup and then within AccountReport:

- **Controlling Person**

## **5. Supplying and providing (corrected) data + Processing notifications**

This chapter describes the process for the supply of financial data by financial institutions and the provision of it by the Inspectorate to MCAA-countries in the framework of the international data supply for FATCA and CRS.

### **5.1. Process of supplying and providing + processing and correcting notifications**

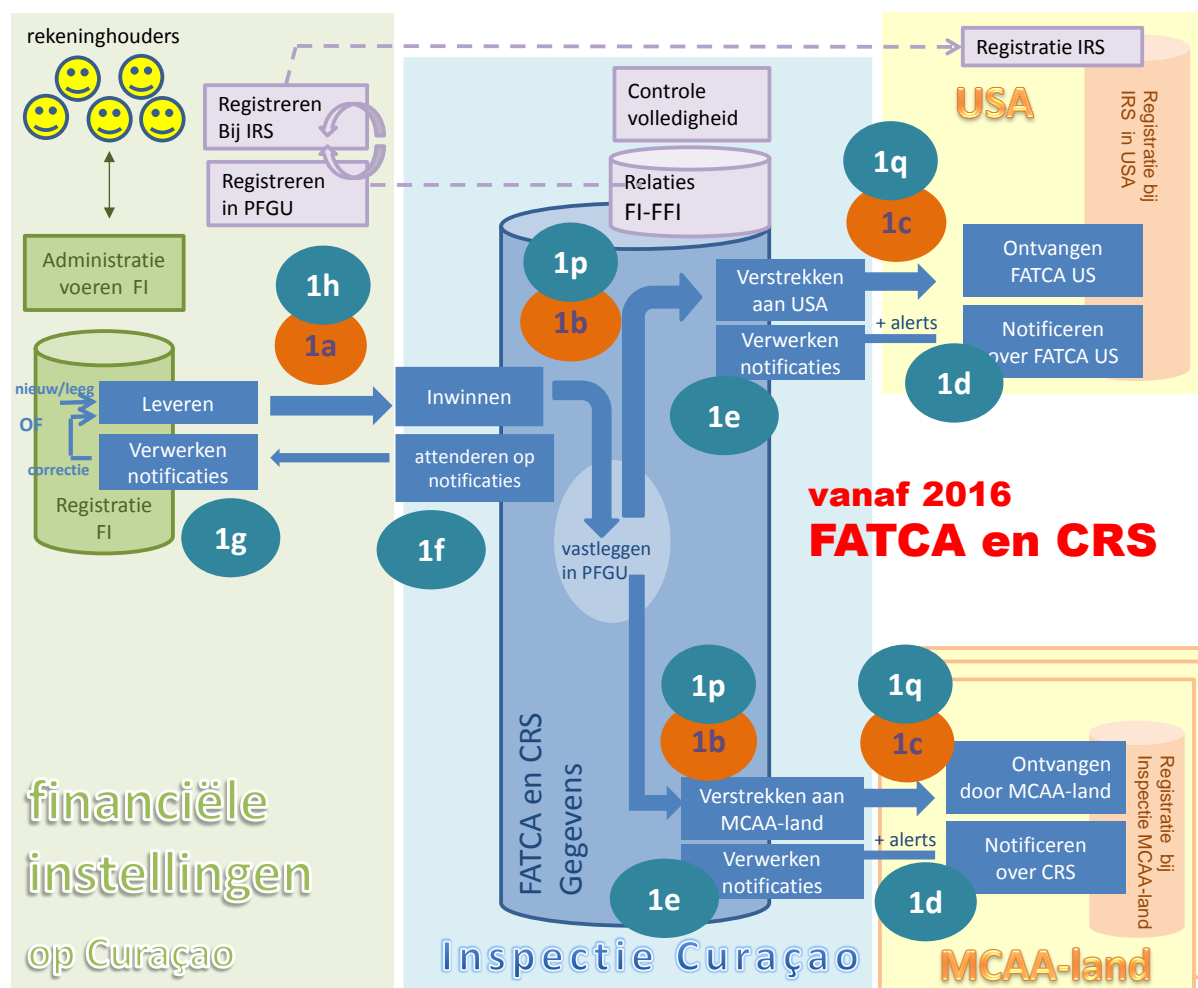
The Inspectorate provides the data to the following countries:

- to the USA for all Foreign Financial Institutions (FFI) registered with the IRS, the financial data of US-persons for the corresponding fiscal year,
- to MCAA-countries in accordance with the OECD-list on <https://www.oecd.org/ctp/exchange-of-tax-information/MCAA-Signatories.pdf> . The data are based on jurisdiction of residence in that MCAA-country for the relevant fiscal year,

For data supply by FI's, the combined XML-report for the Financial data for FATCA and CRS is used (one report for all international supplies of Financial data): FATCA CRS XML-report schedule version 2.0. Reports have XSD-controls and upon receipt, the PFGU performs a few reconciliation checks (see annex 7). If the data is manually entered in the PFGU, then report checks (XSD-checks) and reconciliation checks are performed upon entering the data.

Figure 3 shows:

- that FFI's are previously registered with the IRS and made known in de PFGU (**purple part**)
- how FI's/Sponsors supply data to the Inspectorate (**1a**);
- how the Inspectorate selects the data (**1b**) to provide to USA and MCAA-countries (**1c**);
- that USA and MCAA-countries send back notifications (**1d**);
- that notifications on the report level are dealt with by the Inspectorate (1e) and a correction follows (**1q**);
- that notifications on the data level are structured by the Inspectorate according to ReportingFI (**1e**) and that the relevant FI/Sponsor are alerted that there are notifications for ReportingFI's (**1f**);
- that FI's/Sponsors with notifications for ReportingFI's, process these (**1g**) and send a correction (**1h**);
- that the Inspectorate collects the correction supplies of the FI's/Sponsors (**1p**) and selects which country should be given a correction (**1q**).



**Figure 3** Supply by FI's/Sponsors – Providing to USA and MCAA-countries - Notifications and Correction

Financial institutions in Curaçao / accountholders / keep records FI / new / empty OR correction – Registration FI / Supply – Process notifications – Register with IRS – Register in PFGU / Inspectorate Curaçao / Check completeness / Relations FI – FFI / Obtain / Alert on notifications / record in PFGU / FATCA and CRS data / Provide to USA / Process notifications / Provide to MCAA country / Process notifications

Registration IRS / Registration with IRS in USA / Received FATCA US/ Notify on FATCA US / as from 2016 FATCA and CRS / Registration with Inspectorate MCAA-country / Received by MCAA country / Notify on CRS / MCAA country

The table below includes the planning of data exchange. Each year the international data exchange takes place in the 1st half year. The moment of data supply by financial institutions to the Inspectorate takes place before 31 March and the provision of data by the Inspectorate to the USA and MCAA-countries before 30 June. The supply of the Inspectorate to USA and MCAA-countries should be concluded within 9 months after the end of the calendar year.

Process steps/activities for Data Exchange	by	when
<b>Testing of data supply to PFGU through test service in PFGU</b>		
Publication of Manual Financial institutions and the user manual PFGU on the community	Inspectorate	Week 42
Testing of XML-reports by FI's at Portal Financial Data Exchange (PFGU) of the Inspectorate	FI or sponsor	Continuous
<b>Registration of FFI's with IRS and registration of relation FFI with FI in PFGU</b>		

Remind FI's and Sponsors to continue relations with FFI's or (make modifications)	Inspectorate	week 5
Register and update Foreign Financial Institutions (FFI) with the IRS (registration takes place through the web portal of the IRS)	FFI or FI	up to week 5
Register and update relations between financial institutions in Curaçao (FI) and FFI's for the data supply	FI or FFI	up to week 6
Record in PFGU that an FI does not have accountholders that are US-persons and does not have accountholders that have an MCAA-country as jurisdiction of residence	FI or Sponsor	week 6
Download updated list FFI's from IRS-site and update PFGU - add a new FFI and stop FFI's deleted at the IRS	Inspectorate	week 6
If necessary, organize an information session FI's and (small) Trust companies about what FATCA requires regarding preparations (own registration, report traffic, registration FFI)	Inspectorate	week 6
Still establish relation between FI and FFI as result of a reminder	FI or sponsor	week 6
<b>Release PFGU to TEST data exchange FATCA CRS</b>		
Release PFGU to TEST for data exchange FATCA CRS	Inspectorate	Friday week 6
<b>Data supply by financial institutions + provision by the Inspectorate to USA and MCAA-countries</b>		
Test period for financial institutions in order to determine the validation of the XLM-report by means of test report with test data -	FI or sponsor	week 7 -10
<b>Release PFGU for SUPPLY of data for Exchange FATCA CRS</b>		
Obtain supplies from FI's and control on XML report schedule + make alerts and notifications in the form of error notifications on the supplies available to the FI's and sponsors	Inspectorate	week 10-13  deadline 31 March
Learn about alerts and notifications and assess + do a correction supply if necessary	FI or sponsor	week 10-13
Check on and remind about completeness of supply by all FI's for all FFI's (data have been supplied for FFI or there is a blank data supply for FFI)	Inspectorate	week 13
If incompleteness is detected, then the related FI's and the Inspectorate shall go through the steps to supply and receive again.	FI's/Sponsor + Inspectorate	Week 10-13
Select, collect financial data for each MCAA-country and USA and provide these to USA and MCAA-countries	Inspectorate	week 14-16 deadline 30 June
Obtain data, assess and send back alerts and notifications to the Inspectorate	IRS and MCAA-countries	week 14-39

<i>Receive and process alerts and notifications of USA and MCAA-countries:</i> <ul style="list-style-type: none"> <li>- Notifications on report level shall be handled by the Inspectorate itself</li> <li>- Notifications on data level for REPORTING FI's, the Inspectorate shall make available to the FI or sponsor that supplied the Reporting FI-data</li> </ul>	Inspectorate	week 14-39
<i>Process notifications on datagroup level FFI's and provide corrections to the Inspectorate</i>	FI/sponsor (+Reporting FI)	week 14-39
<i>Obtain correction supplies from FI's and check on XML-report-schedule + make alerts and notifications in the form of error notifications on correction supplies available to FI's or sponsors</i>	Inspectorate	Week 14-39
<i>Process notifications on datagroup level Reporting FI's and provide corrections to the Inspectorate</i>	FI/Sponsor (+Reporting FI)	week 14-39
<i>Obtain 2<sup>nd</sup> correction supplies from FI's (complete and correct)</i>	Inspectorate	week 14-39
<i>Check on and remind about completeness of correction supply by all FI's for all Reporting FI's (to be regarded as follow-up of notifications)</i>	Inspectorate	week 14-39
<i>If incompleteness is detected, then the concerned FI's and the Inspectorate will have to go through the steps to supply and receive again.</i>	FI's/sponsor + Inspectorate	week 14-39
<i>Select and collect corrected data per MCAA-country and USA and provide to USA and MCAA-countries</i>	Inspectorate	week 14-39
<i>Determine that the processing of selecting and collecting corrections went well. Execute data preparation and provide financial data to each MCAA-country and USA.</i>	Inspectorate	week 14-39  deadline 30 September

### Supply of data by Financial institutions and Sponsors to the Inspectorate

Financial institutions shall supply for themselves and all Reporting FI's falling under them, data about accounts and at accountholder they shall indicate through ResCountryCode for what countries the data are intended. They supply to the Inspectorate. As from fiscal year 2016 they shall supply for US-persons (FATCA) and accountholders with a jurisdiction of residence in an MCAA-country (CRS).

In addition, the IRS has Sponsors with a GIIN, who supply for a few FFI's as ReportingFI's. Sponsors cannot supply for themselves through the Sponsor GIIN. If accountholders of the FFI, for which a Sponsor supplies, also has a MCAA-country as jurisdiction of residence, then the Sponsor can also supply data for these accountholders to the Inspectorate and this does not have to occur through another ReportingFI.

Completeness is assured through the agreement that financial institutions shall also send a report to the Inspectorate for Reporting FI's without data. That report has, in de MessageHeader, a MessageTypeIndic = CRS703 and has a NilReport in the ReportingGroup.

Another agreement for monitoring completeness is unsubscribing a supply for an FFI through the PFGU, because for the concerned fiscal year no US-persons are accountholders at the FFI. In case of such an unsubscription, the FFI is terminated in the PFGU as a unit for which data is supplied in the framework of the FATCA by an employee of the Inspectorate, based on the received report. The Inspectorate periodically checks for fiscal years for which data can be supplied if all FFI's registered on the IRS site are available in the CRIB (and thus in the PFGU).



**Data supply by the Inspectorate to the USA and MCAA-countries**

The Inspectorate collects all data of all financial institutions and checks if they know from all Reporting FI's, what data should be passed on or that a Reporting FI does not have to supply data. Afterwards, the Inspectorate supplies data to the USA and MCAA-countries:

- to USA, data about US-persons in which only ResCountryCode='US' and TIN with TIN@IssuedBy='US' shall be supplied. For all FFI's for which no data are supplied, a NilReport shall be supplied.
- to MCAA-countries, data about persons having the concerned MCAA-country as jurisdiction of residence (only ResCountryCode='MCAA-country' and TIN with TIN@IssuedBy='MCAA-country' shall be supplied). If data is supplied to an MCAA-country for at least one ReportingFI, then that MCAA-country shall receive blank data supplies for the ReportingFI's for which no data is supplied to that MCAA-country.

**Processing of Notifications of the USA and MCAA-countries by the Inspectorate and FI's and Sponsors**

If data are not correct, the IRS and MCAA-countries shall send a notification to the Inspectorate. The Inspectorate sorts out these notifications to Reporting FI and sends an e-mail alert to the FI or Sponsor who supplied the data to the Inspectorate on behalf of the Reporting FI. In PFGU, the notifications on data level shall be available for inspection.

**PLEASE NOTE:** Notifications can arrive years after date and are then related to previous years. Financial institutions and the Inspectorate (by means of PFGU) should be able to process the notification for those previous years and they should be able, if necessary, to provide a correction report for those previous years and supply the same to the IRS and MCAA-countries.

**Corrections supply by FI's and Sponsors to the Inspectorate**

If it appears from the assessment of the notification that corrections have to be supplied, than the financial institution or Sponsor shall hand in a correction supply with the correct data and references to the original report (CorMessageRefId) and – for the part of the report that was modified – a reference to the part in the original report that was modified (CorrDocRefId).

**Corrections supply by the Inspectorate to the USA and MCAA-countries**

Subsequently, the Inspectorate collects all corrections and supplies the corrections to the IRS and MCAA-countries.

**5.2. Logistics and PFGU as support for financial institutions and the Inspectorate**

PFGU supports:

- supplying through FATCA CRS XML reports or manual entry in the PFGU of agreed financial data by financial institutions and Sponsors to the Inspectorate;
- supply by the Inspectorate of agreed financial data to the USA and MCAA-countries;
- processing of notification about supplied data of the USA and MCAA-countries to the Inspectorate and dealing with notifications and making them available to FI's and Sponsors;
- receiving agreed financial data from the USA and MCAA-countries about accountholders with Curaçao as jurisdiction of residence for taxation and supervision by the Inspectorate;
- the provision of notifications to the USA and MCAA-countries by the Inspectorate.

**5.2.1. Financial institutions register in PFGU what FFI's are registered with the IRS**

If a financial institution is registered and admitted as a user, the financial institution can, through PFGU, link the FFI's, as registered with the IRS, to the financial institution. With the relation, it is indicated that the financial institution supplies the financial data for the concerned FFI. Upon registration in PFGU, the relation with itself is established in a standard manner (supply for oneself). If the FI does not supply for itself, this relation has to be deleted. Sponsors establish, in the PFGU, relations with the FFI's for which they are going to supply.

**5.2.2. Financial institutions and Sponsors supply data to the Inspectorate through PFGU**

When all relations have been established, then the financial institution can, in PFGU, offer data supplies for his Reporting FI's for FATCA and CRS and later on offer possible corrections thereof. In the screen input, upon entry, the confirmation of the entry as such takes place. When the data has been assessed, the financial institution shall receive an e-mail (alert) that the processing report has been made available on PFGU.

In the processing report it is indicated if the data supply complied with the FATCA CRS XML report schedule version 2.0 and if there have been supplies for all Reporting FI's.

### **5.2.3. Financial institutions receive notifications from the Inspectorate through PFGU**

The IRS and MCAA-countries send e-mails (alerts) back to confirm the receipt and processing. If notifications (errors in the supply) arrive at the Inspectorate, then the PFGU makes the notifications on data level available for each financial institution or sponsor who supplied data with errors.

By means of an e-mail (alert) financial institutions are reminded that notifications are ready in PFGU. If there are no notifications for a supply, then the financial institutions shall receive an e-mail (alert) with the information that the data supply was correctly processed by the IRS and MCAA-countries.

### **5.3. Test service to test the supply of data**

PFGU provides in an XML test service for financial institutions in order to test the supply of financial data against the XML report schedule. The test service is continuously available for data supplies of previous years and in January of each year for the current fiscal year.

The test service becomes available after the registration process has been completed and terminated. For the procedure of the test service, reference is made to the user manual in the community.

### **5.4. Identification of reports and parts thereof – reference to the original in case of correction**

The FATCA/CRS report, in the **Messageheader** has elements to identify the report as such, but also references to the report that is being corrected, deleted or modified:

- **MessageRefId** is the identification of the report itself,
- **CorrMessageRefId** refers to the MessageRefId report, of which data is corrected, deleted or modified.

Furthermore, the FATCA/CRS report has, for the various parts of the report, the same mechanism of identification. This occurs through the datagroup **DocSpec**. The following elements are available in DocSpec:

- **DocRefId** as identification of the datagroup within the report itself
- **CorrDocRefId** as reference to the identification of the corresponding datagroup, that gets corrected or modified.

In the FATCA CRS XML report, the datagroups ReportingFI, Sponsor and AccountReport can be separately corrected, deleted or modified with the DocSpec-mechanism. If (one) element(s) are corrected or modified in a datagroup, then the entire datagroup gets included in the correction report. So, the mechanism of replacement of the datagroup as a whole shall be used. International data supply FATCA/CRS consists of two types of report:

1. Reports of financial institutions to the Inspectorate,
2. Reports of the Inspectorate to respectively the IRS (FATCA) and to MCAA-countries.

#### Ad 1

For these **reports**, financial institutions or Sponsors give unique identifications to the report (MessageRefId and thus also CorrMessageRefId) and to datagroups in the report (DocRefId and thus also CorrDocRefId). The (Corr) MessageRefId and the (Corr)DocRefId in these reports have to start with the 2-letter country code according to ISO 3166 followed by the fiscal year (JJJJ) for which the data in the report applies to. For fiscal year 2016, the first six characters of both (Corr)MessageRefId as (Corr)DocRefId shall be equal to '**CW2016**' followed by the **CRIB-number** of the supplying financial institution or the code received upon the registration with the PFGU in case of a Sponsor as supplying financial institution.

These **reports** are supplied to the Inspectorate by a financial institution (CRIB-number in element SendingCompanyIN in the Messageheader of the report) or by a Sponsor (number received upon registration with the PFGU in SendingCompanyIN in the Messageheader of the report) and contain all financial data for the ReportingFI, that belong to that financial institution.

#### Ad 2

For these **reports** the Inspectorate, IRS or an MCAA-country give unique identifications to the report (MessageRefId and thus also CorrMessageRefId) and to datagroups in the report (DocRefId and thus also CorrDocRefId).

Because of traceability and uniformity in several countries which are supplied to, for provisions to the USA and MCAA-countries, (Corr)MessageRefId consists of:

- country code of the supplying country on position 1 and 2,
- on positions 3 to 6, the fiscal year for which data is provided,
- country code of the receiving country on positions 7 and 8,
- the serial number (FileId) of the FGO-file (from position 9).

(Corr)DocRefId that are used in FATCA-provisions, get format **GIIN.Fiscal year.Dossier-Id.Record-Id**, because the IRS has made such a structure mandatory for (Corr)DocRefId (these are created by the PFGU upon providing the data to the IRS):

- GIIN is the GIIN of the ReportingFI (one of the FFI's that are registered with the IRS),
- File-Id is the file Id of the FGO-file
- Record-Id is the record-Id that the DocSpec element belongs to, so for example the Account report record or ReportingFI record.

DocRefId's, that are used for a CRS-supply, get the format, upon creating the report to be supplied, that is consistent with the format for the FATCA-supplies as much as possible: **Fiscal year.File-Id.Record-Id** (so without GIIN. on the front side).

If notifications of the IRS return to the Inspectorate, then the DocRefId's from the report of the IRS shall be converted to the original DocRefId's from the supply of the relevant FI.

These **reports** are sent by the Inspectorate and contain for example collected financial data for all Reporting FI of all financial institutions in Curaçao for US-persons intended for the IRS (FATCA) or collected financial data for persons with a certain MCAA-country as jurisdiction of residence.

The PFGU will have to register the link between both types of report in order to later on, in case of notification and alerts from the IRS or an MCAA-country, 'be able to go back to the reports of the financial institutions to send back the notification or alert on the right report to the sending financial institution.

On the report level, the FATCA CRS XML report schedule has a class indication **MessageTypeIndic**, with which it is indicated if the relevant report only contains new data (CRS701) or if it only contains corrected, deleted or modified data (CRS702) or if it contains ReportingFI's for which no supplies are made (CRS703), the so-called blank data supply.

The CRS XML report schedule also knows this class indication. The FATCA XML report schedule does not know this class indication and did not provide blank data supplies in version 1.1. From version 2.0, the FATCA XML report schedule does provide blank data supply, namely through a NilReport in ReportingGroup. This has consequences for the blank data supply through the FATCA CRS XML report schedule version 2.0 (see introduction of chapter 6).

In exceptional cases a complete report can be deleted. This is only used if there was a big error prior to or during the supply or provision of the report (a damage for example). In that case a report is sent with as CorrMessageRefId, the identification of the report to be deleted and MessageTypeIndic ==CRS702 (both in the Messageheader). In all DocSpec datagroups, DocTypeIndic = OECD3 (or OECD13 in case of a test supply). The correction report by means of which a previous report is deleted, is always followed by a new report with MessageTypeIndic = CRS701 and in all DocSpec datagroups DocTypeIndic = OECD1 (or OECD11 in case of a deleted test supply). This possibility should be used with the utmost restraint. And if it is used, then extreme care shall be required and it shall not otherwise be possible but to remove ALL reports (correction reports and initial report) in order to start all over with a report with new data.

Three examples (not during test) of correction of datagroups of a report shall be presented:

- Correction of Payment Amount (Payment Amount belongs to the datagroup AccountReport).  
The entire datagroup AccountReport with therein AccountNumber, AccountHolder, SubstantialOwner, ControllingPerson, Account balance, Payment (modified) and AdditionalData, shall be included, fully completed, in the correction report. Payment Amount contains the corrected value.  
DocTypeIndic in DocSpec of AccountReport = OECD2.
- Correction of several data, for example Name and Address of AccountHolder and Payment Amount (AccountHolder and Payment Amount both belong to the datagroup AccountReport).  
The entire datagroup AccountReport with therein AccountNumber, AccountHolder (modified), SubstantialOwner, ControllingPerson, Account balance, Payment (modified) and AdditionalData, shall be included, fully completed, in the correction report. Name and Address at AccountHolder and Payment Amount contain the corrected data. DocTypeIndic in DocSpec of AccountReport = OECD2.
- Only correction of ReportingFI and no correction in ReportingGroup  
ReportingFI shall be fully supplied again with correction of data where necessary. DocTypeIndic in DocSpec of ReportingFI = OECD2. The datagroup ReportingGroup is not included in the report.

Furthermore there is also correction of data supply to a blank data supply for the relevant ReportingFI and reverse correction of a blank data supply for a ReportingFI to a data supply for the relevant ReportingFI:

1. From supplied data to blank data supply for a ReportingFI

Imagine that data were supplied for a ReportingFI in report with MessageRefId = CW2016CRIBnrAbcd with MessageTypeIndic = CRS701 (new data) and within the body data of the ReportingFI and AccountReports in the ReportingGroup.

Upon closer inspection, it appeared that this ReportingFI is not a US-person after all and it also does not have accountholders with an MCAA-country as jurisdiction of residence. This can be corrected by sending a correction report with CorrMessageRefId = CW2016CRIBnrAbcd and for example. MessageRefId = CW2016CRIBnrAbce and MessageTypeIndic = CRS703 (blank data supply) and then in the body the ReportingFI and in the ReportingGroup a NilReport (see introduction chapter 6).

2. From a blank data supply for a ReportingFI to data supply for the relevant ReportingFI

Example: For a ReportingFI it is indicated that there are no US-persons and no accountholders with an MCAA-country as jurisdiction of residence, for which data should be supplied. This was done with a report with MessageRefId = CW2016CRIBnrAbcf with MessageTypeIndic = CRS703 (blank data supply) and within the body data of the ReportingFI and a ReportingGroup with a NilReport.

Upon closer inspection, it appeared that data should have been supplied for this ReportingFI. This can be corrected by sending a correction report with CorrMessageRefId = CW2016CRIBnrAbcf and for ex.

MessageRefId = CW2016CRIBnrAbcg and MessageTypeIndic = CRS702 and then in the body data of the ReportingFI and in the ReportingGroup the AccountReports with the data that have to be supplied.

DocTypeIndic in all appearing DocSpec in ReportingGroup of the relevant ReportingFI = OECD1.

Sponsor data are part of ReportingGroup (consisting of 0..1 Sponsor and EITHER one NilReport OR 1..N AccountReports) and cannot be corrected as the only one in a correction report. A result of this is that, if a Sponsor wishes to adapt own data through a correction report, this should always go hand in hand with EITHER a minimum of one AccountReport (in case data was supplied for the ReportingFI) OR one NilReport (in case there was a blank data supply for the ReportingFI).

From fiscal year 2016, it shall no longer be possible to correct data as a lone ReportingFI, because in the MessageBody there should always be one ReportingFI and one ReportingGroup. If ReportingFI data have to be corrected, then this should occur as from fiscal year 2016 with a correction report consisting of the corrected ReportingFI and the corresponding (unmodified) ReportingGroup with a NilReport in case of a blank data supply and one or more AccountReports in case of supplied data and if applicable supplemented with Sponsor data.

### 5.5. Test supplies for release PFGU and production supplies after release PFGU

#### Test supplies until the release of the PFGU for the relevant fiscal year

Until the release of the PFGU for the actual data supply (in production), the PFGU shall only accept test supplies with DocRef's with DocTypeIndic = OECD11, OECD12 or OECD13 (respectively new test data, corrected test data or deleted test data).

#### Production supplies after release of the PFGU for the relevant fiscal year

From the release of the PFGU for the actual data supply (in production), PFGU only accepts production supplies with DocRef's with DocTypeIndic = OECD1, OECD2 or OECD3 (respectively new test data, corrected test data or deleted test data to be provided to the USA and MCAA-countries).

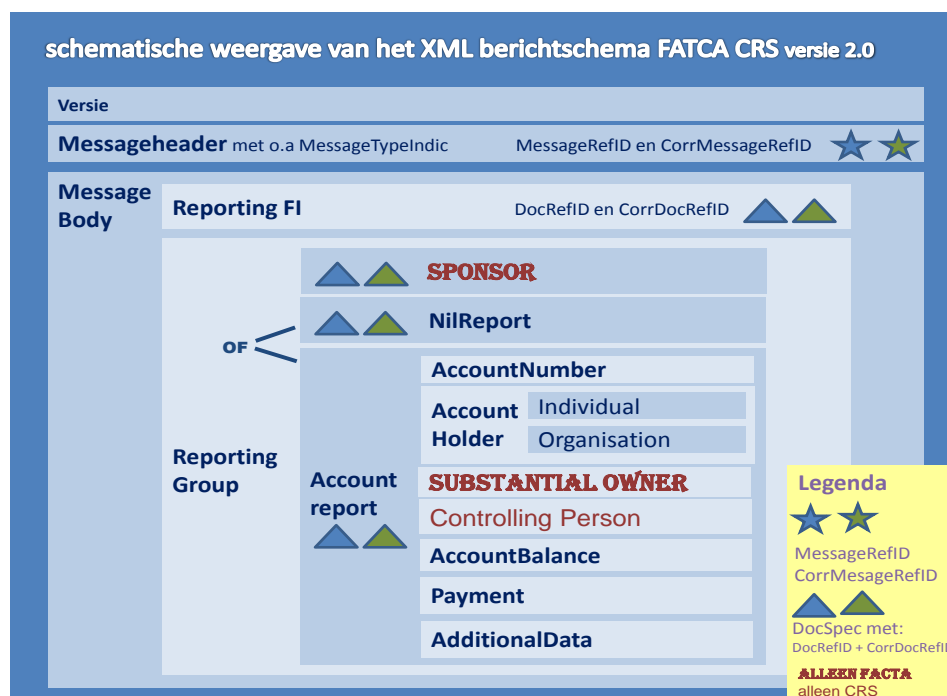
During the context checks things are checked on both requirements:

- no production data in test supplies;
- no test data in production supplies;
- test supplies for a certain fiscal year shall only be allowed prior to the release of the PFGU for that fiscal year;
- from the release of the PFGU only production supplies shall still be allowed for that fiscal year.

### 6. Report structure for international data supply FATCA and CRS

Financial institutions or Sponsors supply according to the FATCA CRS XML report schedule version 2.0 reports with one supply data intended for FATCA and CRS. The structure of the FATCA CRS XML report schedule is visualized in figure 4a and 4b. The figures show which parts of the report (triangles) can be corrected, deleted or modified. The possibility for correction, removal or modification of a report are indicated by means of stars. The FATCA CRS XML report schedule consists of the following parts:

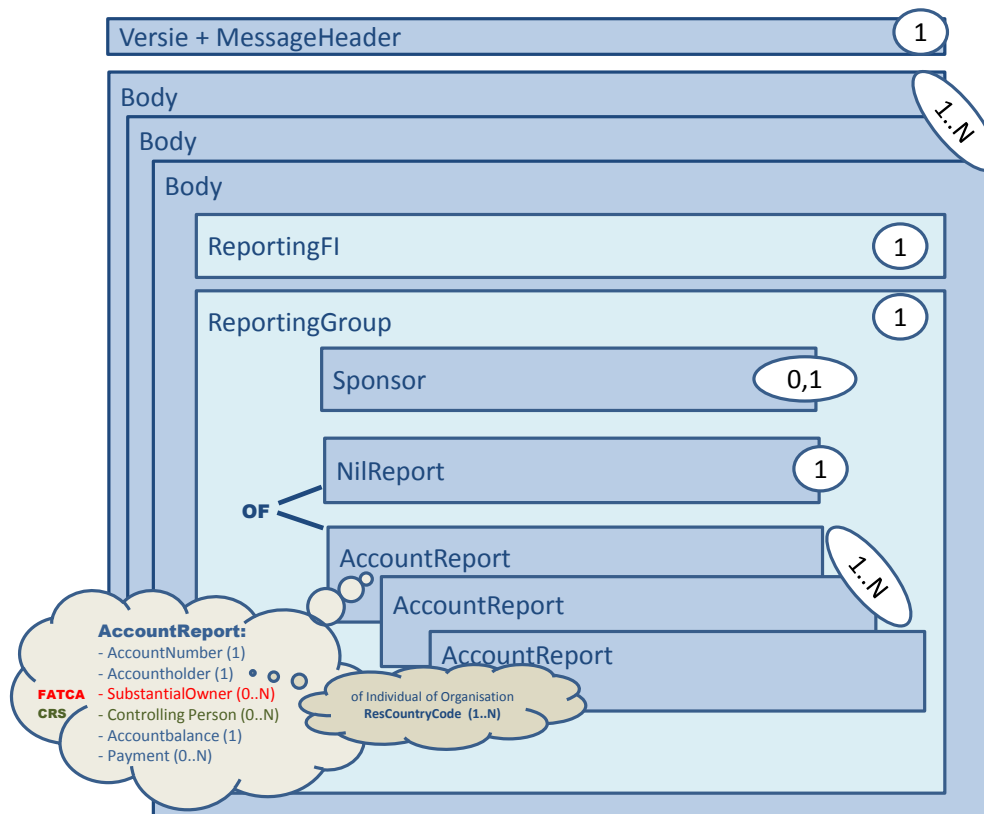
- **Report type + Version** (one per report)
- **Messageheader** (one per report) with the logistical data of the report,
- **MessageBody** (one or several) of the report with the following datagroups therein:
  - **ReportingFI** (one per body),
  - **ReportingGroup** (one per MessageBody) with the following datagroups therein:
    - **Sponsor** (optional (0,1) and only intended for FATCA-supply)  
EITHER one NilReport in the ReportingGroup:
      - **NilReport**
 OR one or more AccountReports in the ReportingGroup:
      - **AccountReport(s)** with therein:
        - **Accountnumber** (one in an AccountReport)
        - **Accountholder** (one in an AccountReport); Accountholder has 1 or more ResCountryCode(s) with as many combinations TIN and TIN@IssuedBy (for each country, to which data has to be supplied, a ResCountryCode and a combination TIN and TIN@IssuedBy)
        - **Substantial Owner** (none or several in an AccountReport; only intended for FATCA supply)
        - **Controlling Person** (none or several in an AccountReport; only intended for CRS supply)
        - **Account balance** (one in an AccountReport)
        - **Payment** (none or several in an AccountReport)
        - **AdditionalData**



**Figure 4a;** visualization of the structure of the FATCA CRS XML report schedule version 2.0  
Schematic representation of the XML report schedule FATCA CRS version 2.0 / Version / Messageheader with MessageTypIndic, among others / MessageRefID and CorrMessageRefID / DocRefID and CorrDocRefID  
Legend / DocSpec with: / only CRS

The following figure shows what can singularly (1), optionally (0,1) and often appear in the report (1..N).

Versie = version / Of = Or



**Figure 4b:** cardinalities within the FATCA CRS XML report schedule version 2.0



Because Curaçao supplies data and receives data from the IRS according to the IGA model 1, financial institutions in Curaçao shall not be allowed to use the possibility of sending a PoolReport. Financial institutions in Curaçao therefore report about US-persons only through AccountReports. In the FATCA CRS report, Intermediary is also missing, because the latter does not appear in Curaçao.

At Accountholder, there is an extra field to indicate that the relevant Accountholder is recalcitrant. PFGU will take care of the report towards the IRS, based on that indication.

**PLEASE NOTE.** Because CRS requires per Body besides one ReportingFI one ReportingGroup as well, while FATCA allows several ReportingGroups, the choice was made in the FATCA CRS ESRR report for data supply between financial institutions and the Inspectorate, to depart from the most limited report: **per Body** always **one ReportingFI** and also **one ReportingGroup**. The FATCA CRS report allows several Bodies. If there is a blank data supply, then the bodies of that report shall be filled with ReportingFI and ReportingGroup with therein a NilReport (MessageTypeIndic in the messageheader = CRS703).

Financial institutions in Curaçao (CRIB-number of financial institution without registration at the IRS or with registration at the IRS as Leader, Single or Branch in SendingCompanyIN in the Messageheader) or Sponsors in Curaçao (received number upon registration PFGU in SendingCompanyIN in the Messageheader) supply data about US-persons and about persons that have a 'jurisdiction of residence' in MCAA-countries.

Financial institutions supply for themselves and for Reporting FI's located in Curaçao within their organization (indicated through GIIN-code (in case of an FFI) or CRIB number in the Reporting FI in the bodies of the report). Sponsors supply for FFI's (as ReportingFI's). International data supply departs from the initial supply (new) and supplies with withdrawal (void followed by new) of (parts of) data supply or correction (corrected or amended) of (parts of) data supply, where the data supply (on report level) are indicated with MessageRefId and CorrMessageRefId and within the report, the corrected, deleted or modified parts of the report are indicated with DocRefId and CorrDocRefId.

Correction, removal or modification is possible for the following parts of the report:

- **Reporting FI** in IRS-terms these are the FFI's and within ReportingGroup for the datagroups:
- **Sponsor** only used for FATCA (0,1)
- **NilReport** used for FATCA and CRS (1..1)
- **AccountReport** used for FATCA and CRS (1..N)

Sponsor is optional and (one of the two is mandatory) or NilReport or AccountReport(s).

#### Blank data supply with FATCA CRS XML report schedule version 2.0

According to the FATCA CRS XML report schedule version 2.0 ReportingGroup, besides optional a Sponsor, consists of either a NilReport or AccountReport(s). One of the two shall be mandatory. In the MessageHeader the indicator MessageTypeIndic indicates if the report contains new data (CRS701) or corrections (CRS702) or blank data supplies (CRS703). For the supplies from fiscal year 2016, this means the following:

- For supplies with ReportingFI's for which a **BLANK DATA supply** is made, the following shall apply:
  - in the MessageHeader, MessageTypeIndic has the value CRS703
  - ReportingGroup contains a NilReport and a Sponsor if ReportingFI has a Sponsor
- For supplies with ReportingFI's for which a **DATA supply** is made, the following shall apply:
  - in the MessageHeader, MessageTypeIndic has the value CRS701 (new) or value CRS702 (correction)
  - ReportingGroup contains one or more AccountReport(s) and a Sponsor if ReportingFI has a Sponsor

PFGU takes care of reports with NilReports (without MessageTypeIndic) in accordance with FATCA XML schedule version 2.0 to IRS (also if the ReportingFI did not report US-persons with more than \$ 50.000 as Account balance) and for reports with blank data supplies (with MessageTypeIndic=CRS703 and without NilReports) to MCAA-countries in accordance with CRS XML schema version 1.0.

### 6.1. Type of report and version data supply

The report starts with a fixed element, which indicates what type of report it is. Furthermore, it contains a version indication of the version of the FATCA CRS XML report schedule that the financial institution used to make the report. On an annual basis, the Inspectorate shall make sure that the FATCA CRS XML report schedule 'fits' with the XML report schedules that are used for the FATCA and CRS.

As from fiscal year 2016, the following XML report schedules shall be used:

- FATCA CRS XML report schedule version 2.0 for the supply of data by financial institutions and Sponsors to the Inspectorate;
- and:
- FATCA XML report schedule version 2.0 for the provision by the Inspectorate to the USA (IRS);
  - CRS XML report schedule version 1.0 for the provision to MCAA-countries.

<b>Data name</b>	<b>FATCA_CRS</b>
Xpath (XML)	FATCA_CRS
Description	Fixed text to indicate type of data supply
Conditions	Mandatory
Explanation	Standard text is 'FATCA_CRS' for data supplies in the framework of FATCA and CRS.
Cardinality	1..1
Format	xsd:string
Domain	Validation on 'FATCA_CRS'

<b>Data name</b>	<b>Version</b>
Xpath (XML)	FATCA_CRS@Version
Description	Version of the FATCA CRS XML report schedule
Conditions	Mandatory
Explanation	<p>The version of the XML schedule depends on the fiscal year. For fiscal year 2016 version <b>2.0</b> of the FATCA CRS XML report schedule shall apply.</p> <p>If a financial institution supplies according to a wrong version, then the financial institution shall get a notification to supply again, but then according to the applicable XML report schedule.</p>
Cardinality	1..1
Format	xsd:string
Domain	Validation version number in relation to applicable version number of receipt for the relevant fiscal year

## 6.2. Messageheader (logistical data of the report)

The Messageheader consists of some logistical data and unique identification data.

<b>Data name</b>	<b>MessageHeader – SendingCompanyIN</b>
Xpath (XML)	FATCA_CRS/MessageHeader/SendingCompanyIN
Description	CRIB-number of the supplying financial institution and for Sponsors of the number that was received upon registration in the PFGU
Conditions	Mandatory
Explanation	<p>For the data supply FATCA-CRS, a financial institution shall supply for itself and if necessary for a few Reporting FI's (these are the foreign financial institutions in case of the FATCA), financial data to the Inspectorate, where the data is selected and collected to provide to:</p> <ul style="list-style-type: none"> <li>• The USA (IRS) for the FATCA – as from fiscal year 2014</li> <li>• MCAA-countries for the CRS – as from fiscal year 2016</li> </ul> <p>A Sponsor supplies in the framework of the FATCA for other FFI's and is registered as Sponsor with the IRS.</p>



Cardinality	1..1
Format	xsd:stringMax200
Domain	Validation on existing CRIB-number or code for Sponsors issued by PFGU (both are well below 200 characters)

<b>Data name</b>	<b>MessageHeader – TransmittingCountry</b>
Xpath (XML)	FATCA_CRS/MessageHeader/TransmittingCountry
Description	Country code of Curaçao (CW) in accordance with ISO standard for Country-Code-Type
Conditions	Completed with 'CW' and it shall be mandatory
Explanation	Data are from a financial institution located in Curaçao
Cardinality	1..1
Format	xsd:string (2 positions)
Domain	Validation on presence of 'CW'

<b>Data name</b>	<b>MessageHeader – ReceivingCountry</b>
Xpath (XML)	FATCA_CRS/MessageHeader/ReceivingCountry
Description	Country code of Curaçao (CW) in accordance with ISO standard for Country-Code-Type
Conditions	Completed with 'CW' and it shall be mandatory
Explanation	Financial institution supplies to the Inspectorate and thus Curaçao. (in reports to the USA and MCAA-countries, this field shows the country that is supplied to)
Cardinality	1..1
Format	xsd:string (2 positions)
Domain	Validation on presence of 'CW'

<b>Data name</b>	<b>MessageHeader – MessageType</b>
Xpath (XML)	FATCA_CRS/MessageHeader/MessageType
Description	Contains fixed text 'FATCA-CRS'
Conditions	Completed with 'FATCA-CRS' and it shall be mandatory
Explanation	Fixed text
Cardinality	1..1
Format	xsd:string (fixed value 'FATCA-CRS')
Domain	Validation on presence of 'FATCA-CRS'

<b>Data name</b>	<b>MessageHeader – Warning</b>
Xpath (XML)	FATCA_CRS/MessageHeader/Warning
Description	Warning related to the contents of the data supply
Conditions	Optional
Explanation	Can f.i. be used to indicate that for this data supply as a whole, the <b>ReportingPeriod</b> is not 12 months but only 10 months.
Cardinality	0..1
Format	xsd:stringMax4000
Domain	Maximum length 4000 characters

<b>Data name</b>	<b>MessageHeader – Contact</b>
Xpath (XML)	FATCA_CRS/MessageHeader/Contact
Description	Contact data for the data supply
Conditions	Optional
Explanation	Can be used by the supplying financial institution to let it be recorded at the Inspectorate what the contact data are for the relevant data supply as a whole. This information shall <b>not</b> be passed on to the IRS (FATCA) and neither to MCAA-countries
Cardinality	0..1

Format	xsd:stringMax200
Domain	Maximum length 200 characters

<b>Data name</b>	<b>MessageHeader – MessageRefId</b>
Xpath (XML)	FATCA_CRS/MessageHeader/MessageRefId
Description	Unique identification of the report
Conditions	Mandatory
Explanation	The unique MessageRefId is created by the supplying financial institution. An example could be <b>CW2016(CRIB-number)123456789</b> . Instead of the CRIB-number, Sponsors use the number that they have received upon registration in the PFGU.
Cardinality	1..1
Format	xsd:string
Domain	The first six characters have to be equal to 'CW' followed by the fiscal year (JJJJ) for which the data in the report are applicable. So, for fiscal year 2016 it is 'CW2016'. Subsequently, the CRIB-number of the supplying financial institution should be included followed by the identification of the report as such. Instead of the CRIB-number, Sponsors use the number that they have received upon registration in the PFGU.  Should not have spaces and should not be more than 200 characters.

<b>Data name</b>	<b>MessageHeader – MessageTypeIndic</b>
Xpath (XML)	FATCA_CRS/MessageHeader/MessageTypeIndic
Description	Indicates what type of data supply the report as a whole is: <ul style="list-style-type: none"> <li>only new data (CRS701)</li> <li>only corrections, removals and modifications of datagroups (CRS702)</li> <li>only blank data supplies (CRS703).</li> </ul>
Conditions	Mandatory
Explanation	A Mandatory element, by means of which, at the same time, the completeness of supply by the financial institution can also be monitored. Possible values are: <ul style="list-style-type: none"> <li><b>CRS701</b> report contains only new data</li> <li><b>CRS702</b> report contains only corrections of previously sent information</li> <li><b>CRS703</b> report contains <b>reporting FI's</b> without data</li> </ul> <p>The characterization applies to the entire report (which at the same time means that for several Reporting FI's in the report, either only new data or only corrected data or only 'blank data supplies' can be supplied):</p> <ul style="list-style-type: none"> <li>in case of new data or corrections, ReportingGroup is completed with one or more AccountReports and if applicable a Sponsor</li> <li>in case of blank data supply, ReportingGroup is completed with a NilReport and if applicable a Sponsor</li> </ul>
Cardinality	1..1
Format	xsd:string (with a value range as indicated at Domain)
Domain	The values are: CRS701, CRS702, CRS703.

<b>Data name</b>	<b>MessageHeader – CorrMessageRefId</b>
Xpath (XML)	FATCA_CRS/MessageHeader/CorrMessageRefId
Description	Unique identification of the report, that gets withdrawn or corrected or of which parts get withdrawn or corrected.
Conditions	<a href="#">Mandatory in case of MessageIndicType = CRS702 and optional if MessageIndicType = CRS703 and not allowed if MessageIndicType = CRS701</a>
Explanation	Unique ID was (previously) issued by the supplying financial institution
Cardinality	0..1
Format	xsd:string

Domain	<p>The first six characters have to be equal to 'CW' followed by the fiscal year (JJJJ) for which the data in the report are applicable. So, for fiscal year 2016 it is 'CW2016'. Subsequently, the CRIB-number of the supplying financial institution should be included followed by the identification of the report as such. Instead of the CRIB-number, Sponsors use the number that they have received upon registration in the PFGU.</p> <p>Should not have spaces and should not be more than 200 characters.</p>
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<b>Data name</b>	<b>MessageHeader – ReportingPeriod</b>
Xpath (XML)	FATCA_CRS/MessageHeader/ReportingPeriod
Description	Indication of the period being reported
Conditions	Mandatory
Explanation	A year is represented by means of the final date. For fiscal year 2016 ReportingPeriod is equal to 2016-12-31.
Cardinality	1..1
Format	JJJJ-MM-DD
Domain	n/a

<b>Data name</b>	<b>MessageHeader – TimeStamp</b>
Xpath (XML)	FATCA_CRS/MessageHeader/Timestamp
Description	Time at which the report was sent to the Inspectorate by the supplying financial institution.
Conditions	Mandatory
Explanation	Sent on 22 August 2017 at 9.45 hours and 30 seconds is represented by: <b>2017-08-22T09:45:30</b>
Cardinality	1..1
Format	JJJJ-MM-DD'T'hh:mm:ss
Domain	not applicable

### 6.3. MessageBody

A report contains one or more MessageBodies. A MessageBody consists of a combination <sup>3</sup> of Reporting FI and Reporting Group. If a financial institution reports for more than one ReportingFI, then the report shall have to contain more than one MessageBody. For each ReportingFI an own MessageBody.

A ReportingGroup consists of Sponsor and (AccountReport(s) of NilReport), at which Sponsor is only available if there is supply of data for an FFI (ReportingFI) by a Sponsor (this can only be the case if the FFI (ReportingFI) has US-persons as accountholders). The ReportingGroup consists of :

- Sponsor appears optionally (0 or 1 time)  
and or data supply (new or correction):
- AccountReport appears 1 or more times (in case of new data or corrections)  
or blank data supply:
- NilReport appears 1 time (in case of blank data supply)

**PLEASE NOTE** As from fiscal year 2016, in case of 'no supply' for one or more ReportingFI's, the MessageBody shall be supplied with a completed ReportingFI and with a ReportingGroup Completed with a NilReport and a Sponsor if applicable.

<sup>3</sup> For CRS only one ReportingGroup with one ReportingFI; for FATCA it can be more than one ReportingGroup at a ReportingFI. Because financial institutions supply for FATCA-CRS, it has been decided to follow the line of CRS and to allow only one Reportinggroup at a ReportingFI.

The MessageHeader then has in MessageTypeIndic, the code CRS703 (see introduction chapter 6).

### 6.3.1. ReportingFI

For this part of the report it is new, corrected or deleted and it therefore has a DocSpec part on ReportingFI-level in order to identify the part as unique and if necessary refer back to the ReportingFI from a previous report to be corrected. Upon correction, the entire ReportingFI shall be delivered again, including the data that were not modified.

#### 6.3.1.1. ReportingFI – the data

A ReportingFI is the unit for which a report is presented. For financial institutions with US-persons as accountholders, the units being reported on correspond to the Foreign Financial Institutions (FFI's) that are registered with the IRS and the FFI's are the ReportingFI's. CRS does not know the concept FFI. In terms of the CRS, ReportingFI is a reporting unit and it shall be up to the financial institution if they will make a subdivision according to ReportingFI's or supply at once in which the financial institution itself is the ReportingFI. A ReportingFI as datagroup consists of:

- **ResCountryCode**
- **TIN** (identification Number) consisting of :
  - the identification as such,
  - IssuedBy
- **Name or names** of the ReportingFI (at least one name shall be mandatory and several names shall be possible) consisting of :
  - the name as such
  - a type indication of that name
- **Address(es)** of the ReportingFI (at least one and several shall be possible) consisting of :
  - the country code
  - a type indication of the address
  - the address as such
    - in a fixed format (optionally supplemented with AddressFree for supplementation) with the following attributes:
      - street
      - building identifier
      - suite identifier
      - floor identifier
      - district name
      - p.o. box
      - postal code
      - city
      - country subentity
    - or free format (AddressFree)
      - the Address as xsd:string

Data name	MessageBody - ReportingFI – ResCountryCode
Xpath (XML)	FATCA_CRS/MessageBody/ReportingFI/ResCountryCode
Description	The country code of the 'tax residence' of the ReportingFI.
Conditions	Mandatory completed with 'CW'
Explanation	In accordance with FATCA CRS agreements, ReportingFI's get reported from the tax residence of the relevant ReportingFI. For that reason, ResCountryCode shall always be

	equal to 'CW'. If it is a different country, then the ReportingFI should report from that other country (see "FATCA/CRS-agreements for supply of data" in paragraph 1.1)
Cardinality	1..1
Format	xsd:string (2 positions)
Domain	Fixed value is 'CW'

<b>Data name</b>	<b>MessageBody - ReportingFI – TIN</b>
Xpath (XML)	FATCA_CRS/ MessageBody/ReportingFI/TIN
Description	Identification of the ReportingFI (through TIN@Issued_By it is indicated for what country)
Conditions	Mandatory: <ul style="list-style-type: none"> <li>for an FFI as ReportingFI, the TIN is equal to the GIIN received from the IRS (the ReportingFI has US-persons as accountholder, which will be reported on)</li> <li>for the remaining ReportingFI's, the TIN is equal to the CRIB number of the financial institution</li> </ul>
Explanation	This element is the identification number (TIN), as used by the sending and/or receiving 'tax administration': <ul style="list-style-type: none"> <li>for CRS the sending 'tax administration' shall determine the identification number: CRIB-number of the financial institution in Curaçao.</li> <li>for FATCA, the IRS (the receiving 'tax administration') has determined the identification number of the ReportingFI (being an FFI): the GIIN under which the FFI is registered with the IRS.</li> </ul> Because FFI's can also have accountholders, that have an MCAA-country as jurisdiction of residence, it shall be that to that MCAA-country which has accountholder as ReportingFI shall have the relevant FFI (and thus as TIN the GIIN of the IRS).
Cardinality	1..1 (according to the FATCA CRS XML schema 0..N, but the context check requires 1..1)
Format	xsd:stringMax200
Domain	Has to comply with the format of the TIN in the country in IssuedBy and shall not be allowed to have more than 200 characters.

<b>Data name</b>	<b>MessageBody - ReportingFI – TIN – IssuedBy</b>
Xpath (XML)	FATCA_CRS/ MessageBody/ReportingFI/TIN@IssuedBy
Description	Description of the 'jurisdiction' that issued the TIN
Conditions	Mandatory if TIN is completed
Explanation	It is the country code of the country where the TIN was issued. <ul style="list-style-type: none"> <li>if a ReportingFI is an FFI, then TIN@IssuedBy shall be equal to US and the TIN shall be equal to the GIIN of the FFI.</li> <li>for remaining ReportingFI's, TIN@IssuedBy shall be equal to 'CW' (the CRIB-number was issued by the Inspectorate in Curaçao)</li> </ul>
Cardinality	1..1 (Mandatory if TIN is filled in; otherwise not available)
Format	xsd:string (2 positions)
Domain	Country code has to comply with ISO-3166-1

In XML report schedule FATCA CRS version 2.0, the TIN-attribute INType is still not included in OrganizationParty\_Type. In the CRS report schedule, INType appears as Optional attribute of IN.

For a ReportingFI, one name shall be mandatory and several names are possible.  
The following elements form the **name** of a ReportingFI.

<b>Data name</b>	<b>MessageBody - ReportingFI – Name</b>
Xpath (XML)	FATCA_CRS/ MessageBody/ReportingFI/Name/Name
Description	The legal name of the ReportingFI

	If the ReportingFI is an FFI, then this name should be equal to the name that was registered at the IRS for the FFI.
Conditions	Mandatory
Explanation	None
Cardinality	1..N
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingFI – Name – NameType</b>
Xpath (XML)	FATCA_CRS/ MessageBody/ReportingFI/Name@NameType
Description	Characterization of the name of the ReportingFI (not used in the FATCA-CRS report)
Conditions	Mandatory
Explanation	<p>Element is used for CRS and as from fiscal year 2016 also by FATCA. OECD201 is reserved for SMFAliasOrOther and shall not be used. The following name types are identified:</p> <ul style="list-style-type: none"> <li>• <b>OECD202</b> = individual</li> <li>• <b>OECD203</b> = alias</li> <li>• <b>OECD204</b> = nick (nickname)</li> <li>• <b>OECD205</b> = AKA (also known as)</li> <li>• <b>OECD206</b> = DBA (doing business as)</li> <li>• <b>OECD207</b> = legal</li> <li>• <b>OECD208</b> = name at birth</li> </ul>
Cardinality	1..1
Format	xsd:string (with a value range as indicated at Domain)
Domain	Values are: OECD202, OECD203, OECD204, OECD205, OECD206, OECD207, OECD208

The following elements form the address of the ReportingFI, which can be supplied in two ways (for CRS, AddressFix has to be used and one can change to AddressFree if the various elements from AddressFix cannot be supplied for the ReportingFI).

A minimum of one address should be supplied and several addresses are possible. An address is supplied:

- as AddressFix (the address is then shown in a number of elements) with optional use of AddressFree as a supplementation to the AddressFix elements
- as AddressFree (free text in one element)

In both cases, the address should have a country code (CountryCode) and address type (AddressType).

<b>Data name</b>	<b>MessageBody - ReportingFI – Address – AddressType</b>
Xpath (XML)	FATCA_CRS/ MessageBody/ReportingFI/Address@AddressType
Description	This element indicates what type of address, the address of the ReportingFI is.
Conditions	Optional
Explanation	<p>CRS identifies a few address types, namely:</p> <ul style="list-style-type: none"> <li>• <b>OECD301</b> = residential or business</li> <li>• <b>OECD302</b> = residential</li> <li>• <b>OECD303</b> = business</li> <li>• <b>OECD304</b> = registered office</li> <li>• <b>OECD305</b> = unspecified</li> </ul>
Cardinality	0..1
Format	xsd:string (one of the values from Domain)
Domain	The values are: OECD301, OECD302, OECD303, OECD304, OECD305.

Data name	MessageBody - ReportingFI – Address – CountryCode
Xpath (XML)	FATCA_CRS/ MessageBody/ReportingFI/Address/CountryCode
Description	The country code of the country where the ReportingFI is located
Conditions	Mandatory
Explanation	This is for FATCA-CRS reports, for ReportingFI's in Curaçao always 'CW' These are ReportingFI's that are located in Curaçao.
Cardinality	1..1
Format	xsd:string (always completed with 'CW')
Domain	Fixed value is 'CW'

**Elements from AddressFix** are Street, BuildingIdentifier, SuiteIdentifier, FloorIdentifier, DistrictName, POB, Postal code, City and CountrySubentity Optional with AddressFree for supplementary information. CRS prefers addresses in the form of an AddressFix representation. Only if there is no other option, then an address in AddressFree representation shall be allowed.

Data name	MessageBody - ReportingFI – Address - AddressFix – Street
Xpath (XML)	FATCA_CRS/ MessageBody/ReportingFI/Address/AddressFix/Street
Description	Street name of the address of the ReportingFI
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

Data name	MessageBody - ReportingFI – Address - AddressFix – BuildingIdentifier
Xpath (XML)	FATCA_CRS/ MessageBody/ReportingFI/Address/AddressFix/BuildingIdentifier
Description	Building identifier, if applicable in the address of the ReportingFI
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

Data name	MessageBody - ReportingFI – Address - AddressFix – SuiteIdentifier
Xpath (XML)	FATCA_CRS/ MessageBody/ReportingFI/Address/AddressFix/SuiteIdentifier
Description	Suite identifier, if applicable in the address of the ReportingFI
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

Data name	MessageBody - ReportingFI – Address - AddressFix – FloorIdentifier
Xpath (XML)	FATCA_CRS/ MessageBody/ReportingFI/Address/AddressFix/FloorIdentifier
Description	Floor identifier, if applicable in the address of the ReportingFI
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

Data name	MessageBody - ReportingFI – Address - AddressFix – Districtname
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Xpath (XML)	FATCA_CRS/ MessageBody/ReportingFI/Address/AddressFix/DistrictName
Description	Name of the district, if applicable in the address of the ReportingFI
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingFI – Address - AddressFix – POB</b>
Xpath (XML)	FATCA_CRS/ MessageBody/ReportingFI/Address/AddressFix/POB
Description	P.O. Box number, if applicable in the address of the ReportingFI
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingFI – Address - AddressFix – Postal code</b>
Xpath (XML)	FATCA_CRS/ MessageBody/ReportingFI/Address/AddressFix/Postal code
Description	Postal code, if applicable in the address of the ReportingFI
Conditions	Optional
Explanation	In Curaçao, we don't use postal codes. So, this element shall be blank.
Cardinality	0..1 (in Curaçao, we don't use postal codes)
Format	xsd:string (empty)
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingFI – Address - AddressFix – City</b>
Xpath (XML)	FATCA_CRS/ MessageBody/ReportingFI/Address/AddressFix/City
Description	City in the address of the ReportingFI
Conditions	Mandatory
Explanation	The City shall be mandatory and is used for validation
Cardinality	1..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingFI – Address - AddressFix – CountrySubentity</b>
Xpath (XML)	FATCA_CRS/ MessageBody/ReportingFI/Address/AddressFix/CountrySubentity
Description	Country subentity, if applicable in the address of the ReportingFI
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

**AddressFree** consists of one element (xsd:string). CRS prefers addresses in the form of an AddressFix representation. Only if there is no other option, then an address in AddressFree representation shall be allowed.

<b>Data name</b>	<b>MessageBody - ReportingFI – Address – AddressFree</b>
Xpath (XML)	FATCA_CRS/ MessageBody/ReportingFI/Address/AddressFree
Description	Free text description of the address.
Conditions	Optional



Explanation	<ul style="list-style-type: none"> <li>Only to be used if elements from AddressFix cannot be supplied for the address of the ReportingFI (CRS departs from addresses in AddressFix representation).</li> <li>Or to be used optionally as a supplementation to the data in the AddressFix Format. AddressFree can have a maximum length of 4000 characters.</li> </ul>
Cardinality	0..1
Format	xsd:stringMax4000
Domain	A maximum of 4000 characters

### 6.3.1.2. ReportingFI – FilerCategory and DocSpec

As from fiscal year 2016, the ‘document specification’ part has been extended with the field **FilerCategory** (Characterization of ReportingFI in terms of submission of data). This is a result of FATCA XML report schedule 2.0, in which FilerCategory was introduced at ReportingFI.

<b>Data name</b>	<b>MessageBody - ReportingFI – FilerCategory</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingFI/FilersCategory
Description	Characterization of ReportingFI's in terms of submission of data('filer category'). This field is only used for FATCA and thus only if the ReportingFI is an FFI.
Conditions	Optional
Explanation	<p>FATCA CRS recognizes a few FilerCategory values for ReportingFI, namely:</p> <ul style="list-style-type: none"> <li><b>FATCA601</b> = PFFI (other than a Reporting Model 2 FFI and including a U.S. branch of a PFFI not treated as a U.S. person)</li> <li><b>FATCA602</b> = 'RDC FFI'</li> <li><b>FATCA603</b> = 'limited Branch' or 'limited FFI'</li> <li><b>FATCA605</b> if the FFI is one of the following types: <ul style="list-style-type: none"> <li>'Qualified Intermediary (QI)'</li> <li>'Withholding Foreign Partnership' (WP)</li> <li>'Withholding Foreign Trust' (WT)</li> </ul> </li> <li><b>FATCA606</b> = 'Direct Reporting NFFE'</li> <li><b>FATCA610</b> if the FFI is one of the following types<sup>4</sup>: <ul style="list-style-type: none"> <li>'Withholding Agent (including a U.S. branch or a PFFI)',</li> <li>'Reporting Model 1 FFI'</li> <li>'RDC FFI treated as a U.S. person'</li> <li>'a U.S. branch or a Reporting Model 1 FFI (including any other RDC FFI)'</li> <li>'limited FFI that is not treated as a U.S. person'</li> </ul> </li> </ul> <p>For FFI's as ReportingFI this field shall be <u>mandatory</u> if the FFI is <u>not</u>:</p> <ul style="list-style-type: none"> <li>- an FFI with a Sponsor,</li> <li>- a directly reporting NFFE with a Sponsor,</li> <li>- a 'trustee documented' trust.</li> </ul> <p>For FFI's as ReportingFI this field shall <u>not be allowed</u> if the FFI is:</p> <ul style="list-style-type: none"> <li>- an FFI with a Sponsor,</li> <li>- a directly reporting NFFE with a Sponsor,</li> <li>- a 'trustee documented' trust.</li> </ul>
Cardinality	0..1
Format	xsd:string (one of the values from Domain)
Domain	The values are: FATCA601, FATCA602, FATCA603, FATCA605, FATCA606, FATCA610

<sup>4</sup> Reporting Model 2 FFI also belongs to the list of FATCA610. This type of FFI as ReportingFI does not appear in Curaçao because this is a matter of data exchange with the IRS according to IGA Model 1.

**DocSpec** contains the unique identification for the datagroup ReportingFI and contains, in case of supply of corrections in the datagroup ReportingFI, a reference to the unique identification of the supply of ReportingFI data that gets corrected by means of the data in this report (supplied again).

**DocSpec consists of** : DocTypeIndic, DocRefId and in case of a correction also CorrDocRefId.

Data name	MessageBody - ReportingFI – DocSpec - DocTypeIndic
Xpath (XML)	FATCA_CRS/ MessageBody/ReportingFI/DocSpec/DocTypeIndic
Description	Characterization of the ReportingFI data (new, correction, removal)
Conditions	Mandatory
Explanation	<p>CRS identifies a number of DocTypeIndic values, namely:</p> <ul style="list-style-type: none"> <li>• <b>OECD1</b> = new data</li> <li>• <b>OECD2</b> = corrected data</li> <li>• <b>OECD3</b> = deleted data</li> </ul> <p>And when testing the data supply:</p> <ul style="list-style-type: none"> <li>• <b>OECD11</b> = new test data</li> <li>• <b>OECD12</b> = corrected test data</li> <li>• <b>OECD13</b> = deleted test data</li> </ul> <p>Prior to the release of the PFGU for a certain fiscal year, only the DocTypeIndic codes OECD11, OECD12 and OECD13 shall be allowed (these are test supplies). From the moment of release of the PFGU for a certain fiscal year, only the DocTypeIndic codes OECD1, OECD2 and OECD3 shall be allowed (these are production supplies).</p> <p><b>PLEASE NOTE</b> A FATCA-CRS report with for a ReportingFI a DocSpec with DocTypeIndic = OECD3 shall always be followed by a FATCA-CRS report with for the same ReportingFI a DocSpec with DocTypeIndic = OECD1 (in case of testing, it is OECD13 followed by OECD11).</p>
Cardinality	1..1
Format	xsd:string (one of the values from Domain)
Domain	The values are: OECD1, OECD2, OECD3, OECD11, OECD12, OECD13

Data name	MessageBody - ReportingFI – DocSpec - DocRefId
Xpath (XML)	FATCA_CRS/ MessageBody/ReportingFI/DocSpec/DocRefId
Description	Unique indication of the datagroup ReportingFI in the FATCA-CRS report.
Conditions	Mandatory
Explanation	The report consists of parts (datagroup). If a part is correctable, then it has a DocRefId. The supplying financial institution shall create the DocRefId.
Cardinality	1..1
Format	xsd:stringMax200
Domain	<p>The first six characters have to be equal to 'CW' followed by the fiscal year (JJJJ) for which the data in the report are applicable. So, for fiscal year 2016 it is 'CW2016'. Subsequently, the CRIB-number of the supplying financial institution should be included followed by the identification of the report as such. Instead of the CRIB-number, Sponsors use the number that they have received upon registration in the PFGU.</p> <p>Should not have spaces and should not be more than 200 characters.</p>

Data name	MessageBody - ReportingFI – DocSpec - CorrDocRefId
Xpath (XML)	FATCA_CRS/ MessageBody/ReportingFI/DocSpec/CorrDocRefId

Description	If there is a correction, removal or modification of ReportingFI data from a previous report, then CorrDocRefId shall refer to the DocRefId of the datagroup ReportingFI, that the correction or removal is related to.
Conditions	Mandatory in case of correction or removal
Explanation	CorrDocRefId is a DocRefId that was previously created by the supplying financial institution.
Cardinality	0..1 (mandatory in case of correction or removal)
Format	xsd:stringMax200
Domain	The first six characters have to be equal to 'CW' followed by the fiscal year (JJJJ) for which the data in the report are applicable. So, for fiscal year 2016 it is 'CW2016'. Subsequently, the CRIB-number of the supplying financial institution should be included followed by the identification of the report as such. Instead of the CRIB-number, Sponsors use the number that they have received upon registration in the PFGU.  Should not have spaces and should not be more than 200 characters.

### 6.3.2. ReportingGroup

ReportingGroup consists, since fiscal year 2016, of datagroups Sponsor, NilReport and AccountReport. Sponsor is only important for FATCA and is optional.

A FATCA CRS report contains one or several MessageBody's. In MessageBody there is only one ReportingFI and one ReportingGroup. ReportingGroup consists of **either** a NilReport **or** AccountReports (one or more) **and in both cases possible** Sponsor data.

#### 6.3.2.1. Sponsor

Sponsor is only important for FATCA-supplies to the IRS. So, Sponsor-data are not supplied, if the ReportingFI does not have AccountReports for US-persons. It is allowed for the Sponsor to supply data about accountholders who have an MCAA-country as jurisdiction of residence. PFGU provides this data without Sponsor data to the relevant MCAA-country with the relevant FFI as ReportingFI.

Within one ReportingGroup, a Sponsor can appear 0 or 1 time. A Sponsor is registered with the IRS and has a GIIN with SP.531 at the end. A Sponsor acts on behalf of an FFI or a number of FFI's and takes care of the data supply to the Inspectorate for this FFI or these FFI's. In case of a blank data supply by a Sponsor for a ReportingFI, ReportingGroup is a NilReport and the Sponsor.

For Sponsor as part of a ReportingGroup, new, corrected or deleted shall be possible and therefore has a DocSpec part on Sponsor-level in order to uniquely identify the part and if necessary refer back to the Sponsor to be corrected from a previous report. In case of correction, the Sponsor shall fully be supplied again, including the data that was not changed. In case of removal it shall be sufficient to remove the DocSpec and a supply of Sponsor data shall follow or the DocTypeIndic=OECD1 (in case of real data) or OECD11 (in case of test data).

##### 6.3.2.1.1. Sponsor – the data

A Sponsor as datagroup consists of:

- **ResCountryCode**
- **TIN** (Identification Number) consisting of :
  - the identification as such,

- IssuedBy
- **Name or names** of the Sponsor (at least one name shall be mandatory and several names are possible) consisting of :
  - the name as such
  - a type indication of that name
- **Address(es)** of the Sponsor (at least one and several are possible) consisting of :
  - the country code
  - a type indication of the address
  - the address as such
    - in a fixed format (optionally supplemented with AddressFree as a supplementation) with the following attributes:
      - street
      - building identifier
      - suite identifier
      - floor identifier
      - district name
      - P.O. Box
      - Postal code
      - city
      - country subentity
    - or free format (AddressFree)
      - the address as xsd:stringMax4000

Data name	MessageBody - ReportingGroup – Sponsor – ResCountryCode
Xpath (XML)	FATCA_CRS/ MessageBody/ReportingGroup/Sponsor/ResCountryCode
Description	The country code of the 'tax residence' of the Sponsor.
Conditions	Should comply with the ISO-3166-1 standard
Explanation	Sponsor can only be used if there is a report about AccountHolders who are US-persons (Sponsor shall only be used for FATCA).  Sponsor is only filled in if there is/are one or more AccountReports with data for US-persons and if the ReportingFI uses a Third Party, being the Sponsor.
Cardinality	1..1
Format	xsd:string (2 positions) and should comply with the ISO-3166-1 standard
Domain	Values according to the ISO-3166-1 standard

Data name	MessageBody - ReportingGroup – Sponsor – TIN
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/Sponsor/TIN
Description	GIIN-code of the Sponsor, which was obtained at the IRS to be able to act as Sponsor. Sponsor shall only appear if there is a supply of FATCA-data
Conditions	Mandatory if Sponsor appears  The XML schedule does not allow one or more TIN, but the validation upon receipt in the PFGU expected with a Sponsor – TIN the GIIN (one TIN) as the Sponsor obtained at the IRS.
Explanation	See Description
Cardinality	1..1 (if there is a Sponsor)
Format	xsd:stringMax200
Domain	Validation on correct GIIN

Data name	MessageBody - ReportingGroup – Sponsor - TIN – IssuedBy
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/Sponsor/TIN@IssuedBy
Description	Description of the 'jurisdiction' that issued the TIN
Conditions	Mandatory if TIN is completed
Explanation	Sponsor shall only be identified as such by the FATCA, so if TIN is filled in then TIN_IssuedBy is equal to 'US'.
Cardinality	1..1 (mandatorily filled in if TIN is filled in; otherwise not available)
Format	xsd:string (2 positions)
Domain	Country code has to comply with ISO-3166-1 (due to the definition of Sponsor, always equal to 'US')

In the XML report schedule FATCA CRS ESRR the TIN-attribute INType is still not included at OrganizationParty\_Type. In the CRS report schedule, INType appears as an optional attribute of IN.

For a Sponsor, one name shall be mandatory and several names shall be possible.  
The following elements form the **name** of a Sponsor.

Data name	MessageBody - ReportingGroup - Sponsor – Name
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/Sponsor/Name
Description	The legal name of the Sponsor. This name should be equal to the name that was registered at the IRS for the Sponsor
Conditions	Mandatory
Explanation	None
Cardinality	1..N
Format	xsd:stringMax200
Domain	A maximum of 200 characters

Data name	MessageBody - ReportingGroup – Sponsor – Name – NameType
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/Sponsor/Name@NameType
Description	Characterization of the Name of the Sponsor
Conditions	Optional
Explanation	Element is also used since fiscal year 2016 by FATCA and is available in Sponsor. OECD201 is reserved for SMFAliasOrOther and is not used. The follow name types are identified: <ul style="list-style-type: none"> <li>• <b>OECD202</b> = individual</li> <li>• <b>OECD203</b> = alias</li> <li>• <b>OECD204</b> = nick (nickname)</li> <li>• <b>OECD205</b> = AKA (also known as)</li> <li>• <b>OECD206</b> = DBA (doing business as)</li> <li>• <b>OECD207</b> = legal</li> <li>• <b>OECD208</b> = name at birth</li> </ul>
Cardinality	0..1
Format	xsd:string
Domain	Values are: OECD202, OECD203, OECD204, OECD205, OECD206, OECD207, OECD208

A minimum of one address has to be supplied and several addresses are possible. An address is supplied:

- as AddressFix (the address is then represented in a number of elements) with optional use of AddressFree as a supplementation on the AddressFix elements
- as AddressFree (free text in one element)

In both cases, the address should mention the country code (CountryCode) and address type (AddressType).

Data name	MessageBody - ReportingGroup – Sponsor - Address – AddressType
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/Sponsor/Address@AddressType
Description	This element indicates what type of address, the address of the Sponsor is.
Conditions	Optional
Explanation	CRS identifies a few types of address, namely: <ul style="list-style-type: none"> <li>• <b>OECD301</b> = residential or business</li> <li>• <b>OECD302</b> = residential</li> <li>• <b>OECD303</b> = business</li> <li>• <b>OECD304</b> = registered office</li> <li>• <b>OECD305</b> = unspecified</li> </ul>
Cardinality	0..1
Format	xsd:string (one of the values from Domain)
Domain	The values are: OECD301, OECD302, OECD303, OECD304, OECD305.

Data name	MessageBody - ReportingGroup – Sponsor - Address – CountryCode
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/Sponsor/Address/CountryCode
Description	The country code of the country where the Sponsor is located
Conditions	Mandatory (check on appearance in the ISO-3166-1 standard)
Explanation	Country code of the country, where the Sponsor is located (in accordance with ISO-3166-1 standard).
Cardinality	1..1
Format	xsd:string (a value from the ISO-3166-1 standard)
Domain	Value range of ISO-3166-1 standard

**Elements from AddressFix** are Street, BuildingIdentifier, SuiteIdentifier, FloorIdentifier, DistrictName, POB, Postal code, City and CountrySubentity Optional with AddressFree for supplementary information. CRS prefers addresses in the form of an AddressFix representation. Only if there is no other option, then an address in AddressFree representation shall be allowed.

Data name	MessageBody - ReportingGroup – Sponsor - Address – AddressFix – Street
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/Sponsor/Address/AddressFix/Street
Description	Street name of the address of the Sponsor
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

Data name	MessageBody - ReportingGroup – Sponsor – Address – AddressFix – BuildingIdentifier
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/Sponsor/Address/AddressFix/BuildingIdentifier
Description	Building identifier, if applicable in the address of the Sponsor
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

Data name	MessageBody - ReportingGroup – Sponsor – Address – AddressFix - SuiteIdentifier
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/Sponsor/Address/AddressFix/SuiteIdentifier
Description	Suite identifier, if applicable in the address of the Sponsor
Conditions	Optional

Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup - Sponsor – Address – AddressFix - FloorIdentifier</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/Sponsor/Address/AddressFix/FloorIdentifier
Description	Floor identifier, if applicable in the Address of the Sponsor
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup - Sponsor – Address – AddressFix - Districtname</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/Sponsor/Address/AddressFix/DistrictName
Description	District name, if applicable in the address of the Sponsor
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup - Sponsor – Address – AddressFix/POB</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/Sponsor/Address/AddressFix/POB
Description	P.O. Box number, if applicable in the address of the Sponsor
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup - Sponsor – Address – AddressFix - Postal code</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/Sponsor/Address/AddressFix/Postal code
Description	Postal code, if applicable in the address of the Sponsor
Conditions	Optional
Explanation	In Curaçao, we don't use postal codes. If the country of residence is Curaçao, then the Postal code shall be blank.
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup – Sponsor – Address – AddressFix – City</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/Sponsor/Address/AddressFix/City
Description	City in the address of the Sponsor
Conditions	Mandatory
Explanation	The city shall be mandatory and shall be used for validation
Cardinality	1..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup - Sponsor – Address – AddressFix - CountrySubentity</b>
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Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/Sponsor/Address/AddressFix/CountrySubentity
Description	Country subentity, if applicable in the address of the Sponsor
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

**AddressFree** consists of one element (xsd:string).

<b>Data name</b>	<b>MessageBody - ReportingGroup – Sponsor - Address – AddressFree</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/Sponsor/Address/AddressFree
Description	Free text description of the address.
Conditions	Optional
Explanation	<ul style="list-style-type: none"> <li>Only to be used if the elements from AddressFix cannot be supplied for the address of the Sponsor.</li> <li>Or to be used optionally as a supplementation on the data in the AddressFix Format. AddressFree can have a maximum length of 4000 characters.</li> </ul>
Cardinality	0..1
Format	xsd:stringMax4000
Domain	A maximum of 4000 characters

#### 6.3.2.1.2. Sponsor – FilerCategory and DocSpec

As from fiscal year 2016, the 'document specification' part has been extended with the field **FilerCategory** (characterization of Sponsor in terms of data submission). This is a result of FATCA XML report schedule 2.0, in which FilerCategory was introduced at Sponsor.

<b>Data name</b>	<b>MessageBody - ReportingFI – FilerCategory</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingFI/FilersCategory
Description	Characterization of the Sponsor in terms of submission of data ('filer category'). This field is only used for FATCA and is a mandatory field for the Sponsor.
Conditions	Mandatory (the FATCA CRS XML schedule says optional)
Explanation	<p>FATCA CRS identifies a few FilerCategory values for Sponsor, namely:</p> <ul style="list-style-type: none"> <li><b>FATCA607</b> = 'Sponsoring Entity of a Sponsored FFI'</li> <li><b>FATCA608</b> = 'Sponsoring Entity of a Sponsored Direct Reporting NFFE'</li> <li><b>FATCA609</b> = 'Trustee of a Trustee-Documented Trust'</li> </ul> <p>If FilerCategory for Sponsor is not filled in, then upon receipt at the IRS this shall lead to a notification from the IRS.</p>
Cardinality	1..1
Format	xsd:string (one of the values from Domain)
Domain	The values are: FATCA607, FATCA608, FATCA609

**DocSpec** contains the unique identification for the datagroup Sponsor within ReportingGroup and contains, in case of supply of corrections in datagroup Sponsor within ReportingGroup, a reference to the unique identification of the supply of Sponsor data which is corrected by means of the data in this report (supplied again). **DocSpec consists of** : DocTypeIndic, DocRefId and in case of a correction also CorrDocRefId.

<b>Data name</b>	<b>MessageBody - ReportingGroup – Sponsor – DocSpec - DocTypeIndic</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/Sponsor/DocSpec/DocTypeIndic



Description	Characterization of the Sponsor data (new, correction, removal)
Conditions	Mandatory
Explanation	<p>CRS identifies a few DocTypeIndic values, namely:</p> <ul style="list-style-type: none"> <li>• <b>OECD1</b> = new data</li> <li>• <b>OECD2</b> = corrected data</li> <li>• <b>OECD3</b> = deleted data</li> </ul> <p>And when testing the data supply:</p> <ul style="list-style-type: none"> <li>• <b>OECD11</b> = new test data</li> <li>• <b>OECD12</b> = corrected test data</li> <li>• <b>OECD13</b> = deleted test data</li> </ul> <p>Prior to the release of the PFGU for a certain fiscal year, only the DocTypeIndic codes OECD11, OECD12 and OECD13 shall be allowed (these are test supplies). From the moment of release of the PFGU for a certain fiscal year, only the DocTypeIndic codes OECD1, OECD2 and OECD3 shall be allowed (these are production supplies).</p> <p><b>PLEASE NOTE</b> A FATCA-CRS report with for a Sponsor a DocSpec with DocTypeIndic = OECD3 shall always be followed by a FATCA-CRS report with for the same Sponsor a DocSpec with DocTypeIndic = OECD1 (in case of testing, it is OECD13 followed by OECD11).</p>
Cardinality	1..1
Format	xsd:string (one of the values from Domain)
Domain	The values are: OECD1, OECD2, OECD3, OECD11, OECD12, OECD13

<b>Data name</b>	<b>MessageBody - ReportingGroup – Sponsor – DocSpec - DocRefId</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/Sponsor/DocSpec/DocRefId
Description	Unique Indication of the datagroup Sponsor in the FATCA-CRS report.
Conditions	Mandatory
Explanation	The report consists of parts (datagroup). If a part is correctable, then it has a DocRefId. The supplying financial institution shall create the DocRefId.
Cardinality	1..1
Format	xsd:stringMax200
Domain	<p>The first six characters have to be equal to 'CW' followed by the fiscal year (JJJJ) for which the data in the report are applicable. So, for fiscal year 2016 it is 'CW2016'. Subsequently, the CRIB-number of the supplying financial institution should be included followed by the identification of the report as such. Instead of the CRIB-number, Sponsors use the number that they have received upon registration in the PFGU.</p> <p>Should not have spaces and should not be more than 200 characters.</p>

<b>Data name</b>	<b>MessageBody - ReportingGroup – Sponsor – DocSpec - CorrDocRefId</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/Sponsor/DocSpec/CorrDocRefId
Description	If there is a correction or removal of Sponsor data from a previous report, then CorrDocRefId shall refer to the DocRefId of the datagroup Sponsor within the report, that the correction or removal is related to.
Conditions	Mandatory if there is a correction or removal
Explanation	CorrDocRefId is a DocRefId that was previously created by the supplying financial institution.
Cardinality	0..1 (mandatory in case of correction, removal or modification)
Format	xsd:stringMax200

Domain	<p>The first six characters have to be equal to 'CW' followed by the fiscal year (JJJJ) for which the data in the report are applicable. So, for fiscal year 2016 it is 'CW2016'. Subsequently, the CRIB-number of the supplying financial institution should be included followed by the identification of the report as such. Instead of the CRIB-number, Sponsors use the number that they have received upon registration in the PFGU.</p> <p>Should not have spaces and should not be more than 200 characters.</p>
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### 6.3.2.2. NilReport

Because it's a blank data supply for a ReportingFI, within one ReportingGroup, NilReport appears one time and there are no AccountReports available in the ReportingGroup. If it's a supply of data (new or correction), then ReportingGroup contains one or more AccountReport(s) and NilReport does not appear in the ReportingGroup.

NilReport consists of a DocSpec part and the field NoAccountToReport, which has 'yes' as the only value.

A NilReport is new with corresponding DocSpec with DocSpecTypeIndic=OECD1 or can be deleted with corresponding DocSpec with DocSpecTypeIndic=OECD3.

Correction of a NilReport does not occur as result of the contents of the NilReport (only the field NoAccountToReport). At the end of paragraph 5.4 it is described as cases 1 and 2 how you can go from NilReport to supply of data and vice versa for a ReportingFI.

#### 6.3.2.2.1. NilReport – DocSpec

**DocSpec** contains the unique identification for the datagroup NilReport within ReportingGroup and contains, in case of a correction at which the NilReport is deleted for the ReportingFI, a reference to the unique identification of the supply of NilReport-data which has to be removed. **DocSpec consists of** : DocTypeIndic, DocRefId and in case of a correction for the removal of a NilReport also CorrDocRefId.

Data name	MessageBody - ReportingGroup – NilReport – DocSpec - DocTypeIndic
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/NilReport/DocSpec/DocTypeIndic
Description	Characterization of the NilReport data (new or deleted)
Conditions	Mandatory
Explanation	<p>CRS identifies a few DocTypeIndic values, namely:</p> <ul style="list-style-type: none"> <li>• <b>OECD1</b> = new data</li> <li>• <b>OECD2</b> = corrected data – <b>n.a. for NilReport</b></li> <li>• <b>OECD3</b> = deleted data</li> </ul> <p>And when testing the data supply:</p> <ul style="list-style-type: none"> <li>• <b>OECD11</b> = new test data</li> <li>• <b>OECD12</b> = corrected test data – <b>n.a. for NilReport</b></li> <li>• <b>OECD13</b> = deleted test data</li> </ul> <p>Prior to the release of the PFGU for a certain fiscal year, only the DocTypeIndic codes OECD11, OECD12 and OECD13 shall be allowed (these are test supplies). From the moment of release of the PFGU for a certain fiscal year, only the DocTypeIndic codes OECD1, OECD2 and OECD3 shall be allowed (these are production supplies).</p>
Cardinality	1..1
Format	xsd:string (one of the values from Domain)
Domain	The values are: OECD1, OECD3, OECD11, OECD13

Data name	MessageBody - ReportingGroup – NilReport – DocSpec - DocRefId
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/NilReport/DocSpec/DocRefId
Description	Unique indication of the datagroup NilReport in the FATCA-CRS report.
Conditions	Mandatory
Explanation	The report consists of parts (datagroup). If a part is correctable, then it has a DocRefId. The supplying financial institution shall create the DocRefId.
Cardinality	1..1
Format	xsd:stringMax200
Domain	The first six characters have to be equal to 'CW' followed by the fiscal year (JJJJ) for which the data in the report are applicable. So, for fiscal year 2016 it is 'CW2016'. Subsequently, the CRIB-number of the supplying financial institution should be included followed by the identification of the report as such. Instead of the CRIB-number, Sponsors use the number that they have received upon registration in the PFGU.  Should not have spaces and should not be more than 200 characters.

Data name	MessageBody - ReportingGroup – NilReport – DocSpec - CorrDocRefId
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/NilReport/DocSpec/CorrDocRefId
Description	If there is a removal of NilReport data from a previous report, then CorrDocRefId shall refer to the DocRefId of the datagroup NilReport within the report, that the removal is related to.
Conditions	Mandatory if there is a removal
Explanation	CorrDocRefId is a DocRefId that was previously created by the supplying financial institution.
Cardinality	0..1 (mandatory in case of removal)
Format	xsd:stringMax200
Domain	The first six characters have to be equal to 'CW' followed by the fiscal year (JJJJ) for which the data in the report are applicable. So, for fiscal year 2016 it is 'CW2016'. Subsequently, the CRIB-number of the supplying financial institution should be included followed by the identification of the report as such. Instead of the CRIB-number, Sponsors use the number that they have received upon registration in the PFGU.  Should not have spaces and should not be more than 200 characters.

#### 6.3.2.2.2. NilReport – data

NilReport has one data, namely NoAccountToReport, which shall be mandatory if NilReport is included in the ReportingGroup. The value of NoAccountToReport is always 'yes'.

Data name	MessageBody - ReportingGroup – NilReport – NoAccountToReport
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/NilReport/NoAccountToReport
Description	With 'yes' it is indicated that for the ReportingFI there is no account for which a report is required (blank data supply for a ReportingFI).
Conditions	Mandatory if there is a NilReport
Explanation	None
Cardinality	1..1
Format	xsd:string (fixed value)
Domain	Always value 'yes' if NilReport is supplied

#### 6.3.2.3. AccountReport

Within one ReportingGroup, AccountReport can appear 1 or more times. For AccountReport as part of a ReportingGroup, new, corrected and withdrawn shall be possible and therefore there is a DocSpec part on AccountReport level in order to uniquely identify the part and if necessary refer back to the AccountReport to be corrected from a previous report. In case of correction, AccountReport shall fully be supplied again, including the data that was not changed. In case of removal it shall be sufficient to remove the DocSpec and a supply of AccountReport data shall follow or the DocTypeIndic=OECD1 (in case of real data) or OECD11 (in case of test data).

As from fiscal year 2016, one or more AccountReports should be supplied if:

- there are accountholder(s) that are US-persons with account balance > \$ 50.000;
- there are accountholder(s) that have an MCAA-country as jurisdiction of residence (regardless of the level of the account balance; even if this accountholder is also a US-person).

If an AccountReport is supplied, then the Inspectorate will provide the following to the IRS or an MCAA-country:

- the AccountReport with account balance and payments to the IRS if the account balance is > \$ 50.000
- the AccountReport with account balance and payments to the relevant MCAA-country regardless of the level of the account balance.

Within AccountReport, the following datagroups are identified:

- AccountNumber
- AccountHolder (as from fiscal year 2015, the note “recalcitrant” shall be possible; intended for FATCA)
- SubstantialOwner (only used for FATCA)
- ControllingPerson (only used for CRS)
- Account balance
- Payment
- Additional Data (new compared to fiscal year 2015)

An AccountReport starts with a DocSpec datagroup.

For **a . . . and/or** account, an AccountReport should be separately supplied for each accountholder. Within an AccountReport, the AccountNumber, AccountHolder (either Individual or Organization) and Account balance should mandatorily appear one time. Payment shall not appear one time or several times.

SubstantialOwner (FATCA and thus in case of US-persons as AccountHolder) and ControllingPerson (CRS and thus in case of AccountHolders that have one or more MCAA-countries as Jurisdiction of Residence) shall not appear one time or several times.

#### **6.3.2.3.0. AccountReport – DocSpec**

**DocSpec** contains the unique identification for the datagroup AccountReport within ReportingGroup and contains, in case of supply of corrections in datagroup AccountReport, a reference to the unique identification of the supply of AccountReport data which is corrected by means of the data in this report (supplied again).

**DocSpec consists of** : DocTypeIndic, DocRefId and in case of a correction also CorrDocRefId.

Data name	MessageBody - ReportingGroup – AccountReport – DocSpec - DocTypeIndic
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/DocSpec/DocTypeIndic
Description	Characterization of the AccountReport data (new, corrected, deleted, amended)
Conditions	Mandatory

Explanation	<p>CRS identifies a few DocTypeIndic values, namely:</p> <ul style="list-style-type: none"> <li>• <b>OECD1</b> = new data</li> <li>• <b>OECD2</b> = corrected data</li> <li>• <b>OECD3</b> = deleted data</li> </ul> <p>And when testing the data supply:</p> <ul style="list-style-type: none"> <li>• <b>OECD11</b> = new test data</li> <li>• <b>OECD12</b> = corrected test data</li> <li>• <b>OECD13</b> = deleted test data</li> </ul> <p>Prior to the release of the PFGU for a certain fiscal year, only the DocTypeIndic codes OECD11, OECD12 and OECD13 shall be allowed (these are test supplies). From the moment of release of the PFGU for a certain fiscal year, only the DocTypeIndic codes OECD1, OECD2 and OECD3 shall be allowed (these are production supplies).</p> <p><b>PLEASE NOTE</b> A FATCA-CRS report with for a AccountReport a DocSpec with DocTypeIndic = OECD3 shall always be followed by a FATCA-CRS report with for the same AccountReport a DocSpec with DocTypeIndic = OECD1 (in case of testing, it is OECD13 followed by OECD11).</p>
Cardinality	1..1
Format	xsd:string (one of the values from Domain)
Domain	The values are: OECD1, OECD2, OECD3, OECD11, OECD12, OECD13

<b>Data name</b>	<b>MessageBody - ReportingGroup – AccountReport – DocSpec - DocRefId</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/DocSpec/DocRefId
Description	Unique indication of the datagroup AccountReport in the FATCA-CRS report.
Conditions	Mandatory
Explanation	The report consists of parts (datagroup). If a part is correctable, then it has a DocRefId. The supplying financial institution shall create the DocRefId.
Cardinality	1..1
Format	xsd:string
Domain	<p>The first six characters have to be equal to 'CW' followed by the fiscal year (JJJJ) for which the data in the report are applicable. So, for fiscal year 2016 it is 'CW2016'. Subsequently, the CRIB-number of the supplying financial institution should be included followed by the identification of the report as such. Instead of the CRIB-number, Sponsors use the number that they have received upon registration in the PFGU.</p> <p>Should not have spaces and should not be more than 200 characters.</p>

<b>Data name</b>	<b>MessageBody - ReportingGroup – AccountReport – DocSpec - CorrDocRefId</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/DocSpec/CorrDocRefId
Description	If there is a correction or removal of AccountReport data from a previous report, then CorrDocRefId shall refer to the DocRefId of the datagroup AccountReport within the report, that the correction or removal is related to.
Conditions	Mandatory if there is a correction or removal
Explanation	CorrDocRefId is a DocRefId that was previously created by the supplying financial institution.
Cardinality	0..1 (Mandatory in case of correction or removal)
Format	xsd:string
Domain	The first six characters have to be equal to 'CW' followed by the fiscal year (JJJJ) for which the data in the report are applicable. So, for fiscal year 2016 it is 'CW2016'. Subsequently,

	<p>the CRIB-number of the supplying financial institution should be included followed by the identification of the report as such. Instead of the CRIB-number, Sponsors use the number that they have received upon registration in the PFGU.</p> <p>Should not have spaces and should not be more than 200 characters.</p>
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**6.3.2.3.1. AccountReport – AccountNumber**

<b>Data name</b>	<b>MessageBody - ReportingGroup – AccountReport – AccountNumber</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountNumber
Description	Accountnumber or other unique identification, which the financial institution uses to identify the account. If this is not the case, fill in 'NANUM' to indicate that there is no account identification within the financial institution.
Conditions	Mandatory
Explanation	<p>If AccountNumber@AccountNumberType = OECD601, then the structure of the AccountNumber should comply with the structure for an IBAN-number, which has a maximum length of 34 positions and varies per country, but always complies with:</p> <ul style="list-style-type: none"> <li>- country code according to ISO 3166-1 alpha-2</li> <li>- two numbers as verification number</li> <li>- an account identification consisting of a maximum of 30 numbers and letters</li> </ul> <p>If AccountNumber@AccountNumberType = OECD603, then the structure of the AccountNumber should comply with the structure for an ISIN-number, which has a length of twelve positions and complies with:</p> <ul style="list-style-type: none"> <li>- country code according to ISO 3166-1 alpha-2</li> <li>- nine numbers as account identification</li> <li>- a number as verification number</li> </ul> <p>No controls shall be executed for the remaining AccountNumberTypes.</p>
Cardinality	1..1
Format	xsd:string
Domain	The actual accountnumber or if there is no accountnumber 'NANUM'.

<b>Data name</b>	<b>MessageBody - ReportingGroup – AccountReport – AccountNumber – AccountNumberType</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountNumber@AccountNumberType
Description	<p>Type of accountnumber with the following possible values:</p> <ul style="list-style-type: none"> <li>• <b>OECD601</b> = IBAN (International Bank Account Number with standard structure)</li> <li>• <b>OECD602</b> = OBAN (Other Bank Account Number)</li> <li>• <b>OECD603</b> = ISIN (International Securities Information Number; standard structure)</li> <li>• <b>OECD604</b> = OSIN (Other Securities Information Number)</li> <li>• <b>OECD605</b> = Other (every other type of accountnumber or insurance contract)</li> </ul>
Conditions	Optional
Explanation	If IBAN or ISIN are available, then this type of accountnumber should be supplied.
Cardinality	0..1
Format	xsd:string (one of the values from Domain)
Domain	Value range is: OECD601, OECD602, OECD603, OECD604, OECD605

<b>Data name</b>	<b>MessageBody - ReportingGroup – AccountReport – AccountNumber – UndocumentedAccount</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountNumber@UndocumentedAccount
Description	Element to indicate that an account is not documented.
Conditions	(optional) mandatory
Explanation	This element is only intended for local use (and is not used as such in the reporting traffic between financial institutions in Curaçao and the Inspectorate)

Cardinality	0 (not used for Curaçao)
Format	xsd:boolean
Domain	'true' and 'false'.

<b>Data name</b>	<b>MessageBody - ReportingGroup – AccountReport – AccountNumber - ClosedAccount</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountNumber@ClosedAccount
Description	This element indicates that the Account terminated during the ReportingPeriod.
Conditions	(optional) mandatory
Explanation	Element is only used to indicate that an account terminated. In case the account still continues beyond the ReportingPeriod, then ClosedAccount shall not be supplied.
Cardinality	0..1 (only to be supplied with 'true', f.i. if account terminated in the ReportingPeriod)
Format	xsd:boolean
Domain	Only 'true' (terminated account) gets used. No use shall be made of 'false' (unterminated account); element shall not be supplied then.

In the FATCA XML report schedule version 2.0, AccountClosed is a separate field between Accountnumber and AccountHolder. The provision by the PFGU places the value from AccountNumber@ClosedAccount in the FATCA CRS XML report schedule version 2.0 in the separate field AccountClosed in the FATCA XML report schedule version 2.0. The CRS XML report schedule v1.0 corresponds, in terms of structure, to the FATCA CRS XML report v2.0.

<b>Data name</b>	<b>MessageBody - ReportingGroup – AccountReport – AccountNumber - DormantAccount</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountNumber@DormantAccount
Description	This element indicates that an Account is dormant during the entire ReportingPeriod.
Conditions	Optional
Explanation	Element is only used to indicate that an account is dormant.
Cardinality	0..1 (only to be supplied with 'true', i.c. if the account is dormant)
Format	xsd:boolean
Domain	Only 'true' (dormant account) is used. No use shall be made of 'false' (non-dormant account); element shall not be supplied then.

#### **6.3.2.3.2. AccountReport - AccountHolder**

If the AccountHolder is a natural person, then the datagroup Individual shall be supplied in a completed form. If the AccountHolder is not a natural person, then the datagroup Organization shall be supplied in a completed form.

One of the two datagroups is filled in. In addition, the type of AccountHolder for FATCA and CRS shall be supplied.

##### **6.3.2.3.2.1. AccountHolder - Individual**

If an AccountHolder is a natural person, then the datagroup Individual shall be supplied, consisting of :

- **ResCountryCode(s)**
- **Recalcitrant (true/false)** - only of interest for the FATCA; shall not be supplied to MCAA-countries
- **TIN** (Tax Identification Number) within each ResCountryCode, consisting of :
  - the identification as such,
  - IssuedBy
- **Name or names** of the AccountHolder, a natural person(at least one name shall be mandatory and several Names are possible) consisting of :
  - a type indication of that name
  - Previous Title
  - Title

- First name
- Infix
- Prefix
- Last name
- Generation identifier
- Suffix
- General Suffix
- **Address(es)** of the AccountHolder, a natural person (a minimum of one address and several addresses are possible), consisting of :
  - the country code
  - a type indication of the address
  - the address as such
    - in a fixed format (optionally supplemented with AddressFree as a supplementation) with the following attributes:
      - street
      - building identifier
      - suite identifier
      - floor identifier
      - district name
      - P.O. Box
      - postal code
      - city
      - country subentity
    - or free format (AddressFree)
      - the Address as xsd:string
- **Nationality** (shall not be used)
- **Birth data** of the AccountHolder (natural person), consisting of :
  - Birth date
  - Place of birth
  - City district Place of birth
  - Country of birth information (one of the two):
    - Country of birth (code) in case current jurisdiction is the country of birth
    - Country of birth (name) in case current jurisdiction is not the country of birth

Cardinality is given for the situation, that the AccountHolder is a natural person.

Data name	MessageBody - ReportingGroup – AccountReport - AccountHolder - Individual - ResCountryCode
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/ResCountryCode
Description	The country code of the 'tax residence' of the AccountHolder (a natural person).
Conditions	The element ResCountryCode shall be repeated in AccountHolder/Individual as often as there are Jurisdiction(s) of Residence and/or US-persons.
Explanation	By means of ResCountryCode it is indicated for what countries this Account is important. For each MCAA-country that is a Jurisdiction of Residence for the accountholder (CRS) and in case of US-person (FATCA), an element ResCountryCode shall be included: <ul style="list-style-type: none"> <li>• if it is a US-person, then there is an element ResCountryCode completed with 'US'</li> <li>• If the jurisdiction of residence of the accountholder is Italy, then there is an element ResCountryCode completed with 'IT'</li> </ul>
Cardinality	1..N (always a completed element supplied)



Format	xsd:string (2 positions)
Domain	Country code has to comply with ISO-3166-1

<b>Data name</b>	<b>MessageBody - ReportingGroup – AccountReport – AccountHolder – Individual – Recalcitrant</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/Recalcitrant
Description	<p>Element to indicate that an accountholder individual is recalcitrant. This element shall always be available:</p> <ul style="list-style-type: none"> <li>in case of a recalcitrant accountholder individual, the value shall be 'true'.</li> <li>If that is not the case, then the value shall be 'false'.</li> </ul>
Conditions	Mandatory
Explanation	None
Cardinality	1..1
Format	xsd:boolean
Domain	<p>'true' (If the accountholder individual is recalcitrant)</p> <p>'false' (If the accountholder organization is not recalcitrant)</p>

The following elements shall form the **Tax Identification Number (TIN)** of the AccountHolder (natural person).

<b>Data name</b>	<b>MessageBody - ReportingGroup – AccountReport - AccountHolder - Individual – TIN</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/TIN
Description	<p>TIN (Tax Identification Number) of the AccountHolder Individual in the country for which the data are intended (USA or an MCAA-country). For each ResCountryCode a TIN, at least if it is known. If for an MCAA-country, the TIN is not available in the administration of the financial institution, then it is not necessary to supply the element (and TIN@IssuedBy). Upon provision to the MCAA-country, you will receive a notification that the TIN shall be mandatory.</p> <p><b>As from fiscal year 2016, for FATCA, the TIN, applicable in the USA, shall be mandatory.</b></p> <p>The correct format of a TIN in the US is:</p> <ul style="list-style-type: none"> <li>999999999 (a combination of nine position numbers) or</li> <li>999-99-9999 (a combination of three position numbers and two position numbers and four position numbers with a hyphen in between) or</li> <li>99-9999999 (a combination of two position numbers and seven position numbers and four position numbers with a hyphen in between)</li> </ul> <p>The IRS monitors on these formats and sends back a notification if one of the formats have not been complied with. If the TIN is absolutely unknown, then filling in '000000000' (nine zeros) is the best alternative.</p>
Conditions	(Optional) Mandatory
Explanation	<p>For FATCA that is the TIN in the USA</p> <p>For CRS it is the TIN in the relevant Jurisdiction of Residence (more than one shall be possible)</p> <p>The elements TIN and TIN@IssuedBy belong together (and are optional).</p> <p>If TIN is supplied then TIN@IssuedBy shall be mandatory :</p> <ul style="list-style-type: none"> <li>in case of a US person, the elements should be filled in with TINinUS and US;</li> <li>in case jurisdiction of residence for CRS is Italy, the elements "the TIN in Italy" and 'IT' should be filled in.</li> </ul> <p>At several jurisdictions of residence in the framework of CRS and/or US-person, an element has to be filled in for each jurisdiction of residence. TIN@IssuedBy should be one of the country codes at ResCountryCode of the AccountHolder Individual.</p> <p>For an account that already existed before it became a reportable account, TIN's shall not be mandatory if these are not necessary under the local legislation. A financial institution should reasonably make an effort to supply the TIN for existing accounts in the second calendar year following the first year in which the account is reportable.</p>

Cardinality	0..N
Format	xsd:stringMax200 (and the TIN has to comply with the format that is applicable in the IssuedBy country)
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - AccountHolder - Individual - TIN - IssuedBy</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/TIN@IssuedBy
Description	Description of the jurisdiction that has issued the TIN
Conditions	Mandatory if TIN is supplied
Explanation	The country in which the TIN is applicable
Cardinality	1..1
Format	xsd:string (2 positions)
Domain	Country code has to comply with ISO-3166-1 and should be one of the ResCountryCodes with this AccountHolder.

For an AccountHolder Individual, one name (with attributes) shall be mandatory and several names (with attributes) shall be possible. The following elements form the **name** of the AccountHolder (a natural person).

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - AccountHolder - Individual - Name - NameType</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/Name@NameType
Description	Type of name with the following possible values: <ul style="list-style-type: none"> <li>• <b>OECD202</b> = indiv</li> <li>• <b>OECD203</b> = alias</li> <li>• <b>OECD204</b> = nick</li> <li>• <b>OECD205</b> = AKA (also known as)</li> <li>• <b>OECD206</b> = DBA (does business as)</li> <li>• <b>OECD207</b> = legal</li> <li>• <b>OECD208</b> = name at birth</li> </ul>
Conditions	Optional
Explanation	Element shall be used for CRS and shall not be used for FATCA. OECD201 (reserved for SMFAliasOrOther) shall not be used.
Cardinality	0..1
Format	xsd:string (with a value from value range in Domain)
Domain	Value range is: OECD202, OECD203, OECD204, OECD205, OECD206, OECD207, OECD208

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - AccountHolder - Individual - Name - Preceding Title</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/Name/Preceding Title
Description	Preceding title
Conditions	Optional
Explanation	For example 'His Excellency'
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - AccountHolder - Individual - Name - Title</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/Name/Title
Description	Title
Conditions	Optional
Explanation	For example 'Dr.', but also 'Mrs.', 'Mr.'
Cardinality	0..N
Format	xsd:stringMax200
Domain	A maximum of 200 characters

Data name	MessageBody - ReportingGroup - AccountReport - AccountHolder - Individual – Name - FirstName
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/Name/FirstName
Description	First name
Conditions	Mandatory for CRS and as from fiscal year 2016 also mandatory for FATCA. If Accountholder Individual does not have a first name, then 'NFN' should be filled in as first name.
Explanation	None
Cardinality	1..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

Data name	MessageBody - ReportingGroup - AccountReport - AccountHolder - Individual – Name – FirstName - xnlNameType
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/Name/FirstName@xnlNameType
Description	<p>xnlNameType at FirstName indicates what type of name the FirstName is. Examples are:</p> <ul style="list-style-type: none"> <li>• given name</li> <li>• forename</li> <li>• Christian name</li> <li>• father's name</li> <li>• etc.</li> </ul> <p>In some countries, the FirstName can be a family name or a last name.</p>
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:string
Domain	see Description

Data name	MessageBody - ReportingGroup - AccountReport - AccountHolder - Individual – Name – MiddleName
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/Name/MiddleName
Description	Middle name
Conditions	Optional
Explanation	Is an important part of the name for many nationalities.
Cardinality	0..N
Format	xsd:stringMax200
Domain	A maximum of 200 characters

Data name	MessageBody - ReportingGroup - AccountReport - AccountHolder - Individual – Name – MiddleName – xnlNameType
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/Name/MiddleName@xnlNameType
Description	<p>xnlNameType at MiddleName indicates what type of name the MiddleName is. Examples are:</p> <ul style="list-style-type: none"> <li>• first name</li> <li>• middle name</li> <li>• maiden name</li> <li>• father's name</li> <li>• given name</li> <li>• etc.</li> </ul>
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:string
Domain	see Description

Data name	MessageBody - ReportingGroup - AccountReport - AccountHolder - Individual – Name – NamePrefix
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/Name/NamePrefix
Description	Name prefix
Conditions	Optional
Explanation	Examples are 'van de ' or 'von'
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

Data name	MessageBody - ReportingGroup - AccountReport - AccountHolder - Individual – Name – NamePrefix – xnlNameType
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/Name/NamePrefix@xnlNameType
Description	xnlNameType at NamePrefix indicates what type of name the NamePrefix is. Examples are: <ul style="list-style-type: none"> <li>• de</li> <li>• van</li> <li>• van de</li> <li>• von</li> <li>• etc.</li> </ul>
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:string
Domain	see Description

Data name	MessageBody - ReportingGroup - AccountReport - AccountHolder - Individual – Name - LastName
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/Name/LastName
Description	Last name
Conditions	Mandatory
Explanation	For an AccountHolder (natural person), the last name is a mandatory element to be supplied.
Cardinality	1..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

Data name	MessageBody - ReportingGroup - AccountReport - AccountHolder - Individual – Name – LastName - xnlNameType
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/Name/LastName@xnlNameType
Description	xnlNameType at LastName indicates what type of name the LastName is. Examples are: <ul style="list-style-type: none"> <li>• father's name</li> <li>• family name</li> <li>• last name</li> <li>• mother's name</li> <li>• etc.</li> </ul> In some countries, the LastName can be a given name or a first name.
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:string
Domain	see Description

Data name	MessageBody - ReportingGroup - AccountReport - AccountHolder - Individual – Name – GenerationIdentifier
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/Name/GenerationIdentifier

Description	Generation identifier
Conditions	Optional
Explanation	For example 'III' or 'Third'
Cardinality	0..N
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - AccountHolder - Individual – Name – Suffix</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/Name/Suffix
Description	Name suffix
Conditions	Optional
Explanation	Example is 'PhD'
Cardinality	0..N
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - AccountHolder - Individual – Name – GeneralSuffix</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/Name/GeneralSuffix
Description	General suffix
Conditions	Optional
Explanation	For example 'retired'
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

A minimum of one address should be supplied and several addresses shall be possible. An address shall be supplied:

- as AddressFix (the address is then represented in a few elements) with optional use of AddressFree for supplementation on the AddressFix elements
- as AddressFree (free text in one element)

In both cases, the address should mention the country code (CountryCode) and address type (AddressType).

<b>Data name</b>	<b>MessageBody - ReportingGroup – AccountReport - AccountHolder - Individual - Address – AddressType</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/Address@AddressType
Description	This element indicates what type of address the AccountHolder (natural person) address is.
Conditions	Optional
Explanation	CRS identifies a few address types, namely: <ul style="list-style-type: none"> <li>• <b>OECD301</b> = residential or business</li> <li>• <b>OECD302</b> = residential</li> <li>• <b>OECD303</b> = business</li> <li>• <b>OECD304</b> = registered office</li> <li>• <b>OECD305</b> = unspecified</li> </ul>
Cardinality	0..1
Format	xsd:string (one of the values from Domain)
Domain	The values are: OECD301, OECD302, OECD303, OECD304, OECD305.

<b>Data name</b>	<b>MessageBody - ReportingGroup – AccountReport - AccountHolder - Individual - Address –CountryCode</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/Address/CountryCode
Description	The country code of the country where the AccountHolder (natural person) is located
Conditions	Mandatory (monitoring on appearance in the ISO-3166-1 standard)
Explanation	None

Cardinality	1..1
Format	xsd:string (2 positions) and should comply with the ISO-3166-1 standard
Domain	Values according to the ISO-3166-1 standard

**Elements from AddressFix** are Street, BuildingIdentifier, SuiteIdentifier, FloorIdentifier, DistrictName, POB, Postal code, City and CountrySubentity Optional with AddressFree for supplementary information. CRS prefers addresses in the form of an AddressFix representation. Only if there is no other option, then an address in AddressFree representation shall be allowed.

<b>Data name</b>	<b>MessageBody - ReportingGroup – AccountReport - AccountHolder - Individual - Address – AddressFix – Street</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/Address/AddressFix/Street
Description	Street name of the AccountHolder address (natural person)
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody-ReportingGroup–AccountReport - AccountHolder-Individual–Address –AddressFix–BuildingIdentifier</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/Address/AddressFix/BuildingIdentifier
Description	Building identifier, if applicable in the AccountHolder address (natural person)
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody-ReportingGroup–AccountReport-AccountHolder - Individual – Address – AddressFix – SuiteIdentifier</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/Address/AddressFix/SuiteIdentifier
Description	Suite identifier, if applicable in the AccountHolder address (natural person)
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody-ReportingGroup-AccountReport - AccountHolder - Individual – Address – AddressFix – FloorIdentifier</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/Address/AddressFix/FloorIdentifier
Description	Floor identifier, if applicable in the AccountHolder address (natural person)
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody-ReportingGroup-AccountReport- AccountHolder - Individual – Address – AddressFix – Districtname</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/Address/AddressFix/DistrictName
Description	Name of the district, if applicable in the AccountHolder address (natural person)
Conditions	Optional

Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - AccountHolder - Individual – Address – AddressFix – POB</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/Address/AddressFix/POB
Description	P.O. Box number, if applicable in the AccountHolder address (natural person)
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - AccountHolder - Individual – Address – AddressFix – Postal code</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/Address/AddressFix/Postal code
Description	Postal code, if applicable in the AccountHolder address (natural person)
Conditions	Optional
Explanation	In Curaçao, we don't use postal codes. If the country of residence Curaçao is, then the postal code shall be blank.
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup – AccountReport - AccountHolder - Individual – Address – AddressFix – City</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/Address/AddressFix/City
Description	City in the AccountHolder address (natural person)
Conditions	Mandatory
Explanation	The city shall be mandatory and shall be used for validation
Cardinality	1..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody-ReportingGroup-AccountReport-AccountHolder-Individual-Address – AddressFix – CountrySubentity</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/Address/AddressFix/CountrySubentity
Description	Country subentity, if applicable in the AccountHolder address (natural person)
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

**AddressFree** consists of one element (xsd:string).

<b>Data name</b>	<b>MessageBody - ReportingGroup – AccountReport - AccountHolder - Individual - Address – AddressFree</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/Address/AddressFree
Description	Free text description of the address.
Conditions	Optional

Explanation	<ul style="list-style-type: none"> <li>Only to be used if the elements from AddressFix cannot be supplied for the AccountHolder Address (natural person).</li> <li>Or to be used optionally as supplementation on the data in the AddressFix Format. AddressFree can have a maximum length of 4000.</li> </ul>
Cardinality	0..1
Format	xsd:stringMax4000
Domain	A maximum of 4000 characters

The following element concerns the **nationality** of the AccountHolder (a natural person). This element shall not be utilized for neither FATCA nor CRS and shall as such not be requested to be supplied.

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - AccountHolder - Individual – Nationality</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/Nationality
Description	Nationality of the AccountHolder (natural person) – <b>not to be used</b> (see Explanation)
Conditions	Optional (do not supply)
Explanation	"Standard for Automatic Exchange of Financial Account Information in Tax Matters" of the OECD (page 241) states that 'This data element is not required for CRS and should not be completed'. FATCA uses this data in the same way. Reason why it is recorded in the Manual that the data should <u>not be supplied</u> .
Cardinality	0..0 (not to be used)
Format	xsd:string
Domain	n/a

The following element form the **birth data** of the AccountHolder (a natural person).

FATCA only uses birth date.

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - AccountHolder - Individual – BirthInfo – BirthDate</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/BirthInfo/BirthDate
Description	Birth date of AccountHolder (natural person)
Conditions	(Optional) mandatory
Explanation	Birth date may be left empty if it's an already existing account and the financial institution is unable to find out the birth date.
Cardinality	0..1
Format	YYYY-MM-DD
Domain	A date in the past

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - AccountHolder - Individual – BirthInfo – City</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/BirthInfo/City
Description	Place of birth of AccountHolder (natural person)
Conditions	Optional (and not used for FATCA)
Explanation	Place of birth may be left empty.
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

One of the two elements below shall be supplied if place of birth or place of birth and city district have been filled in. It can be:

- current jurisdiction (country code according to the ISO-3166-1 standard in BirthInfo/CountryInfo/CountryCode) or
- a former jurisdiction (name of the country in BirthInfo/CountryInfo/FormerCountryName).



Data name	MessageBody - ReportingGroup - AccountReport - AccountHolder - Individual – BirthInfo – CountryInfo – CountryCode
Xpath (XML)	FATCA_CRS/MessageBody//ReportingGroup/AccountReport/AccountHolder/Individual/BirthInfo/CountryInfo/CountryCode
Description	Country of birth of AccountHolder (natural person)
Conditions	Optional (and not used for FATCA)
Explanation	Country code of country of birth is completed if Place of birth (with or without City district) is filled in and the current jurisdiction is the country of birth.
Cardinality	0..1
Format	xsd:string (2 positions)
Domain	Countrycode according to the ISO-3166-1 Format

Data name	MessageBody - ReportingGroup - AccountReport - AccountHolder - Individual – BirthInfo – CountryInfo – FormerCountryName
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/BirthInfo/CountryInfo/FormerCountryName
Description	Country of birth of the AccountHolder (natural person)
Conditions	Optional (and not used for FATCA)
Explanation	Name of the country of birth is completed if Place of birth (with or without City district) is filled in and the current jurisdiction is not the country of birth.
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

#### 6.3.2.3.2.2. AccountHolder - Organization

If an AccountHolder is a non-natural person, then the datagroup Organization shall be supplied, consisting of :

- **ResCountryCode(s)**
- **Recalcitrant (true/false)** - only of interest for the FATCA; shall not be supplied to MCAA-countries
- ~~IngehoudenBronbelasting (true/false)~~
- **TIN** (Identification Number) within each ResCountryCode, consisting of :
  - the identification as such,
  - IssuedBy
- **Name or names** of the non-natural person as AccountHolder (a minimum of one name shall be mandatory and several names shall be possible), consisting of :
  - the name as such
  - a type indication of that name
- **Address(es)** of the non-natural person as AccountHolder (a minimum of one address and several shall be possible), consisting of :
  - the country code
  - a type indication of the address
  - the address as such
    - in a fixed format (optionally supplemented with AddressFree for supplementation) with the following attributes:
      - street
      - building identifier
      - suite identifier
      - floor identifier
      - district name
      - P.O. Box

- postal code
- city
- country subentity
- or free format (AddressFree)
- the address as xsd:stringMax4000

And also:

- **AcctHolderTypeFATCA** (if US appears at ResCountryCode)
- **AcctHolderTypeCRS** (if at ResCountryCode, there is / are one or more MCAA-countries as jurisdictions of residence)

Cardinality is given for the situation, that the AccountHolder is a non-natural person.

Data name	MessageBody - ReportingGroup – AccountReport - AccountHolder - Organization – ResCountryCode
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Organization/ResCountryCode
Description	The country code of the tax residence or US-person of the AccountHolder (non-natural person).
Conditions	The element ResCountryCode shall be repeated in AccountHolder/Organization as often as there are Jurisdiction(s) of Residence and/or US-persons.
Explanation	By means of ResCountryCode it is indicated for what countries this Account is important. For each MCAA-country that is a Jurisdiction of Residence for the accountholder (CRS) and in case of US-person (FATCA), an element ResCountryCode shall be included: <ul style="list-style-type: none"> <li>• If it is a US-person, then there is an element ResCountryCode completed with 'US'</li> <li>• If the jurisdiction of residence of the accountholder is Italy, then there is an element ResCountryCode completed with 'IT'</li> </ul>
Cardinality	1..N (always one element supplied in completed form)
Format	xsd:string (2 positions)
Domain	Country code has to comply with ISO-3166-1

Data name	MessageBody - ReportingGroup – AccountReport – AccountHolder – Organization – Recalcitrant
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Organization/Recalcitrant
Description	Element to indicate that an accountholder Organization is recalcitrant. This element shall always be available: <ul style="list-style-type: none"> <li>• In case of a recalcitrant accountholder individual, the value shall be 'true'.</li> <li>• If that is not the case, then the value shall be 'false'.</li> </ul>
Conditions	Mandatory
Explanation	None
Cardinality	1..1
Format	xsd:boolean
Domain	'true' (If the accountholder organization is recalcitrant) 'false' (If the accountholder organization is not recalcitrant)

The following elements shall form the **Identification Number (IN)** of the AccountHolder (non-natural person).

Data name	MessageBody - ReportingGroup – AccountReport - AccountHolder - Organization – TIN
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Organization/TIN
Description	TIN (Tax Identification Number) of the AccountHolder Organization in the country for which the data are intended (USA or an MCAA-country). For each ResCountryCode a TIN. If for an MCAA-country, the TIN is not available in the administration of the financial institution, then

	<p>TIN (and TIN@IssuedBy) may not be supplied. Upon provision to the MCAA-country, you will receive back a notification that the TIN shall be mandatory.</p> <p><b>As from fiscal year 2016, for FATCA, the TIN, applicable in the USA, shall be mandatory.</b></p> <p>The correct format of a TIN in the US is:</p> <ul style="list-style-type: none"> <li>- 999999999 (a combination of nine position numbers) or</li> <li>- 999-99-9999 (a combination of three position numbers and two position numbers and four position numbers with a hyphen in between) or</li> <li>- 99-9999999 (a combination of two position numbers and seven position numbers and four position numbers with a hyphen in between)</li> </ul> <p>The IRS monitors on these formats and sends back a notification if one of the formats have not been complied with. If the TIN is absolutely unknown, then filling in '000000000' (nine zeros) is the best alternative.</p>
Conditions	(Optional) Mandatory
Explanation	<p>For FATCA that is the TIN in the USA. For CRS it is the TIN in the relevant Jurisdiction of Residence (more than one shall be possible). It concerns a TIN of a non-natural person.</p> <p>The elements TIN and TIN@IssuedBy belong together (and are optional). If TIN is supplied then TIN@IssuedBy shall be mandatory :</p> <ul style="list-style-type: none"> <li>• in case of a US person, the elements should be filled in with TINinUS and US;</li> <li>• in case jurisdiction of residence for CRS is Italy, the elements "with the TIN in Italy" and 'IT' should be filled in.</li> </ul> <p>At several jurisdictions of residence in the framework of CRS and/or US-person, an element has to be filled in for each jurisdiction of residence. TIN@IssuedBy should be one of the country codes at ResCountryCode of the AccountHolder Organization.</p> <p>For an account that already existed before it became a reportable account, TIN's shall not be mandatory if these are not necessary under the local legislation. A financial institution should reasonably make an effort to supply the TIN for existing accounts in the second calendar year following the first year in which the account is reportable.</p>
Cardinality	0..N
Format	<p>xsd:stringMax200</p> <p>the format that is allowed for the TIN's in the USA and MCAA-countries, shall clearly have less characters</p>
Domain	A maximum of 200 characters

Data name	MessageBody - ReportingGroup – AccountReport - AccountHolder - Organization - TIN – IssuedBy
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Organization/TIN@IssuedBy
Description	Description of the jurisdiction that issued the TIN
Conditions	Mandatory if TIN is supplied
Explanation	The country in which the TIN is applicable
Cardinality	1..1
Format	xsd:string (2 positions)
Domain	Country code has to comply with ISO-3166-1 and should be one of the ResCountryCodes with this AccountHolder.

In the XML report schedule FATCA CRS the TIN-attribute INType has still not been included at OrganizationParty\_Type. In the CRS report schedule, INType appears as optional attribute of IN.

For an AccountHolder Organization one name shall be mandatory and several names shall be possible. The following elements form the **name** of an AccountHolder Organization (non-natural person).

Data name	MessageBody - ReportingGroup - AccountReport - AccountHolder - Organization - Name
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Organization/Name
Description	The legal name of the AccountHolder (a non-natural person)
Conditions	Mandatory
Explanation	None
Cardinality	1..N
Format	xsd:stringMax200
Domain	A maximum of 200 characters

Data name	MessageBody - ReportingGroup - AccountReport - AccountHolder - Organization - NameType
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Organization/Name@NameType
Description	Characterization of the name of the AccountHolder (not used in the FATCA-CRS report)
Conditions	Optional
Explanation	Element is used for CRS and is not used for FATCA. OECD201 (reserved for SMFAliasOrOther) is not used.
Cardinality	0..0 (not used)
Format	xsd:string (with a value from value range in Domain)
Domain	Value range is: OECD202, OECD203, OECD204, OECD205, OECD206, OECD207, OECD208

The following elements form the **address** of the AccountHolder (non-natural person), which can be supplied in two ways:

- as AddressFix (the address is then represented in a few elements) with optional use of AddressFree for supplementation on the AddressFix elements
- as AddressFree (free text in one element)

In both cases, the address shall be provided with the country code (CountryCode) and an address type (AddressType).

Data name	MessageBody-ReportingGroup-AccountReport-AccountHolder-Organization - Address - AddressType
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Organization/Address@AddressType
Description	This element indicates what type of address the AccountHolder (non-natural person) address is.
Conditions	Optional
Explanation	CRS identifies a few address types, namely: <ul style="list-style-type: none"> <li>• <b>OECD301</b> = residential or business</li> <li>• <b>OECD302</b> = residential</li> <li>• <b>OECD303</b> = business</li> <li>• <b>OECD304</b> = registered office</li> <li>• <b>OECD305</b> = unspecified</li> </ul>
Cardinality	0..1
Format	xsd:string (one of the values from Domain)
Domain	The values are: OECD301, OECD302, OECD303, OECD304, OECD305.

Data name	MessageBody-ReportingGroup-AccountReport-AccountHolder-Organization - Address - CountryCode
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Organization/Address/CountryCode
Description	The country code of the country where the AccountHolder (non-natural person) is established
Conditions	Mandatory (monitoring on appearance in the ISO-3166-1 standard)
Explanation	None
Cardinality	1..1

Format	xsd:string (2 positions) and complies with ISO-3166-1 standard
Domain	Values according to the ISO-3166-1 standard

**Elements from AddressFix** are Street, BuildingIdentifier, SuiteIdentifier, FloorIdentifier, DistrictName, POB, Postal code, City and CountrySubentity optional with AddressFree for supplementary information. CRS prefers addresses in the form of an AddressFix representation. Only if there is no other option, then an address in AddressFree representation shall be allowed.

<b>Data name</b>	<b>MessageBody-ReportingGroup-AccountReport-AccountHolder-Organization-Address-AddressFix-Street</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Organization/Address/AddressFix/Street
Description	Street name of the AccountHolder address (non-natural person)
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup – AccountReport - AccountHolder - Organization – Address – AddressFix – BuildingIdentifier</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Organization/Address/AddressFix/BuildingIdentifier
Description	Building identifier, if applicable in the address of the AccountHolder Organization
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup – AccountReport - AccountHolder - Organization – Address – AddressFix – SuiteIdentifier</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Organization/Address/AddressFix/SuiteIdentifier
Description	Suite identifier, if applicable in the AccountHolder address (a non-natural person)
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - AccountHolder - Organization – Address – AddressFix – FloorIdentifier</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Organization/Address/AddressFix/FloorIdentifier
Description	Floor identifier, if applicable in the AccountHolder address (non-natural person)
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

Data name	MessageBody - ReportingGroup - AccountReport - AccountHolder - Organization – Address – AddressFix – Districtname
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Organization/Address/AddressFix/DistrictName
Description	Name of the district, if applicable in the AccountHolder address (non-natural person)
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

Data name	MessageBody - ReportingGroup - AccountReport - AccountHolder - Organization – Address – AddressFix – POB
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Organization/Address/AddressFix/POB
Description	P.O. Box number, if applicable in the AccountHolder address (non-natural person)
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

Data name	MessageBody - ReportingGroup - AccountReport - AccountHolder - Organization – Address – AddressFix – Postal code
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Organization/Address/AddressFix/Postal code
Description	Postal code, if applicable in the AccountHolder address (non-natural person)
Conditions	Optional
Explanation	In Curaçao, we don't use postal codes. If the country of residence is Curaçao, then the Postal code shall be blank.
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

Data name	MessageBody - ReportingGroup – AccountReport - AccountHolder - Organization – Address – AddressFix – City
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Organization/Address/AddressFix/City
Description	City in the AccountHolder address (non-natural person)
Conditions	Mandatory
Explanation	The city shall be mandatory and is used for validation
Cardinality	1..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

Data name	MessageBody - ReportingGroup - AccountReport - AccountHolder - Organization – Address – AddressFix – CountrySubentity
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Organization/Address/AddressFix/CountrySubentity
Description	Country subentity, if applicable in the AccountHolder address (non-natural person)
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200

Domain	A maximum of 200 characters
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**AddressFree** consists of one element (xsd:string).

Data name	MessageBody - ReportingGroup – AccountReport - AccountHolder - Organization - Address – AddressFree
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Organization/Address/AddressFree
Description	Free text description of the address.
Conditions	Optional
Explanation	<ul style="list-style-type: none"> <li>Only to be used if the elements from AddressFix cannot be supplied for the AccountHolder address (non-natural person).</li> <li>Or to be used optionally as a supplementation on the data in the AddressFix format.</li> </ul>
Cardinality	0..1
Format	xsd:stringMax4000
Domain	A maximum of 4000 characters

For FATCA and CRS other types of AccountHolders are distinguished and for ESRR no distinction is made according to type of AccountHolder. This was the reason to include, in the FATCA-CRS-ESRR report, two elements for AcctHolderType, namely AcctHolderTypeFATCA and AcctHolderTypeCRS.

Depending on the ResCountryCodes at AccountHolder/Organization, one of the two or both or none shall be delivered from the financial institutions (none if CRS is not yet operational and the ResCountryCodes are only EU-countries due to the ESRR-supply). The FATCA-type if the Accountholder Organization is a US-person (element is necessary for FATCA-supply) and the CRS-type if the accountholder (also) has another country as jurisdiction of residence (element is necessary for CRS-supply).

Data name	MessageBody-ReportingGroup – AccountReport – AccountHolder – Organization -AcctHolderTypeCRS
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Organization/AcctHolderTypeCRS
Description	Type of AccountHolder for CRS-supplies. Possible values are: <ul style="list-style-type: none"> <li><b>CRS101</b> = Passive Non-Financial Entity with one or more controlling persons that is a Reportable Person</li> <li><b>CRS102</b> = CRS Reportable Person</li> <li><b>CRS103</b> = Passive Non-Financial Entity that is a CRS Reportable Person</li> </ul>
Conditions	(Optional) mandatory
Explanation	As from fiscal year 2016, AcctHolderTypeCRS should be filled in if the AccountHolder has another country / other countries as jurisdiction of residence. If for fiscal year 2014 or 2015, there is an EU-resident as Accountholder, then this field shall not be supplied for such countries.
Cardinality	0..1
Format	xsd:string (one of the values from Domain)
Domain	Value range is: CRS101, CRS102, CRS103.

Data name	MessageBody-ReportingGroup–AccountReport–AccountHolder – Organization - AcctHolderTypeFATCA
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Organization/AcctHolderTypeFATCA
Description	Type of AccountHolder for FATCA-supplies. Possible values are: <ul style="list-style-type: none"> <li><b>FATCA101</b> = Owner-Documented FI with specified US owner(s)</li> <li><b>FATCA102</b> = Passive Non-Financial Entity with substantial US owner(s)</li> <li><b>FATCA103</b> = Non-participating FFI</li> <li><b>FATCA104</b> = Specified US Person</li> </ul>

	• <b>FATCA105</b> = Direct Reporting NFFE
Conditions	(Optional) mandatory
Explanation	AcctHolderTypeFATCA should be filled in if the AccountHolder is a US-person. If the AccountHolder is not a US-person, then this field shall not be supplied.
Cardinality	0..1
Format	xsd:string (one of the values from Domain)
Domain	Value range is: FATCA101, FATCA102, FATCA103, FATCA104, FATCA105.

IRS identifies as from fiscal year 2016, FATCA106 as well, but that is 'for US government use only' (and is therefore not part of the value range of AcctHolderTypeFATCA in the FATCA CRS XML report version 2.0.

#### **6.3.2.3.3. AccountReport – SubstantialOwner (only intended for FATCA)**

For FATCA it shall be mandatory to indicate at certain AcctHolderTypeFATCA who SubstantialOwner(s) are. SubstantialOwners shall not be applicable for supplies in the framework of the CRS.

SubstantialOwner(s) have to be supplied for the FATCA-supply, if there are:

- specified US owner(s) or
- a documented FI or
- substantial US owner(s) or controlling US-person(s) of a passive NFFE.

SubstantialOwners shall be mandatory as AcctHolderTypeFATCA in AccountReport = FATCA101 or FATCA102.

No supply of this datagroup in case of a non-participating FFI or a specified US person.

As from fiscal year 2016 (FATCA XML report version 2.0), you can also supply to the IRS, SubstantialOwners of the type of Organization. For fiscal year 2014 and 2015, the IRS only allows one individual as SubstantialOwner.

For each SubstantialOwner Individual, the following data shall be supplied:

- **ResCountryCode**
- **TIN** (Tax Identification Number) consisting of :
  - the identification as such,
  - IssuedBy
- **Name or names** of the SubstantialOwner Individual (a minimum of one name shall be mandatory and several names shall be possible), consisting of :
  - A type indication of that name
  - Previous Title
  - Title
  - First name
  - Infix
  - Prefix
  - Last name
  - Generation identification
  - Suffix
  - General Suffix
- **Address(es)** of the SubstantialOwner Individual (a minimum of one address and several shall be possible), consisting of :
  - the country code
  - a type indication of the address
  - the address as such



- in a fixed format (optionally supplemented with AddressFree for supplementation) with the following attributes:
  - street
  - building identifier
  - suite identifier
  - floor identifier
  - district name
  - P.O. Box
  - postal code
  - city
  - country subentity
- or free format (AddressFree)
  - the Address as xsd:stringMax4000
- **Nationality** (shall not be used)
- **Birth date** of the SubstantialOwner

For each SubstantialOwner Organization, the following data shall be supplied:

- **ResCountryCode**
- **TIN** (Identification Number) consisting of :
  - the identification as such,
  - IssuedBy
- **Name or names** of the SubstantialOwner Organization (a minimum of one name shall be mandatory and several names shall be possible) consisting of :
  - the name as such
  - a type indication of that name
- **Address(es)** of the SubstantialOwner Organization (at least one and several shall be possible) consisting of:
  - the country code
  - a type indication of the address
  - the address as such
    - in a fixed format (optionally supplemented with AddressFree for supplementation) with the following attributes:
      - street
      - building identifier
      - suite identifier
      - floor identifier
      - district name
      - P.O. Box
      - postal code
      - city
      - country subentity
    - or free format (AddressFree)
      - the Address as xsd:stringMax4000

Here are the fields that should be used if a **SubstantialOwner Individual** is supplied:

Data name	MessageBody - ReportingGroup – AccountReport - SubstantialOwner - Individual - ResCountryCode
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Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/SubstantialOwner/Individual/ResCountryCode
Description	The country code of the tax residence of the SubstantialOwner Individual
Conditions	There is a natural personal as substantial owner (see introduction paragraph 6.3.2.3.3).
Explanation	The SubstantialOwner Individual is a US-person and the tax residence is the US.
Cardinality	1..1
Format	xsd:string (is supplemented with US, this is data for the FATCA and it concerns a US-person)
Domain	Country code has to comply with ISO-3166-1

The following elements form the **Tax Identification Number (TIN)** of the SubstantialOwner Individual.

<b>Data name</b>	<b>MessageBody - ReportingGroup – AccountReport - SubstantialOwner - Individual – TIN</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/SubstantialOwner/Individual/TIN
Description	It concerns the TIN of the Substantial Owner in the US Substantial Owner shall only be used in case of supply of FATCA-data.
Conditions	Mandatory
Explanation	A SubstantialOwner Individual has exactly one TIN, because SubstantialOwner Individual has only US as TIN@Issued_By. The XML schedule does not allow, due to inheritance, any or more TIN at Substantial Owner Individual.
Cardinality	1..1
Format	xsd:stringMax200 (the Format of the TIN in USA is 999999999 or 999-99-9999 or 99-9999999)
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup – AccountReport - SubstantialOwner - Individual - TIN –IssuedBy</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/SubstantialOwner/Individual/TIN@IssuedBy
Description	The jurisdiction that issued the TIN
Conditions	Mandatory if TIN is filled in
Explanation	Because Substantial Owner only appears in case of a FATCA supply, TIN@IssuedBy shall always be equal to US.
Cardinality	1..1 (Mandatory if TIN is filled in, otherwise there shall be no TIN@IssuedBy)
Format	xsd:string (2 positions)
Domain	Country code has to comply with ISO-3166-1 (due to the definition of Substantial Owner, always equal to US)

For a SubstantialOwner Individual, one name (with attributes) shall be mandatory and several names (with attributes) shall be possible. The following elements shall form the **name** of the SubstantialOwner Individual.

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - SubstantialOwner - Individual - Name - NameType</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/SubstantialOwner/Individual/Name@NameType
Description	Type of name with the following possible values: <ul style="list-style-type: none"> <li>• <b>OECD202</b> = indiv</li> <li>• <b>OECD203</b> = alias</li> <li>• <b>OECD204</b> = nick</li> <li>• <b>OECD205</b> = AKA (also known as)</li> <li>• <b>OECD206</b> = DBA (does business as)</li> <li>• <b>OECD207</b> = legal</li> <li>• <b>OECD208</b> = name at birth</li> </ul>
Conditions	Optional
Explanation	Element shall not be used for FATCA. SubstantialOwner Individual is a FATCA datagroup.
Cardinality	0..1
Format	xsd:string (data shall not be used for SubstantialOwner Individual)
Domain	Value range is: OECD202, OECD203, OECD204, OECD205, OECD206, OECD207, OECD208

Data name	MessageBody-ReportingGroup-AccountReport-SubstantialOwner-Individual - Name – PrecedingTitle
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/SubstantialOwner/Individual/Name/PrecedingTitle
Description	Preceding title
Conditions	Optional
Explanation	For example 'His Excellency'
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

Data name	MessageBody - ReportingGroup - AccountReport - SubstantialOwner - Individual - Name - Title
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/SubstantialOwner/Individual/Name/Title
Description	Title
Conditions	Optional
Explanation	For example 'Dr.', but also 'Mrs.', 'Mr.'
Cardinality	0..N
Format	xsd:stringMax200
Domain	A maximum of 200 characters

Data name	MessageBody - ReportingGroup - AccountReport - SubstantialOwner - Individual - Name – FirstName
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/SubstantialOwner/Individual/Name/FirstName
Description	First name
Conditions	Mandatory (for CRS mandatory and for FATCA optional; in FATCA CRS ESRR supply mandatory)
Explanation	FirstName shall be mandatory as from fiscal year 2016 for SubstantialOwner Individual. If SubstantialOwner does not have a first name, then NFN shall be supplied as first name.
Cardinality	1..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

Data name	MessageBody - ReportingGroup - AccountReport – SubstantialOwner - Individual – Name – FirstName – xnlNameType
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/SubstantialOwner/Individual/Name/FirstName@xnlNameType
Description	<p>xnlNameType at FirstName indicates what type of name the FirstName is. Examples are:</p> <ul style="list-style-type: none"> <li>• given name</li> <li>• forename</li> <li>• Christian name</li> <li>• father's name</li> <li>• etc.</li> </ul> <p>In some countries, the FirstName can be a family name or a last name.</p>
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:string
Domain	see Description

Data name	MessageBody- ReportingGroup - AccountReport - SubstantialOwner - Individual - Name - MiddleName
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/SubstantialOwner/Individual/Name/MiddleName
Description	Middle name
Conditions	Optional
Explanation	Is an important part of the name for many nationalities.

Cardinality	0..N
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - SubstantialOwner - Individual – Name – MiddleName – xnlNameType</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/SubstantialOwner/Individual/Name/MiddleName@xnlNameType
Description	xnlNameType at MiddleName indicates what type of name the MiddleName is. Examples are: <ul style="list-style-type: none"> <li>• first name</li> <li>• middle name</li> <li>• maiden name</li> <li>• father's name</li> <li>• given name</li> <li>• etc.</li> </ul>
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:string
Domain	see Description

<b>Data name</b>	<b>MessageBody- ReportingGroup - AccountReport - SubstantialOwner - Individual - Name – NamePrefix</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/SubstantialOwner/Individual/Name/NamePrefix
Description	Name prefix
Conditions	Optional
Explanation	Examples are 'van de ' or 'von'
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - SubstantialOwner - Individual – Name – NamePrefix – xnlNameType</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/SubstantialOwner/Individual/Name/NamePrefix@xnlNameType
Description	xnlNameType at NamePrefix indicates what type of name the NamePrefix is. Examples are: <ul style="list-style-type: none"> <li>• de</li> <li>• van</li> <li>• van de</li> <li>• von</li> <li>• etc.</li> </ul>
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:string
Domain	see Description

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - SubstantialOwner - Individual - Name – LastName</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/SubstantialOwner/Individual/Name/LastName
Description	Last name
Conditions	Mandatory
Explanation	For a SubstantialOwner Individual, the last name is an element that shall be supplied mandatorily.

Cardinality	1..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - SubstantialOwner - Individual – Name – LastName - xnlNameType</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/SubstantialOwner/Individual/Name/LastName@xnlNameType
Description	<p>xnlNameType at LastName indicates what type of name the LastName is. Examples are:</p> <ul style="list-style-type: none"> <li>• father's name</li> <li>• family name</li> <li>• last name</li> <li>• mother's name</li> <li>• etc.</li> </ul> <p>In some countries, the LastName can be a given name or a first name.</p>
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:string
Domain	see Description

<b>Data name</b>	<b>MessageBody – ReportingGroup – AccountReport - SubstantialOwner – Individual – Name – GenerationIdentifier</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/SubstantialOwner/Individual/Name/GenerationIdentifier
Description	Generation identifier
Conditions	Optional
Explanation	For example 'III' or 'Third'
Cardinality	0..N
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - SubstantialOwner - Individual - Name - Suffix</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/SubstantialOwner/ Individual/Name/Suffix
Description	Suffix
Conditions	Optional
Explanation	Example is 'PhD'
Cardinality	0..N
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody-ReportingGroup-AccountReport - SubstantialOwner - Individual - Name – GeneralSuffix</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/SubstantialOwner/Individual/Name/GeneralSuffix
Description	General suffix
Conditions	Optional
Explanation	For example 'retired'
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

A minimum of one address should be supplied and several addresses are possible. An address is supplied:

- as AddressFix (the address is then shown in a number of elements) with optional use of AddressFree as a supplementation to the AddressFix elements
- as AddressFree (free text in one element)

In both cases, the address should have a country code (CountryCode) and address type (AddressType).

Data name	MessageBody-ReportingGroup– AccountReport - SubstantialOwner - Individual - Address – AddressType
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/SubstantialOwner/Individual/Address@AddressType
Description	This element indicates what type of address the SubstantialOwner Individual has.
Conditions	Optional
Explanation	CRS identifies a few address types, namely: <ul style="list-style-type: none"> <li>• <b>OECD301</b> = residential or business</li> <li>• <b>OECD302</b> = residential</li> <li>• <b>OECD303</b> = business</li> <li>• <b>OECD304</b> = registered office</li> <li>• <b>OECD305</b> = unspecified</li> </ul>
Cardinality	0..1
Format	xsd:string (one of the values from Domain)
Domain	The values are: OECD301, OECD302, OECD303, OECD304, OECD305.

Data name	MessageBody-ReportingGroup– AccountReport - SubstantialOwner - Individual - Address – CountryCode
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/SubstantialOwner/Individual/Address/CountryCode
Description	The country code of the country where the SubstantialOwner Individual is established
Conditions	Mandatory (monitoring on appearance in the ISO-3166-1 standard)
Explanation	None
Cardinality	1..1
Format	xsd:string (2 positions) and should comply with ISO-3166-1 standard
Domain	Values according to the ISO-3166-1 standard

**Elements from AddressFix** are Street, BuildingIdentifier, SuiteIdentifier, FloorIdentifier, DistrictName, POB, Postal code, City and CountrySubentity Optional with AddressFree for supplementary information. CRS prefers addresses in the form of an AddressFix representation. Only if there is no other option, then an address in AddressFree representation shall be allowed.

Data name	MessageBody-ReportingGroup–AccountReport-SubstantialOwner-Individual-Address–AddressFix–Street
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/SubstantialOwner/Individual/Address/AddressFix/Street
Description	Street name of the address of the SubstantialOwner Individual
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

Data name	MessageBody - ReportingGroup – AccountReport - SubstantialOwner - Individual - Address – AddressFix – BuildingIdentifier
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/SubstantialOwner/Individual/Address/AddressFix/BuildingIdentifier
Description	Building identifier, if applicable in the address of the SubstantialOwner Individual
Conditions	Optional

Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup – AccountReport - SubstantialOwner - Individual - Address – AddressFix – SuiteIdentifier</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/SubstantialOwner/Individual/Address/AddressFix/SuiteIdentifier
Description	Suite identifier, if applicable in the address of the SubstantialOwner Individual
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - SubstantialOwner - Individual - Address – AddressFix – FloorIdentifier</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/SubstantialOwner/Individual/Address/AddressFix/FloorIdentifier
Description	Floor identifier, if applicable in the address of the SubstantialOwner Individual
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - SubstantialOwner - Individual - Address – AddressFix - Districtname</b>
Xpath (XML)	FATCA_CRS/MessageBody//ReportingGroup/AccountReport/SubstantialOwner/Individual/Address/AddressFix/DistrictName
Description	Name of the district, if applicable in the address of the SubstantialOwner Individual
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - SubstantialOwner - Individual – AddressFix – POB</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/SubstantialOwner/Individual/Address/AddressFix/POB
Description	P.O. Box number, if applicable in the address of the SubstantialOwner Individual
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - SubstantialOwner - Individual - Address – AddressFix – Postal code</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/SubstantialOwner/Individual/Address/AddressFix/Postal code
Description	Postal code, if applicable in the address of the SubstantialOwner Individual
Conditions	Optional

Explanation	In Curaçao, we don't use postal codes. If the country of residence is Curaçao, then the postal code shall be blank.
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup – AccountReport - SubstantialOwner - Individual - Address – AddressFix – City</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/SubstantialOwner/Individual/Address/AddressFix/City
Description	City in the address of the SubstantialOwner Individual
Conditions	Mandatory
Explanation	The city shall be mandatory and is used for validation.
Cardinality	1..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - SubstantialOwner - Individual - Address – AddressFix – CountrySubentity</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/SubstantialOwner/Individual/Address/AddressFix/CountrySubentity
Description	Country subentity, if applicable in the address of the SubstantialOwner Individual
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

**AddressFree** consists of one element (xsd:string).

<b>Data name</b>	<b>MessageBody - ReportingGroup – AccountReport - SubstantialOwner - Individual - Address – AddressFree</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/SubstantialOwner/Individual/Address/AddressFree
Description	Free text description of the address.
Conditions	Optional
Explanation	<ul style="list-style-type: none"> <li>Only to be used if elements from AddressFix cannot be supplied for the SubstantialOwner address (natural person).</li> <li>Or to be used optionally as a supplementation to the data in the AddressFix Format. AddressFree can have a maximum length of 4000 characters.</li> </ul>
Cardinality	0..1
Format	xsd:stringMax4000
Domain	A maximum of 4000 characters

The following element concerns the **nationality** of the SubstantialOwner Individual. This element shall not be utilized for neither FATCA nor CRS and shall as such not be requested to be supplied.

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - SubstantialOwner - Individual – Nationality</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/SubstantialOwner/Individual/Nationality
Description	Nationality of the SubstantialOwner Individual – <b>not to be used(see Explanation)</b>
Conditions	Optional (do not supply)
Explanation	"Standard for Automatic Exchange of Financial Account Information in Tax Matters" of the OECD (page 241) states that 'This data element is not required for CRS and should not be



	<i>completed</i> '. FATCA uses this data in the same way. Reason why it is recorded in the Manual that the data should <u>not be supplied</u> .
Cardinality	0..0 (not to be used)
Format	xsd:string
Domain	n/a

**Birth date** SubstantialOwner Individual shall be enough for FATCA as birth data.

Data name	MessageBody - ReportingGroup - AccountReport - SubstantialOwner - Individual - BirthInfo – BirthDate
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/SubstantialOwner/Individual/BirthInfo/BirthDate
Description	Birth date of SubstantialOwner Individual
Conditions	(optional) mandatory
Explanation	Birth date may be left empty if it's an already existing account and the financial institution is unable to find out the birth date.
Cardinality	0..1
Format	YYYY-MM-DD
Domain	A date in the past

Data name	MessageBody - ReportingGroup - AccountReport - SubstantialOwner - Individual – BirthInfo – City
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/SubstantialOwner/Individual/BirthInfo/City
Description	Place of birth of the SubstantialOwner Individual
Conditions	Optional (and not used for FATCA)
Explanation	Place of birth may be left empty.
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

One of the two elements below shall be supplied if place of birth or place of birth and city district have been filled in. It can be:

- current jurisdiction (country code according to the ISO-3166-1 standard in BirthInfo/CountryInfo/CountryCode) or
- a former jurisdiction (name of the country in BirthInfo/CountryInfo/FormerCountryName).

Data name	MessageBody - ReportingGroup - AccountReport - SubstantialOwner - Individual – BirthInfo – CountryInfo – CountryCode
Xpath (XML)	FATCA_CRS/MessageBody//ReportingGroup/AccountReport/SubstantialOwner/Individual/BirthInfo/CountryInfo/CountryCode
Description	Country of birth of SubstantialOwner Individual
Conditions	Optional (and not used for FATCA)
Explanation	Country code of country of birth is filled in as Place of birth (either with or without City district) and the current jurisdiction is the country of birth.
Cardinality	0..1
Format	xsd:string (2 positions)
Domain	Country code according to the ISO-3166-1 Format

Data name	MessageBody - ReportingGroup - AccountReport - SubstantialOwner - Individual – BirthInfo – CountryInfo – FormerCountryName
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/SubstantialOwner/Individual/BirthInfo/CountryInfo/FormerCountryName
Description	Country of birth of SubstantialOwner Individual

Conditions	Optional (and not used for FATCA)
Explanation	Name of the country of birth is filled in as Place of birth (either with or without City district) and the current jurisdiction is not the country of birth.
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

The following are the fields that have to be used if a **SubstantialOwner Organization** shall be supplied:

<b>Data name</b>	<b>MessageBody - ReportingGroup – SubstantialOwner - Organization - ResCountryCode</b>
Xpath (XML)	FATCA_CRS/ MessageBody/ReportingGroup/SubstantialOwner/Organization/ResCountryCode
Description	The country code of the tax residence of the SubstantialOwner Organization
Conditions	There is a substantial owner (see introduction paragraph 6.3.2.3.3).
Explanation	The SubstantialOwner is a US-person and the tax residence is the US.
Cardinality	1..1
Format	xsd:string (is completed with US, this is data for the FATCA and it concerns a US-person)
Domain	Country code has to comply with ISO-3166-1

<b>Data name</b>	<b>MessageBody - ReportingGroup – SubstantialOwner - Organization – TIN</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/SubstantialOwner/Organization/TIN
Description	It concerns the TIN of the Substantial Owner Organization in the US. Substantial Owner shall only be used in case of supply of FATCA-data.
Conditions	Mandatory
Explanation	A SubstantialOwner Organization has exactly one TIN, because SubstantialOwner Organization only has US as TIN@Issued_By. The XML schedule, due to inheritance, does not allow any or more TIN at Substantial Owner.
Cardinality	1..1 (if there is a SubstantialOwner Organization)
Format	xsd:stringMax200 (the Format of the TIN in USA is 999999999 of 999-99-9999 of 99-99999999)
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup – SubstantialOwner - Organization - TIN – IssuedBy</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/SubstantialOwner/Organization/TIN@IssuedBy
Description	Description of the jurisdiction that has issued the TIN
Conditions	Mandatory if TIN was filled in
Explanation	SubstantialOwner shall only be identified by the FATCA, so: if TIN was filled in then TIN_IssuedBy shall be equal to US.
Cardinality	1..1 (mandatorily filled in if TIN was filled in; otherwise not available)
Format	xsd:string (2 positions)
Domain	Country code has to comply with ISO-3166-1 (due to the definition of SubstantialOwner Organization, always equal to the US)

In the XML report schedule FATCA CRS, the TIN-attribute INType is still not included at OrganizationParty\_Type.

In the CRS report schedule, INType appears as an optional attribute of IN.

For a SubstantialOwner Organization, one name shall be mandatory and several names shall be possible.

The following elements form the **name** of a SubstantialOwner Organization.

<b>Data name</b>	<b>MessageBody - ReportingGroup - SubstantialOwner - Organization – Name</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/SubstantialOwner/Organization/Name
Description	The legal name of the SubstantialOwner Organization
Conditions	Mandatory
Explanation	None

Cardinality	1..N
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup – SubstantialOwner - Organization – Name – NameType</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/SubstantialOwner/Organization/Name@NameType
Description	Characterization of the name of the SubstantialOwner Organization
Conditions	Optional
Explanation	<p>Element is also used by FATCA as from fiscal year 2016 and thus available in SubstantialOwner Organization. OECD201 is reserved for SMFAliasOrOther and shall not be used.</p> <p>The following name types are identified:</p> <ul style="list-style-type: none"> <li>• <b>OECD202</b> = individual</li> <li>• <b>OECD203</b> = alias</li> <li>• <b>OECD204</b> = nick (nickname)</li> <li>• <b>OECD205</b> = AKA (also known as)</li> <li>• <b>OECD206</b> = DBA (doing business as)</li> <li>• <b>OECD207</b> = legal</li> <li>• <b>OECD208</b> = name at birth</li> </ul>
Cardinality	0..1
Format	xsd:string
Domain	Values are: OECD202, OECD203, OECD204, OECD205, OECD206, OECD207, OECD208

A minimum of one address should be supplied and several addresses are possible. An address is supplied:

- as AddressFix (the address is then shown in a number of elements) with optional use of AddressFree as a supplementation to the AddressFix elements
- as AddressFree (free text in one element)

In both cases, the address should have a country code (CountryCode) and address type (AddressType).

<b>Data name</b>	<b>MessageBody - ReportingGroup – SubstantialOwner - Organization - Address – AddressType</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/SubstantialOwner/Organization/Address@AddressType
Description	This element indicates what type of address, the address of the SubstantialOwner Organization is
Conditions	Optional
Explanation	<p>CRS identifies a few types of address, namely:</p> <ul style="list-style-type: none"> <li>• <b>OECD301</b> = residential or business</li> <li>• <b>OECD302</b> = residential</li> <li>• <b>OECD303</b> = business</li> <li>• <b>OECD304</b> = registered office</li> <li>• <b>OECD305</b> = unspecified</li> </ul>
Cardinality	0..1
Format	xsd:string (one of the values from Domain)
Domain	The values are: OECD301, OECD302, OECD303, OECD304, OECD305.

<b>Data name</b>	<b>MessageBody - ReportingGroup – SubstantialOwner - Organization - Address – CountryCode</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/SubstantialOwner/Organization/Address/CountryCode
Description	The country code of the country where the SubstantialOwner Organization is established
Conditions	Mandatory (monitoring on appearance in the ISO-3166-1 standard)
Explanation	Country code of the country, where the SubstantialOwner Organization is established (in accordance with ISO-3166-1 standard).
Cardinality	1..1
Format	xsd:string (a value from the ISO-3166-1 standard)

Domain	Value range van ISO-3166-1 standard
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**Elements from AddressFix** are Street, BuildingIdentifier, SuiteIdentifier, FloorIdentifier, DistrictName, POB, Postal code, City and CountrySubentity Optional with AddressFree for supplementary information. CRS prefers addresses in the form of an AddressFix representation. Only if there is no other option, then an address in AddressFree representation shall be allowed.

<b>Data name</b>	<b>MessageBody - ReportingGroup – SubstantialOwner - Organization - Address – AddressFix – Street</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/SubstantialOwner/Organization/Address/AddressFix/Street
Description	Street name of the address of the SubstantialOwner Organization
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody – ReportingGroup – SubstantialOwner – Organization – Address – AddressFix –BuildingIdentifier</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/SubstantialOwner/Organization/Address/AddressFix/BuildingIdentifier
Description	Building identifier, if applicable in the address of the SubstantialOwner Organization
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup – SubstantialOwner - Organization – Address – AddressFix - SuiteIdentifier</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/SubstantialOwner/Organization/Address/AddressFix/SuiteIdentifier
Description	Suite identifier, if applicable in the address of the SubstantialOwner Organization
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup - SubstantialOwner - Organization – Address – AddressFix - FloorIdentifier</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/SubstantialOwner/Organization/Address/AddressFix/FloorIdentifier
Description	Floor identifier, if applicable in the address of the SubstantialOwner Organization
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup - SubstantialOwner - Organization – Address – AddressFix - Districtname</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/SubstantialOwner/Organization/Address

	/AddressFix/DistrictName
Description	District name, if applicable in the Address of the SubstantialOwner Organization
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup - SubstantialOwner - Organization – Address – AddressFix - POB</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/SubstantialOwner/Organization/Address/AddressFix/POB
Description	P.O. Box number, if applicable in the address of the SubstantialOwner Organization
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup - SubstantialOwner - Organization – Address – AddressFix - Postal code</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/SubstantialOwner/Organization/Address/AddressFix/Postal code
Description	Postal code, if applicable in the address of the SubstantialOwner Organization
Conditions	Optional
Explanation	In Curaçao, we don't use postal codes. So, this element shall be blank. If the country of residence is Curaçao, then the Postal code shall be blank.
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup – SubstantialOwner - Organization – Address – AddressFix – City</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/SubstantialOwner/Organization/Address/AddressFix/City
Description	City in the address of the SubstantialOwner Organization
Conditions	Mandatory
Explanation	The city shall be mandatory and is used for validation
Cardinality	1..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody-ReportingGroup-SubstantialOwner-Organization–Address–AddressFix-CountrySubentity</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/SubstantialOwner/Organization/Address/AddressFix/CountrySubentity
Description	Country subentity, if applicable in the address of the SubstantialOwner Organization
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

**AddressFree** consists of one element (xsd:string).

<b>Data name</b>	<b>MessageBody - ReportingGroup – SubstantialOwner - Organization - Address – AddressFree</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/SubstantialOwner/Organization/Address/AddressFree
Description	Free text description of the address.

Conditions	Optional
Explanation	<ul style="list-style-type: none"> <li>Only to be used if the elements from AddressFix cannot be supplied for the address of the SubstantialOwner Organization.</li> <li>Or to be used optionally as a supplementation on the data in the AddressFix Format. AddressFree can have a maximum length of 4000 characters.</li> </ul>
Cardinality	0..1
Format	xsd:stringMax4000
Domain	A maximum of 4000 characters

#### 6.3.2.3.4. AccountReport – ControllingPerson (only intended for CRS)

ControllingPerson is not used for FATCA. It can only be used for AccountReports with CRS-data. Controlling Person(s) is (are) mandatory if AcctHolderTypeCRS in AccountReport is equal to CRS101; the Accountholder Organization is a Passive NFE<sup>5</sup>. If there are several ControllingPersons, then all ControllingPersons have to be reported.

ControllingPerson(s) can be seen as natural person(s), that exercise control over an entity. In the case of a Trust, this can be the founder, the trustee, the protector, the beneficiary or group of beneficiaries and other natural persons, who actually exercise the full control over the Trust for a Passive NFE. In case of a different legal regulation from a Trust, this can be a person or persons in a comparable or similar position(s).

If the ControllingPerson is not a resident of the country of establishment of the Entity, then the information about the account should still be provided.

The following data should be supplied for each ControllingPerson:

- **ResCountryCode(s)**
- **TIN** (Tax Identification Number) within each ResCountryCode, consisting of :
  - the identification as such,
  - IssuedBy
- **Name or names** of the ControllingPerson (a minimum of one name shall be mandatory and several names shall be possible), consisting of :
  - A type indication of that name
  - Previous Title
  - Title
  - First name
  - Infix
  - Prefix
  - Last name
  - Generation identification
  - Suffix
  - General Suffix
- **Address(es)** of the ControllingPerson (a minimum of one address and several shall be possible), consisting of :
  - the countrycode

<sup>5</sup> Passive NFE = Passive Non-Financial Entity

- a type indication of the address
- the address as such
  - in a fixed Format (optionally supplemented with AddressFree for supplementation) with the following attributes:
    - street
    - building identifier
    - suite identifier
    - floor identifier
    - district name
    - P.O. Box
    - Postal code
    - city
    - country subentity
  - of free format (AddressFree)
    - the address as xsd:string
- **Nationality** (shall not be used)
- **Birth data** of the ControllingPerson, consisting of :
  - Birth date
  - Place of birth
  - City district Place of birth
  - Country of birth information
  - Country of birth (code) in case the current jurisdiction is the country of birth
  - Country of birth (name) in case the current jurisdiction is not the country of birth

Data name	MessageBody - ReportingGroup – AccountReport - ControllingPerson - Individual – ResCountryCode
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/ControllingPerson/Individual/ResCountryCode
Description	The country code(s) of the jurisdiction of residence of the ControllingPerson (a natural person).
Conditions	In case of a Passive NFE, there is one or several Controlling Persons. For each jurisdiction of residence, the account data of the Passive NFE shall be supplied with all Controlling Persons with that same jurisdiction of residence.
Explanation	For each jurisdiction of residence of one or more Controlling Persons, an AccountReport shall be supplied with accountdata of the Passive NFE and other related data. This only applies to CRS-supplies. A Controlling Person can have more than one jurisdiction of residence.
Cardinality	1..N (always one element supplied)
Format	xsd:string (2 positions)
Domain	Country code has to comply with ISO-3166-1 (with the exception of US)

The following elements form the **Tax Identification Number (TIN)** of the ControllingPerson (natural person).

Data name	MessageBody - ReportingGroup – AccountReport - ControllingPerson - Individual – TIN
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/ControllingPerson/Individual/TIN
Description	The Tax Identification Number, as provided in the Jurisdiction of Residence of the ControllingPerson (a natural person) to him/her. For each ResCountryCode, a TIN if known in the administration of the financial institution.  Controlling person is used in case of supply of CRS data.

Conditions	Optional Mandatory (mandatory, if available in the administration of the financial institution)
Explanation	None
Cardinality	0..N (if available in the administration of the financial institution)
Format	xsd:stringMax200 (format of TIN in MCAA-countries is significantly shorter than 200 characters)
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup – AccountReport - ControllingPerson - Individual - TIN – IssuedBy</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/ControllingPerson/Individual/TIN@IssuedBy
Description	Description of the jurisdiction that issued the TIN
Conditions	Mandatory if there is a TIN
Explanation	None
Cardinality	1..1 (mandatory if TIN will be supplied; if the TIN will not be supplied, then also no TIN@IssuedBy)
Format	xsd:string (2 positions)
Domain	Country code has to comply with ISO-3166-1

For a ControllingPerson one name (with attributes) shall be mandatory and several names (with attributes) shall be possible. The following elements form the **name** of the ControllingPerson (a natural person).

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - ControllingPerson - Individual – Name – NameType</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/ControllingPerson/Individual/Name@NameType
Description	Type of name with the following possible values: <ul style="list-style-type: none"> <li>• <b>OECD202</b> = indiv</li> <li>• <b>OECD203</b> = alias</li> <li>• <b>OECD204</b> = nick</li> <li>• <b>OECD205</b> = AKA (also known as)</li> <li>• <b>OECD206</b> = DBA (does business as)</li> <li>• <b>OECD207</b> = legal</li> <li>• <b>OECD208</b> = name at birth</li> </ul>
Conditions	Optional
Explanation	Element shall be used for CRS and shall not be used for FATCA. Controlling Person is a CRS datagroup. OECD201 (reserved for SMFAliasOrOther) shall not be used.
Cardinality	0..1
Format	xsd:string
Domain	Value range is: OECD202, OECD203, OECD204, OECD205, OECD206, OECD207, OECD208

<b>Data name</b>	<b>MessageBody-ReportingGroup-AccountReport-ControllingPerson-Individual – Name – Preceding Title</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/ControllingPerson/Individual/Name/Preceding Title
Description	Preceding title
Conditions	Optional
Explanation	For example 'His Excellency'
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters



Data name	MessageBody - ReportingGroup - AccountReport - ControllingPerson - Individual – Name - Title
Xpath (XML)	FATCA_CRS/ReportingGroup/AccountReport/ControllingPerson/Individual/Name/Title
Description	Title
Conditions	Optional
Explanation	For example 'Dr.', but also 'Mrs.', 'Mr.'
Cardinality	0..N
Format	xsd:stringMax200
Domain	A maximum of 200 characters

Data name	MessageBody - ReportingGroup - AccountReport - ControllingPerson - Individual – Name – FirstName
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/ControllingPerson/Individual/Name/FirstName
Description	First name
Conditions	FirstName shall be mandatory for Controlling Person. If the ControllingPerson does not have a first name, then 'NFN' should be filled in as first name.
Explanation	None
Cardinality	1..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

Data name	MessageBody - ReportingGroup - AccountReport – ControllingPerson - Individual – Name – FirstName – xnlNameType
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/ControllingPerson/Individual/Name/FirstName@xnlNameType
Description	<p>xnlNameType at FirstName indicates what type of name the FirstName is. Examples are:</p> <ul style="list-style-type: none"> <li>• given name</li> <li>• forename</li> <li>• Christian name</li> <li>• father's name</li> <li>• etc.</li> </ul> <p>In some countries, the FirstName can be a family name or a last name.</p>
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:string
Domain	see Description

Data name	MessageBody-ReportingGroup - AccountReport - ControllingPerson - Individual – Name – MiddleName
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/ControllingPerson/Individual/Name/MiddleName
Description	Middle name
Conditions	Optional
Explanation	Is an important part of the name for many nationalities.
Cardinality	0..N
Format	xsd:stringMax200
Domain	A maximum of 200 characters

Data name	MessageBody - ReportingGroup - AccountReport - ControllingPerson - Individual – Name – MiddleName – xnlNameType
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/ControllingPerson/Individual/Name/MiddleName@xnlNameType
Description	<p>xnlNameType at MiddleName indicates what type of name the MiddleName is. Examples are:</p> <ul style="list-style-type: none"> <li>• first name</li> <li>• middle name</li> </ul>

	<ul style="list-style-type: none"> <li>• maiden name</li> <li>• father's name</li> <li>• given name</li> <li>• etc.</li> </ul>
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:string
Domain	see Description

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - ControllingPerson - Individual – Name – NamePrefix</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/ControllingPerson/Individual/Name/NamePrefix
Description	NamePrefix
Conditions	Optional
Explanation	Examples are 'van de ' or 'von'
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - ControllingPerson - Individual – Name – NamePrefix – xnlNameType</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/ControllingPerson/Individual/Name/NamePrefix@xnlNameType
Description	xnlNameType at NamePrefix indicates what type of name the NamePrefix is. Examples are: <ul style="list-style-type: none"> <li>• de</li> <li>• van</li> <li>• van de</li> <li>• von</li> <li>• etc.</li> </ul>
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:string
Domain	see Description

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - ControllingPerson - Individual – Name – LastName</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/ControllingPerson/Individual/Name/LastName
Description	Last name
Conditions	Mandatory
Explanation	For a ControllingPerson (natural person), the last name is a mandatory element to be supplied.
Cardinality	1..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - ControllingPerson - Individual – Name – LastName – xnlNameType</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/ControllingPerson/Individual/Name/LastName@xnlNameType
Description	xnlNameType at LastName indicates what type of name the LastName is. Examples are: <ul style="list-style-type: none"> <li>• father's name</li> <li>• family name</li> </ul>

	<ul style="list-style-type: none"> <li>last name</li> <li>mother's name</li> <li>etc.</li> </ul> <p>In some countries, the LastName can be a given name or a first name.</p>
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:string
Domain	see Description

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - ControllingPerson - Individual – Name - GenerationIdentifier</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/ControllingPerson/Individual/Name/GenerationIdentifier
Description	Generation identifier
Conditions	Optional
Explanation	For example 'III' or 'Third'
Cardinality	0..N
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - ControllingPerson - Individual – Name - Suffix</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/ControllingPerson/Individual/Name/Suffix
Description	NameSuffix
Conditions	Optional
Explanation	Example is 'PhD'
Cardinality	0..N
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody-ReportingGroup-AccountReport - ControllingPerson - Individual – Name – GeneralSuffix</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/ControllingPerson/Individual/Name/GeneralSuffix
Description	General Suffix
Conditions	Optional
Explanation	For example 'retired'
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

A minimum of one address should be supplied and several addresses shall be possible. An address shall be supplied:

- as AddressFix (the address is then represented in a few elements) with optional use of AddressFree for supplementation on the AddressFix elements
- as AddressFree (free text in one element)

In both cases, the address should mention the country code (CountryCode) and address type (AddressType).

Data name	MessageBody-ReportingGroup–AccountReport-ControllingPerson - Individual - Address – AddressType
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/ControllingPerson/Individual/Address@AddressType
Description	This element indicates what type of address, the ControllingPerson (natural person) address is.
Conditions	Optional
Explanation	CRS identifies a few types of address, namely: <ul style="list-style-type: none"> <li>• <b>OECD301</b> = residential or business</li> <li>• <b>OECD302</b> = residential</li> <li>• <b>OECD303</b> = business</li> <li>• <b>OECD304</b> = registered office</li> <li>• <b>OECD305</b> = unspecified</li> </ul>
Cardinality	0..1
Format	xsd:string (one of the values from Domain)
Domain	The values are: OECD301, OECD302, OECD303, OECD304, OECD305.

Data name	MessageBody-ReportingGroup–AccountReport-ControllingPerson - Individual - Address – CountryCode
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/ControllingPerson/Individual/Address/CountryCode
Description	The country code of the country where the ControllingPerson (natural person) is established.
Conditions	Mandatory (monitoring on appearance in the ISO-3166-1 standard)
Explanation	None
Cardinality	1..1
Format	xsd:string (2 positions) and complies with the ISO-3166-1 standard
Domain	Values according to the ISO-3166-1 standard

**Elements from AddressFix** are Street, BuidingIdentifier, SuitIdentifier, FloorIdentifier, DistrictName, POB, Postal code, City and CountrySubentity Optional with AddressFree for supplementary information. CRS prefers addresses in the form of an AddressFix representation. Only if there is no other option, then an address in AddressFree representation shall be allowed.

Data name	MessageBody - ReportingGroup – AccountReport - ControllingPerson - Individual - Address – AddressFix – Street
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/ControllingPerson/Individual/Address/ AddressFix/Street
Description	Street name of the ControllingPerson (natural person) address.
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

Data name	MessageBody - ReportingGroup – AccountReport - ControllingPerson - Individual – Address – AddressFix – BuildingIdentifier
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/ControllingPerson/Individual/Address/AddressFix/BuildingIdentifier
Description	Building identifier, if applicable in the ControllingPerson (natural person) address.
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

Data name	MessageBody - ReportingGroup – AccountReport - ControllingPerson - Individual – Address – AddressFix – SuiteIdentifier
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/ControllingPerson/Individual/Address/AddressFix/SuiteIdentifier
Description	Suite identifier, if applicable in the ControllingPerson (a natural person) address.
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

Data name	MessageBody - ReportingGroup - AccountReport - ControllingPerson - Individual – Address – AddressFix – FloorIdentifier
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/ControllingPerson/Individual/Address/AddressFix/FloorIdentifier
Description	Floor identifier, if applicable in the ControllingPerson (natural person) address.
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

Data name	MessageBody - ReportingGroup - AccountReport - ControllingPerson - Individual – Address – AddressFix – DistrictName
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/ControllingPerson/Individual/Address/AddressFix/DistrictName
Description	Name of the district, if applicable in ControllingPerson (natural person) address.
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

Data name	MessageBody - ReportingGroup - AccountReport - ControllingPerson - Individual – Address – AddressFix – POB
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/ControllingPerson/Individual/Address/AddressFix/POB
Description	P.O. Box number, if applicable in the ControllingPerson (natural person) address.
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

Data name	MessageBody - ReportingGroup - AccountReport - ControllingPerson - Individual – Address – AddressFix – Postal code
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/ControllingPerson/Individual/Address/AddressFix/Postal code
Description	Postal code, if applicable in the ControllingPerson (natural person) address.
Conditions	Optional
Explanation	In Curaçao, we don't use postal codes. If the country of residence is Curaçao, then the Postal code shall be blank.
Cardinality	0..1

Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody-ReportingGroup–AccountReport-ControllingPerson-Individual–Address–AddressFix–City</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/ControllingPerson/Individual/Address/AddressFix/City
Description	City in the ControllingPerson (natural person) address.
Conditions	Mandatory
Explanation	The city shall be mandatory and shall be used for validation.
Cardinality	1..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - ControllingPerson - Individual – Address – AddressFix - CountrySubentity</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/ControllingPerson/Individual/Address/AddressFix/CountrySubentity
Description	Country subentity, if applicable in the ControllingPerson (natural person) address.
Conditions	Optional
Explanation	None
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

**AddressFree** consists of one element (xsd:string).

<b>Data name</b>	<b>MessageBody - ReportingGroup – AccountReport - ControllingPerson - Individual – Address – AddressFree</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/ControllingPerson/Individual/Address/AddressFree
Description	Free text description of the address.
Conditions	Optional
Explanation	<ul style="list-style-type: none"> <li>Only to be used if elements from AddressFix cannot be supplied for the address of the ControllingPerson (natural person).</li> <li>Or to be used optionally as a supplementation to the data in the AddressFix Format. AddressFree can have a maximum length of 4000 characters.</li> </ul>
Cardinality	0..1
Format	xsd:stringMax4000
Domain	A maximum of 4000 characters

The following element concerns the **nationality** of the ControllingPerson (a natural person). This element shall not be utilized for neither FATCA nor CRS and shall as such not be requested to be supplied.

<b>Data name</b>	<b>MessageBody- ReportingGroup - AccountReport - ControllingPerson - Individual – Nationality</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/ControllingPerson/Individual/Nationality
Description	Nationality of the ControllingPerson (natural person) – <b>not to be used(see Explanation)</b>
Conditions	Optional (do not supply)
Explanation	"Standard for Automatic Exchange of Financial Account Information in Tax Matters" of the OECD (page 241) states that 'This data element is not required for CRS and should not be completed'. FATCA uses this data in the same way. Reason why it is recorded in the Manual that the data should <u>not be supplied</u> .

Cardinality	0..0 (not to be used)
Format	xsd:string
Domain	n/a.

The following elements form the **birth data** of the Controlling Person (a natural person).

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - AccountHolder - Individual – BirthInfo – BirthDate</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/BirthInfo/BirthDate
Description	Birth date of AccountHolder (natural person)
Conditions	(Optional) Mandatory
Explanation	Birth date may be left empty if it's an already existing account and the financial institution is unable to find out the birth date.
Cardinality	0..1
Format	YYYY-MM-DD
Domain	A date in the past

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - AccountHolder - Individual – BirthInfo – City</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AccountHolder/Individual/BirthInfo/City
Description	Place of birth of AccountHolder (natural person)
Conditions	Optional (and not used for FATCA)
Explanation	Place of birth may be left empty.
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

One of the two following elements shall be supplied in a completed form if place of birth or place of birth and city district have been filled in. It can be:

- the current jurisdiction (country code according to the ISO-3166-1 standard in BirthInfo/CountryInfo/CountryCode) or
- a former jurisdiction (name of the country in BirthInfo/CountryInfo/FormerCountryName).

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - ControllingPerson - Individual – BirthInfo – CountryInfo – CountryCode</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/ControllingPerson/Individual/BirthInfo/CountryInfo/CountryCode
Description	Country of birth of ControllingPerson (natural person)
Conditions	Optional (and not used for FATCA)
Explanation	Country code of country of birth is filled in if Place of birth (whether or not with City district) is filled in and the current jurisdiction is the country of birth.
Cardinality	0..1
Format	xsd:string (2 positions)
Domain	Country code according to the ISO-3166-1 Format

Data name	MessageBody - ReportingGroup - AccountReport - ControllingPerson - Individual – BirthInfo – CountryInfo – FormerCountryName
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/ControllingPerson/Individual/BirthInfo/CountryInfo/FormerCountryName
Description	Country of birth of ControllingPerson (natural person)
Conditions	Optional (and not used for FATCA)
Explanation	Name of the country of birth is filled in if Place of birth (whether or not with City district) is filled in and the current jurisdiction is not the country of birth.
Cardinality	0..1
Format	xsd:stringMax200
Domain	A maximum of 200 characters

The following element represents the **type of ControllingPerson**.

Data name	MessageBody - ReportingGroup – AccountReport - ControllingPerson - CtrlgPersonType
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/ControllingPerson/CtrlgPersonType
Description	This element indicates what type of ControllingPerson it is
Conditions	(Optional) Mandatory
Explanation	<p>CRS identifies a few types of controlling persons, namely:</p> <ul style="list-style-type: none"> <li>• <b>CRS801</b> = Controlling person of legal person - ownership</li> <li>• <b>CRS802</b> = Controlling person of legal person – other means</li> <li>• <b>CRS803</b> = Controlling person of legal person – senior managing official</li> <li>• <b>CRS804</b> = Controlling person of legal arrangement - trust - settlor</li> <li>• <b>CRS805</b> = Controlling person of legal arrangement - trust – trustee</li> <li>• <b>CRS806</b> = Controlling person of legal arrangement - trust – protector</li> <li>• <b>CRS807</b> = Controlling person of legal arrangement - trust - beneficiary</li> <li>• <b>CRS808</b> = Controlling person of legal arrangement - trust – other</li> <li>• <b>CRS809</b> = Controlling person of legal arrangement - other – settlor-equivalent</li> <li>• <b>CRS810</b> = Controlling person of legal arrangement - other – trustee-equivalent</li> <li>• <b>CRS811</b> = Controlling person of legal arrangement - other – protector-equivalent</li> <li>• <b>CRS812</b> = Controlling person of legal arrangement - other – beneficiary-equivalent</li> <li>• <b>CRS813</b> = Controlling person of legal arrangement - other – other-equivalent</li> </ul>
Cardinality	0..1 (if there is a controlling person, then this element shall be mandatory)
Format	xsd:string (one of the values from Domain)
Domain	The values are: CRS801, CRS802, CRS803, CRS804, CRS805, CRS806, CRS807, CRS808, CRS809, CRS810, CRS811, CRS812, CRS813.

#### 6.3.2.3.5. AccountReport - Account balance

Balance as from 31-12 of the year that is being reported on.

Data name	MessageBody - ReportingGroup - AccountReport – Account balance
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/Account balance
Description	Balance of value as from final date of the ReportingPeriod (often 31-12)
Conditions	Mandatory (validation )
Explanation	<p>Definition of Account balance depends on the type of account:</p> <ul style="list-style-type: none"> <li>• For <u>depository and custodial accounts</u>: balance of value as from 31-12.</li> <li>• For <u>cash value and annuity contracts</u>: cash value insurance of the annuity contract as from 31-12.</li> <li>• For <u>debt of equity accounts</u>: value of debt of equity interest, that the accountholder has in the financial institution</li> </ul>



	<p>If the account was terminated during the ReportingPeriod, supply the balance that was applicable right before the termination of the account. The termination of the Account shall be indicated at AccountNumber@ClosedAccount.</p> <p>PFGU shall take care of the right provision to the USA (IRS) and MCAA-countries:</p> <ul style="list-style-type: none"> <li>• If an Account was terminated during the year: <ul style="list-style-type: none"> <li>○ then the Inspectorate shall provide to the IRS, the Account balance and Payments if the Account balance &gt; \$ 50.000. In addition, AccountClosed = 'true' shall be provided.</li> <li>○ then the Inspectorate shall provide to MCAA-countries, Account balance = 0 and the Payments and in addition AccountNumber@ClosedAccount = 'true'</li> </ul> </li> <li>• If, as from 31-12, there is an Account balance: <ul style="list-style-type: none"> <li>○ then the Inspectorate shall provide to the IRS, the Account balance and Payments if the Account balance &gt; \$ 50.000. If that is not the case, then nothing shall be supplied.</li> <li>○ then the Inspectorate shall provide to MCAA-countries, the Account balance and Payments, regardless of the level of the Account balance.</li> </ul> </li> </ul>
Cardinality	1..1
Format	Numerical with 2 decimals (cfc:MonAmnt_Type). Format is ..999.99 (a point as a separator) Maximum value not more than 1 with 16 zeros before the point (separator in front of decimals).
Domain	n/a.

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - Account balance – Account balance - CurrCode</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/Account balance/Account balance@CurrCode
Description	Currency code
Conditions	Mandatory
Explanation	None
Cardinality	1..1
Format	Xsd:string (3 positions in accordance with ISO-4217 Alpha 3)
Domain	Value range: all currency codes from ISO-4217 Alpha 3

#### 6.3.2.3.7. AccountReport - Payment

Proceeds in the year that is being reported on.

Payment can appear 0..N times. If Payment appears, then the following should be supplied:

- PaymentType,
- PaymentAmnt,
- PaymentAmnt@CurrCode.

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - Payment - PaymentType</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/Payment/PaymentType
Description	<p>As from fiscal year 2016, PaymentType, in terms of value range is equal to the value range as applicable for FATCA and CRS. For fiscal year 2014 and 2015, the value range was further differentiated because of the ESRR-supply.</p> <p>The PaymentType values are then as follows:</p> <ul style="list-style-type: none"> <li>• <b>CRS501</b> = Dividends</li> <li>• <b>CRS502</b> = Interest</li> <li>• <b>CRS502</b> = Gross revenue and Repayment</li> <li>• <b>CRS504</b> = Other (for example, income generated by holding shares in account)</li> </ul>
Conditions	Mandatory for each Payment provided

Explanation	n/a.
Cardinality	1..1 (Mandatory for each Payment; payment can appear 0..N)
Format	xsd:string
Domain	Value range: CRS501, CRS502, CRS503, CRS504

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - Payment - PaymentAmnt</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/Payment/PaymentAmnt
Description	Proceeds in the ReportingPeriod for the Account
Conditions	Mandatory for each Payment provided
Explanation	<p>Proceeds (Payment) depends on the type of account:</p> <ul style="list-style-type: none"> <li>For <u>depository accounts</u>: aggregate gross amount of interest paid or credited on the account during the ReportingPeriod.</li> <li>For <u>custodial accounts</u>: <ul style="list-style-type: none"> <li>aggregate gross amount of dividends paid or credited on the account during the ReportingPeriod.</li> <li>aggregate gross amount of interest paid or credited on the account during the ReportingPeriod.</li> <li>aggregate gross proceeds from sale or repayment of a property paid or credited on the account during the ReportingPeriod related to that part for which the ReportingFI acts as custodian, broker, nominee or otherwise as an agent.</li> <li>aggregate gross amount of all other income paid or credited on the account during the ReportingPeriod.</li> </ul> </li> <li>For <u>debt of equity accounts</u>: aggregate gross amount of payments or credits on the account during the ReportingPeriod.</li> <li>For <u>cash value insurance and annuity contract accounts</u>: aggregate gross amount of payments or credits including repayment on the account during the ReportingPeriod.</li> </ul>
Cardinality	1..1 (Mandatory for each payment; payment can appear 0..N)
Format	Numerical with 2 decimals (cfc:MonAmnt_Type). Format is ..999.99 (a point as a separator) Maximum value not more than 1 with 16 zeros before the point (separator in front of decimals).
Domain	n/a.

<b>Data name</b>	<b>MessageBody - ReportingGroup - AccountReport - Payment - PaymentAmnt - CurrCode</b>
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/Payment/PaymentAmnt@CurrCode
Description	Currency code
Conditions	Mandatory for each Payment provided
Explanation	If there is a payment amount, then CurrCode shall be mandatory (for each payment account a CurrCode)
Cardinality	1..1 (Mandatory for each Payment; payment can appear 0..N)
Format	Xsd:string (3 positions in accordance with ISO-4217 Alpha 3)
Domain	Value range: all currency codes from ISO-4217 Alpha 3

#### 6.3.2.3.6. Additional Data

Additional Data is new in the FATCA CRS XML report schedule version 2.0 and was included because the FATCA XML report schedule version 2.0 contains this new datagroup.

Additional Data is supplementary information within an AccountReport and is **Optional**. Additional Data consists of a few Additional Items (**A maximum of 100** Additional Items). An Additional Item consists of :

- ItemName and
- ItemContent.

Data name	MessageBody - ReportingGroup - AccountReport – Additional Data – AdditionalItem - ItemName
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AdditionalData/AdditionalItem/ItemName
Description	The name of the Additional Item
Conditions	Mandatory if the choice was made for an Additional Item as part of Additional Data (A maximum of 100 additional items)
Explanation	None
Cardinality	1..1 (if the choice was made for an Additional Item as part of Additional Data)
Format	Xsd:stringMax200
Domain	A maximum of 200 characters

Data name	MessageBody - ReportingGroup - AccountReport – Additional Data – AdditionalItem - ItemContent
Xpath (XML)	FATCA_CRS/MessageBody/ReportingGroup/AccountReport/AdditionalData/AdditionalItem/ItemContent
Description	The content of the Additional Item
Conditions	Mandatory if the choice was made for an Additional Item as part of Additional Data (A maximum of 100 additional items)
Explanation	None
Cardinality	1..1 (if the choice was made for an Additional Item as part of Additional Data)
Format	Xsd:stringMax4000
Domain	A maximum of 4000 characters

## 7. Notifications on data level received from the USA and MCAA-countries

USA and MCAA-countries send notifications to the Inspectorate about provided data. These notifications are on report level and data level.

**Notifications on report level** shall be processed **by the Inspectorate**.

Notifications on data level shall be collected by the PFGU and made available to the financial institutions and Sponsors who provided the data with errors. **Notifications on data level** shall be processed in two steps:

**1. Notifications of the USA and MCAA-countries to the Inspectorate:**

Notifications on data level of the USA and MCAA-countries shall be recorded by the Inspectorate in PFGU and made available (see 2) to the financial institutions and Sponsors who provided the data.

**2. Provision of notifications by the Inspectorate to financial institutions:**

Financial institutions and Sponsors who provided data with errors, shall receive an e-mail alert and can consult the notifications in PFGU based on data and ReportingFI.

FATCA and CRS partially recognize the same notifications and partially recognize other notifications. Annex 6 includes an integrated overview of FATCA and CRS notifications. Supplying FI's and Sponsors shall receive notifications on data level such as those that are received from the USA and/or MCAA-countries by the Inspectorate. Annex 6 concerns all notifications and also integrated notifications on data level of the USA and MCAA-countries.

For the FATCA notifications, reference is made to <https://www.irs.gov/Businesses/Corporations/FATCA-XML-Schemas-and-Business-Rules-for-Form-8966> : 'International Compliance Management Model (ICMM) Notification User Guide' (publication 5189 – rev 8-2015) and 'International Compliance Management Model (ICMM) Notification XML Schedule User Guide' (publication 5216 – rev. 8-2015).

For the CRS notifications, reference is made to <http://www.oecd.org/tax/exchange-of-tax-information/common-reporting-standard-status-message-xml-schema-user-guide-for-tax-administrations.htm>

If there are notifications, then the relevant FI or Sponsor shall receive an e-mail (alert) that the content of the notifications are available for inspection in the PFGU.

Only mutually between countries we can speak of XML notification reports.

## ***Annex 1: article 1 paragraph ee, paragraph ff (US persons) + article 2 part a paragraph 2 (data supply)***

### **Definition of US-persons for whom financial data have to be supplied<sup>6</sup>**

1. For purposes of this agreement and any annexes thereto ("Agreement"), the following terms shall have the meanings set forth below:

#### **dd)**

The term "Account Holder" means the person listed or identified as the holder of a Financial Account by the Financial Institution that maintains the account. A person, other than a Financial Institution, holding a Financial Account for the benefit or account of another person as agent, custodian, nominee, signatory, investment advisor, or intermediary, is not treated as holding the account for purposes of this Agreement, and such other person is treated as holding the account. For purposes of the immediately preceding sentence, the term "Financial Institution" does not include a Financial Institution organized or incorporated in a U.S. Territory. In the case of a Cash Value Insurance Contract or an Annuity Contract, the Account Holder is any person entitled to access the Cash Value or change the beneficiary of the contract. If no person can access the Cash Value or change the beneficiary, the Account Holder is any person named as the owner in the contract and any person with a vested entitlement to payment under the terms of the contract. Upon the maturity of a Cash Value Insurance Contract or an Annuity Contract, each person entitled to receive a payment under the contract is treated as an Account Holder.

#### **ee)**

The term "U.S. Person" means a U.S. citizen or resident individual, a partnership or corporation organized in the United States or under the laws of the United States or any State thereof, a trust if (i) a court within the United States would have authority under applicable law to render orders or judgments concerning substantially all issues regarding administration of the trust, and (ii) one or more U.S. persons have the authority to control all substantial decisions of the trust, or an estate of a decedent that is a citizen or resident of the United States. This subparagraph 1(ee) shall be interpreted in accordance with the U.S. Internal Revenue Code.

#### **ff)**

The term "Specified U.S. Person" means a U.S. Person, other than: (i) a corporation the stock of which is regularly traded on one or more established securities markets; (ii) any corporation that is a member of the same expanded affiliated group, as defined in section 1471(e)(2) of the U.S. Internal Revenue Code, as a corporation described in clause (i); (iii) the United States or any wholly owned agency or instrumentality thereof; (iv) any State of the United States, any U.S. Territory, any political subdivision of any of the foregoing, or any wholly owned agency or instrumentality of any one or more of the foregoing; (v) any organization exempt from taxation under section 501(a) of the U.S. Internal Revenue Code or an individual retirement plan as defined in section 7701(a)(37) of the U.S. Internal Revenue Code; (vi) any bank as defined in section 581 of the U.S. Internal Revenue Code; (vii) any real estate investment trust as defined in section 856 of the U.S. Internal Revenue Code; (viii) any regulated investment company as defined in section 851 of the U.S. Internal Revenue Code or any entity registered with the U.S. Securities and Exchange Commission under the Investment Company Act of 1940 (15 U.S.C. 80a-64); (ix) any common trust fund as defined in section 584(a) of the U.S. Internal Revenue Code; (x) any trust that is exempt from tax under section 664(c) of the U.S. Internal Revenue Code or that is described in section 4947(a)(1) of the U.S. Internal Revenue Code; (xi) a dealer in securities, commodities, or derivative financial instruments (including notional principal contracts, futures, forwards, and options) that is registered as such under the laws of the United States or any State; (xii) a broker as defined in section 6045(c) of the U.S. Internal Revenue Code, or (xiii) any tax-exempt trust under a plan that is described in section 403(b) or section 457(g) of the U.S. Internal Revenue Code.

<sup>6</sup> (article 1 paragraph 1 of the CW IGA between the USA and Curaçao)

## ***Annex 2: Jurisdiction of residence basis for the CRS-data exchange***

**Source:**

*Working Party No. 10 on Exchange of Information and Tax Compliance, 20-22 October 2014 OECD Conference Centre, Paris*

CRS WEB PORTAL GATHERING OF INFORMATION ON TAX IDENTIFICATION NUMBERS AND CRITERIA FOR TAX RESIDENCY FOR THE PURPOSE OF PUBLICATION ON THE CRS WEB PORTAL

In relation to different items it is foreseen that jurisdictions would verify any pre-completed sections and would provide the following content:

- **Legal provisions for Individual to be considered a tax resident:** Under this item, jurisdictions should list the domestic legal provisions that determine whether an Individual is to be considered a tax resident of that jurisdictions. Such legal provisions may be articles of the relevant tax code (with hyperlinks to the provisions themselves, where possible), as well as any further regulations specifying the residency criteria (again with hyperlinks).
- **Further guidance:** This section should provide further guidance for Individuals to determine whether they are a resident for tax purposes in the jurisdiction, including the beginning and the end of the residency status, reflecting administrative practice on the topic, and presented either in narrative form or by means of hyperlinks to the relevant sections of the government or tax administration website or publications.
- **Legal provisions for Entities to be considered a tax resident:** Under this item, jurisdictions should list the domestic legal provisions that determine whether an Entity is to be considered a tax resident of that jurisdictions. Such legal provisions may be articles of the relevant tax code, as well as any further regulations specifying the residency criteria. Ideally, also a list of domestic Entity types that are in principle considered tax residents of the jurisdiction should be included. (All again with hyperlinks.)
- **Entity types that are as a rule not considered to be tax resident:** This item should ideally provide a list of entity types that are considered fiscally transparent by the jurisdiction or are considered to be non-residents for tax purposes by the jurisdiction based on other criteria (such as trusts, foundations, partnerships, etc.). Jurisdictions may wish to complement this section with further guidance on their domestic rules on the topic, either in narrative form or by inserting relevant hyperlinks.
- **Further guidance:** This section should provide further guidance for Entities to determine whether they are a resident for tax purposes in the jurisdiction, including the beginning and the end of the residency status, reflecting administrative practice on the topic, and presented either in narrative form or by means of hyperlinks to the relevant sections of the government or tax administration website or publications.
- **Access to double tax treaties:** In this section, jurisdictions should ideally provide a hyperlink to the relevant government website where tax treaties are published or, in absence of a website, how treaties can be otherwise efficiently accessed.
- **Contact point for further information:** Under this header, jurisdictions would provide the contact details of the competent service within their tax administration, which can be contacted in case of further questions on tax residency.

*Answers of Jurisdiction on items above can lead to a Jurisdiction-specific guidance.*

### *Annex 3: Concepts and definitions*

**AEOI** stands for **Automatic Exchange of Information** and is used among others in the e-mail address of the Directorate Fiscal affairs for questions about international data exchange **Info.Aeoi@gobiernu.cw**.

**Alert** is an e-mail report, which is sent by the receiver of data to the person who supplied or provided data. It draws attention to the fact that the data was received in perfect condition and if there are notifications with regard to the report itself and/or the content of datagroups in the report.

**CCN-network** is the Common Communication Network of the European Union.

**CRIB** is the abbreviation for **Central Registration and Information system Taxation**. Data of the Tax authorities are recorded in SIAH and for Income tax, an independent IB system is being used. Customs also uses its own system.

**CRS** is the abbreviation for **Common Reporting Standard**.

**CTS** is the abbreviation for **Common data Transmission System**. The network that is made available for the data exchange with MCAA-countries.

**CW IGA** is the **InterGovernmental Agreement**, concluded by the Minister of Finance of the United States of America and the Minister of Finance of Curaçao (**CW**) for mutual exchange of FATCA data.

**Data preparation** is the encoding and compressing of data into a report, which can be provided to the USA or an MCAA-country.

**FATCA** is the abbreviation for **Foreign Account Tax Compliance Act**.

**FFI** within the framework of this document is a (part of a) financial institution, which is registered with the IRS as '**foreign financial institution**' and is established in Curaçao. In the data exchange, an FFI is a ReportingFI.

**FI** is a **financial institution in Curaçao**. Within the framework of the international data exchange, an FI can act for the Inspectorate, as a provider of data with only itself as ReportingFI or only a few FFI's of the FI as ReportingFI or itself and a few FFI's of the FI as ReportingFI's or only itself as ReportingFI (not FFI, because there are no accounts of US-persons).

**Data supply by financial institutions to the Inspectorate** is a supply of agreed financial data of a fiscal year for accountholders, who are US-persons and/or have one or more MCAA-country / countries as jurisdiction of residence. It should be possible to send data of accountholders to several countries (to be included in ResCountryCode under Accountholder). A data supply by the financial institution is an XML-report with a FATCA CRS XML-report schedule version 2.0. A data supply contains one or more MessageBody's with always a combination of ReportingFI and ReportingGroup.

**Data provision by the Inspectorate to the USA and MCAA-countries** is a provision of agreed financial data of a fiscal year for a selection of accountholders. As from fiscal year 2016, for the provision to the USA, the US persons and for provision to MCAA-countries, persons with jurisdiction of residence.

For fiscal year 2016, the MCAA-countries that belong to the early adapters and as from fiscal year 2017 supplemented with countries that joined the MCAA.

A data provision by the Inspectorate to a country is an XML-report with an applicable XML report schedule for the relevant country:

- FATCA XML report schedule version 2.0 for the USA,
- CRS XML report schedule version 1.0 for MCAA countries

A data provision contains one or more MessageBody's with always a combination of ReportingFI and ReportingGroup. In the ReportingGroup there is either a NilReport or one or more AccountReport and if for the IRS there is a Sponsor for the relevant ReportingFI there shall be, in addition, Sponsor data in the ReportingGroup.

**HCTA** is the abbreviation for **Host Country Tax Authority**. In case of Curaçao this is the Inspectorate.

**IDES** stands for **International Data Exchange Service**. The network that is made available for the data exchange with the USA (IRS).

**The Inspectorate** is the abbreviated name of **the Tax Inspectorate of Curaçao**.

**Internal Revenue Services** is the Tax authorities of the United States of America and the organization with whom the Inspectorate exchanges FATCA data.

**IRS** is the abbreviation for **Internal Revenue Services**.

**National Ordinance International Assistance upon the levying of Taxes (LIBB)** is a Law that entered into force at the beginning of August 2015. Under this regime, ESRR data exchange becomes a mandatory exchange. The law is the legal basis for international data exchange FATCA CRS and ESRR.

**Learning circle International Data exchange** is the annual evaluation in October of the process, organization and support in order to determine improvements for the next fiscal year. Evaluation does not only occur internally within the Inspectorate, but also together with the financial institutions and BearingPoint as provider and technical manager of PFGU.

**MCAA** is a **Multilateral Competent Authority Agreement on Automatic Exchange of Financial Account Information**. On 29 October 2014, 48 countries signed an MCAA in Berlin to mutually start exchanging CRS-data, as from fiscal year 2016. Curaçao is one of the 48 countries. A second group of countries will be added to the MCAA. As from fiscal year 2017 they will connect to the mutual data exchange. Aruba and St. Maarten belong to this second group of countries.

**MCAA-country** is a country with which Curaçao mutually exchanges CRS data. For fiscal year 2016 it was a group of early adapters and as from fiscal year 2017, the number of countries shall be complete. A country is an MCAA-country if the country signed the MCAA.

**Notifications for FATCA** (as from fiscal year 2014) **and CRS data exchange** (as from fiscal year 2016) contains error messages (notifications) on data provisions on two levels:

- notifications on report level from the USA and MCAA-countries, which are processed by the Inspectorate
- notifications on data level from the USA and MCAA-countries, which are made available by the Inspectorate to the financial institutions and Sponsors who supplied data with errors.



Financial institutions and Sponsors shall receive an e-mail alert if they have supplied data with errors and can consult, in PFGU, the notifications (of all countries) per data per ReportingFI.

**PFGU** is the abbreviation of the web portal Portal Financial Data Exchange.

**Portal Financial Data Exchange** is the web portal that supports financial institutions, the Inspectorate and CLO Tax authorities The Netherlands in the execution of international data exchange within the framework of FATCA CRS ESRR.

**ReportingFI** is, in a report, the organization or organization part for which financial data gets supplied or provided (an FFI in the framework of the FATCA and an FI in the framework of CRS) . The supplied or provided data have been included in corresponding ReportingGroup within the MessageBody.

The MessageBody can appear more often in one report and consists of a combination of one ReportingFI and one ReportingGroup with either a NilReport or one or more AccountReports and if the ReportingFI has a Sponsor at the IRS, data about the Sponsor (both in case of a NilReport as in case of AccountReport(s) in ReportingGroup).

**Sponsor** is a financial institution that registered with the IRS as Sponsor (GIIN ends with SP.531) in order to act as provider of financial data for a few FFI's. The registration with the IRS is required in order to be able to act as Sponsor that supplies data to the Inspectorate.

**UTF-8 encoding standard** is a collection of characters that can appear in xsd:string elements of data supplies. From this collection of characters, eight characters or combinations cannot be used .

It concerns the following English terms:

- apostrophe ('),
- ampersand (&),
- ampersand hash (&#),
- double dash (—),
- greater than (>),
- less than (<),
- slash asterisk (/\*),
- quotation mark (").

#### Annex 4: Possible characters in xsd:string elements = UTF-8 exclusive eight characters

The data provision by the Inspectorate to the IRS has to comply in the xsd:string elements (text fields) to the 'UTF-8 encoding standard' and eight characters cannot be used from this set of characters.

Upon receipt of FATCA reports by the IRS, the reports shall be checked and a notification (error notification) shall come back if there are unauthorized characters in the received report. On the IRS site you can see what is authorized or not (<https://www.irs.gov/Businesses/Corporations/FATCA-XML-Schema-Best-Practices-for-Form-8966>):

*FATCA XML documents should conform to recommended XML schedule best practices. Certain characters are prohibited and if included will cause the file to reject the transmission and generate an error notification.*

##### Non-Optional Entity Reference

*If an XML document contains one of these characters in the XML text content, the data packet will be rejected and an error notification (XML not well-formed) will be generated. These characters are **not allowed** by XML syntax rules and must be replaced with the following predefined entity references. To prevent error notifications, please ensure your XML documents do not include any of these characters.*

Character	Description	Entity Reference
&	Ampersand	&amp;
<	Less Than	&lt;

##### Optional Entity Reference

*If an XML document contains one of these characters in the XML text content, it is not restricted and will not cause an error notification. The characters should be replaced by the following predefined entity references to conform to XML schedule best practices.*

Character	Description	Entity Reference
>	Greater Than	&gt;
'	Apostrophe	&apos;
"	Quotation Mark	&quot;

##### SQL Injection Validation

*If an XML document contains one of these combinations of characters in the XML text content, the data packet will be rejected and a failed threat detection (error) notification will be generated. These combinations of characters are **not allowed**. To prevent error notifications, do not include any of these combinations of characters.*

Character	Description	Entity Reference
--	Double Dash	N/A
/*	Slash Asterisk	N/A
&#	Ampersand Hash	N/A

Page Last Reviewed or Updated: 10-Aug-2015

### **Annex 5: FATCA CRS XML report schedule version 2.0**

The XML-report schedule FATCA CRS as such and visualizations thereof and an example of an XML-report, that complies with the XML-report schedule FATCA CRS, have been added as a separate annex to the Manual International Data exchange FATCA CRS.

**The separate annex with the XML-report schedule FATCA CRS consists of :**

**the XML report schedule FATCA CRS version 2.0**



*FatcaCrs\_v2.0.xsd*

It uses types, which have been specifically defined for that XML-report schedule:



*FatcaCrsTypes\_v2.0.xsd*

And it uses the following externally defined XML-schedule's:



*stffatcatypes\_v2.0.xsd*



*isofatcatypes\_v1.1.xsd*



*oecdtypes\_v4.2.xsd*

**schematic total overview XML-report schedule FATCA CRS**



*total overview v2.0.png*

Legend with total overview XML-report schedule FATCA CRS.docx

**an example** of a report according to the XML-report schedule FATCA CRS is as follows:

*the content of the data is automatically generated and cannot be realistic; it concerns the XML report schedule FATCA CRS*



*Example v2.0.xml*

**Modifications in XML schedule FATCA CRS version 2.0 compared to FATCA CRS ESRR XML schedule version 1.6**

As from fiscal year 2016, the XML report schedule has been modified on a number of points and has become FATCA CRS XML report schedule version 2.0. This XML schedule is intended for the exchange of FATCA and CRS data, as from fiscal year 2016. Version 2.0, for fiscal year 2016, was modified on the following points compared to version 1.6 as applicable for fiscal year 2015:

- At Accountholder Individual, WithholdingTax has been abolished (directly after ResCountryCode)
- At Accountholder Organization, WithholdingTax has been abolished (directly after ResCountryCode)

And because the IRS switched to a new version of the FATCA XML schedule (version 2.0 instead of version 1.1), the FATCA CRS XML-report schedule for FI's and Sponsors in Curacao had to be modified on a number of points (the CRS XML schedule remained version 1.0):

- On several fields, by means of a type, the maximum and minimum length of the string was enforced (Examples are StringMax200, StringMax4000, StringMin1Max200).
- At ReportingFI and Sponsor, FilerCategory was added (an additional field required in order to fill in the FATCA XML report)
- In ReportingGroup, NilReport was added beside AccountReport as EITHER one choice OR the other choice. Sponsor shall be optional for both. In the MessageHeader, MessageTypeIndic has continued existing as a field. With this, there is the least modification for FI's in Curaçao:
  - For ReportingFI's for which a BLANK DATA supply was made, the FI or Sponsor shall fill in the following parts of the report:
    - MessageHeader with, among others MessageTypeIndic = CRS703
    - ReportingGroup with NilReport
    - and Sponsor if we can speak of a Sponsor for the relevant ReportingFI
  - For ReportingFI's for which DATA is supplied, the FI shall fill in the following parts of the report:
    - MessageHeader with, among others MessageTypeIndic = CRS701 (new) or CRS702 (correction)
    - ReportingGroup with one or more AccountReport(s)
    - and Sponsor if we can speak of a Sponsor for the relevant ReportingFI
- For SubstantialOwner, the FATCA XML report version 2.0 recognizes both individual as organization. In FATCA XML version 1.1 there was only individual. FATCA CRS version 2.0 makes it possible to supply SubstantialOwner of the type of organization.
- In AccountReport, AdditionalData has been included to connect with FATCA XML schedule version 2.0.

Furthermore, there are a number of modifications in the FATCA XML schedule which will have no consequences for the FATCA CRS schedule version 2.0 in Curaçao.

**Annex 6: error notifications (notifications) on data level from the USA and MCAA-countries**

<b>Notificaties voor ReportingGroups</b> - 800701 tot en met 800747 voor 1e levering van gegevens voor een ReportingGroup (levering van nieuwe gegevens) - overeenkomstige serie 800901 tot en met 800947 voor 2e en volgende levering van gegevens voor een ReportingGroup (correctieleveringen)	
notificatie code	omschrijving
800701	AccountNumber moet aanwezig zijn. Als er geen AccountNumber is, dan dient 'NANUM' geleverd te worden.
800702	Als AccountNumberType = OECD601 (IBAN account), dan moet AccountNumber voldoen aan het IBAN formaat, dat maximaal 34 posities lang is en varieert per land maar voldoet altijd aan: - landcode volgens ISO 3166-1 alpha-2 - twee cijfers als controle getal - een rekeningidentificatie bestaande uit maximaal 30 cijfers en letters
800703	Als AccountNumberType = OECD603 (ISIN account), dan moet AccountNumber voldoen aan het ISIN formaat (12 posities): - landcode volgens ISO 3166-1 alpha-2 - negen cijfers als identificatie van het account - een cijfer als controlegetal
800704	Account Balance niet $\geq 0.00$ (PFGU zorgt voor de juiste verstrekking naar USA en MCAA-landen)
800705	ResCountryCode voor ReportingFI is verplicht en moet overeen komen met de Sending Country Code
800706	Naam is niet geleverd voor ReportingFI
800707	Naam is niet geleverd voor AccountHolder of Recipient
800708	NameType mag niet OECD201 zijn (dit geldt voor ReportingFI, Sponsor, AccountHolder Individual, AccountHolder Organisation, SubstantialOwner Individual, SubstantialOwner Organisation en Controlling Person)
800709	FirstName bij AccountHolder Individual is verplicht (als AccountHolder Individual geen voornaam heeft, dan 'NFN' invullen)
800710	AccountHolder Individual LastName is niet geleverd
800711	FirstName bij SubstantialOwner Individual is verplicht (als SubstantialOwner Individual geen voornaam heeft dan 'NFN' invullen)
800712	Naam is niet geleverd voor SubstantialOwner Individual
800713	Naam is niet geleverd voor SubstantialOwner Organisation
800714	FirstName bij Controlling Person is verplicht (als Controlling Person geen voornaam heeft dan 'NFN' invullen)
800715	Controlling Person LastName is niet geleverd
800716	City of Town is niet geleverd voor ReportingFI
800717	City of Town is niet geleverd voor AccountHolder of Recipient
800718	City of Town is niet geleverd voor Asset owner
800719	Als bij het adres voor een AccountHolder Organisation is gekozen voor AddressFix, dan moet City gevuld zijn
800720	City of Town is niet geleverd voor Sponsor of SubstantialOwner Organisation
800721	City of Town is niet geleverd voor Controlling Person
800722	Als bij adres ReportingFI is gekozen voor AddressFree, dan moet AddressFree daad- werkelijk gevuld zijn
800723	Als bij het adres voor een AccountHolder Individual is gekozen voor AddressFree, dan moet AddressFree daadwerkelijk gevuld
800724	Als bij adres AccountHolder Organisation is gekozen voor AddressFree, moet AddressFree daadwerkelijk gevuld zijn
800725	Als bij adres SubstantialOwner Individual is gekozen voor AddressFree, moet AddressFree daadwerkelijk gevuld zijn
800726	Als bij adres SubstantialOwner Organisation is gekozen voor AddressFree, moet AddressFree daadwerkelijk gevuld zijn
800727	Als bij een adres voor een Controlling Person is gekozen voor AddressFree, dan moet AddressFree daadwerkelijk gevuld zijn
800728	geboortedatum mag niet voor 1900 vallen en niet het huidige jaar zijn
800729	Geboortedatum is niet geleverd voor AccountHolder Individual
800730	Geboortedatum is niet geleverd voor SubstantialOwner Individual
800731	Geboortedatum is niet valide voor AccountHolder Individual (blijkt uit persoonsregistratie USA of MCAA-land)
800732	Geboortedatum is niet valide voor SubstantialOwner Individual (blijkt uit persoonsregistratie USA)
800733	GIIN komt niet overeen met registratie bij de IRS (geldt bij ReportingFI ingeval van een FFI en bij Sponsor)
800734	GIIN formaat is niet valide voor een Sponsor (SP moet voorkomen in GIIN)
800735	GIIN van de ReportingFI (als zijnde een FFI) is niet geleverd
800736	GIIN voor Sponsor komt niet voor in de IRS-registratie
800737	Naam/geboortedatum match klopt niet voor AccountHolder Individual (blijkt uit de persoonsregistratie USA of MCAA-land)
800738	TIN ReportingFI is niet geleverd
800739	TIN AccountHolder Individual of TIN AccountHolder organisation is niet geleverd
800740	TIN AccountHolder Individual of TIN AccountHolder organisation is niet valide - voor US-persons moet het TIN-formaat voldoen aan 999999999 of 99-9999999 of 999-99-9999 - voor MCAA-landen is nog geen controle op formaat opgenomen in de PFGU
800741	TIN Substantial Owner niet valide (voor US-persons is TIN-formaat gelijk aan 999999999 of 99-9999999 of 999-99-9999)
800742	Voor Controlling Person is de TIN (voorzien van TIN@IssuedBy) niet geleverd
800743 niet in gebruik	TIN structuur is niet valide (CRS voorziet deze controle in de toekomst voor TIN's van diverse MCAA-landen)
800744 niet in gebruik	TIN is niet valide tegen het TIN-algoritme (CRS voorziet deze notificatie in de toekomst voor TIN's van diverse MCAA-landen)
800745 niet in gebruik	TIN heeft geen valide semantiek (CRS voorziet deze notificatie in de toekomst voor TIN's van diverse MCAA-landen)
800746	ControllingPersonType niet leveren bij AccountHolder Organisation met AccountHolderTypeCRS = CRS102 of CRS103
800747	ControllingPersonType is verplicht, ingeval van AccountHolder Organisation met AccountHolderTypeCRS = CRS101
99999 niet in gebruik	custom error (ontvangen bericht bevat een fout waarvoor geen specifieke error code bestaat; in details is de fout beschreven)

Notifications for ReportingGroups -800701 to 800747 for 1 <sup>st</sup> data supply for a ReportingGroup (supply of new data) -equivalent series 800901 to 800947 for 2 <sup>nd</sup> and next data supply for a ReportingGroup (correction supplies)	
notification code	description
800701	AccountNumber has to be there. If there is no AccountNumber then NANUM should be supplied
800702	If AccountNumber Type = OECD601 (IBAN account), then AccountNumber has to comply with IBAN format, which has a maximum length of 34 positions and varies per country but should always comply with: -country code according to ISO3166-1 alpha-2 -two numbers as verification number -an account identification consisting of a maximum of 30 numbers and letters
800703	If AccountNumber Type = OECD603 (ISIN account), then AccountNumber has to comply with ISIN format (12 positions): -country code according to ISO3166-1 alpha-2 -nine numbers as identification of the account -a number as verification number
800704	Account Balance not > 0.00 (PFGU takes care of the correct provision to the USA and MCAA-countries)
800705	ResCountryCode for ReportingFI shall be mandatory and should correspond to the Sending Country Code
800706	Name has not been supplied for ReportingFI
800707	Name has not been supplied for Accountholder or Recipient
800708	NameType may not be OECD201 (this applies to ReportingFI, Sponsor, Accountholder Individual, Accountholder Organization, Substantial Owner Individual, Substantial Owner Organization and Controlling Person)
800709	FirstName at Accountholder Individual shall be mandatory (if Accountholder Individual does not have a first name, fill in 'NFN')
800710	Accountholder Individual LastName has not been supplied
800711	FirstName at Substantial Owner Individual shall be mandatory (if Substantial Owner Individual does not have a first name, fill in 'NFN')
800712	Name has not been supplied for Substantial Owner Individual
800713	Name has not been supplied for Substantial Owner Organization
800714	FirstName at Controlling Person shall be mandatory (if Controlling Person does not have a first name, fill in 'NFN')
800715	Controlling Person LastName has not been supplied
800716	City or Town has not been supplied for ReportingFI
800717	City or Town has not been supplied for Accountholder or Recipient
800718	City or Town has not been supplied for Asset owner
800719	If at the address for an Accountholder Organization, the choice was made for AddressFix then City has to be filled in.
800720	City or Town has not been supplied for Sponsor or SubstantialOwner Organization
800721	City or Town has not been supplied for Controlling Person
800722	If at address ReportingFI, the choice was made for AddressFree then AddressFree should be really filled in.
800723	If at the address for Accountholder Individual, the choice was made for AddressFree then AddressFree should be really filled in.
800724	If at the address for Accountholder Organization, the choice was made for AddressFree then AddressFree should be really filled in.
800725	If at the address for Substantial Owner Individual , the choice was made for AddressFree then AddressFree should be really filled in.
800726	If at the address for Substantial Owner Organization, the choice was made for AddressFree then AddressFree should be really filled in.
800727	If at the address for Controlling Person, the choice was made for AddressFree then AddressFree should be really filled in.
800728	Birth date may not fall before 1900 and cannot be the current year
800729	Birth date has not been supplied for Accountholder Individual
800730	Birth date has not been supplied for Substantial Owner Individual
800731	Birth date is not valid for Accountholder Individual (appears from person registration USA or MCAA-country)
800732	Birth date is not valid for Substantial Owner Individual (appears from person registration USA)
800733	GIIN does not correspond to registration with the IRS (applies to ReportingFI in case of an FFI and to Sponsor)
800734	GIIN format is not valid for a Sponsor (SP has to appear in GIIN)
800735	GIIN of the ReportingFI (being an FFI) has not been supplied
800736	GIIN for Sponsor does not appear in the IRS registration
800737	Name/birth date match is not correct for Accountholder Individual (appears from person registration USA or MCAA-country)
800738	TIN ReportingFI has not been supplied
800739	TIN Accountholder Individual or TIN Accountholder Organization has not been supplied

800740	TIN Accountholder Individual or TIN Accountholder Organization is not valid -for US-persons, TIN format has to comply with 999999999 or 99-9999999 or 999-99-9999 -for MCAA-countries no monitoring on format has been included in the PFGU
800741	TIN Substantial Owner is not valid (for US-persons, TIN format is equal to 999999999 or 99-9999999 or 999-99-9999)
800742	TIN (with TIN@IssuedBy) has not been supplied for Controlling Person.
800743 not used	TIN structure is not valid (CRS provides this control in the future for TIN's from several MCAA countries)
800744 not used	TIN is not valid against the TIN-algorithm (CRS provides this notification in the future for TIN's from several MCAA countries)
800745 not used	TIN does not have a valid semantics (CRS provides this notification in the future for TIN's from several MCAA countries)
800746	Do not supply ControllingPersonType at Accountholder Organization with AccountHolderTypeCRS = CRS102 or CRS103
800747	ControllingPersonType shall be mandatory in case of Accountholder Organization with AccountHolderTypeCRS = CRS101
99999 not used	Customer error (received report contains an error for which there is no specific error code; error described in details)

**Annex 7: Controls and error notifications data supply to the Inspectorate**

<b>Validation nr</b>	<b>Validation Description</b>	<b>Element</b>	<b>Text of the error notification (English)</b>
X1	FATCA CRS XML-schedule XSD	-	From XSD
A1	Jurisdictions of Residence appear in the PFGU as countries with which data are exchanged for a certain fiscal year	-	This country is not known, for this fiscal year, as country for the international data exchange.
A2	All ReportingFI's are registered as EOI-relations of the supplying institution (SendingCompanyIN)	ReportingFI - TIN	The ReportingFI(s) with the TIN(s) (TINs separated with commas) are not registered as related institutions of the supplying institution.
A3	Control that guarantees that no double/similar GIIN's of ReportingFI's appear in 1 supply.	-	This file contains several reports of the same ReportingFI. Each ReportingFI can only appear once in the supply.
1	Validation version number in relation to applicable version number of receipt	Version	Version in the uploaded file is not equal to current version. The current version is <version>.
3	Validation on existing CRIB-code	MessageHeader - SendingCompanyIN	SendingCompanyIN does not contain an existing CRIB-number or in case of a Sponsor as supplying FI, no number that the Sponsor obtained upon registration in PFGU.
4	Corresponds to the CRIB-number for which the user is authorized to supply data	MessageHeader - SendingCompanyIN	You are not authorized to provide data on behalf of the institution mentioned in SendingCompanyIN.
5	Validation for the presence of 'CW'	MessageHeader - TransmittingCountry	Transmitting country has to be 'CW'
6	Validation for the presence of 'CW'	MessageHeader - ReceivingCountry	Receiving country has to be 'CW'
7	MessageRefId is a mandatory field	MessageHeader - MessageRefId	MessageRefId shall be mandatory and has to start with 'CW' followed by the fiscal year and the CRIB-number of the supplying FI or - in case of a Sponsor as supplying FI - the number that the Sponsor obtained upon registration in PFGU.
8	The first six characters have to be equal to 'CW' followed by the fiscal year (JJJJ) for which the data in the report apply. So, for fiscal year 2014 it is 'CW2014'. Subsequently, the CRIB-code of the financial institution has to be included followed by the identification of the report as such.	MessageHeader - MessageRefId	MessageRefId has to start with 'CW' followed by the fiscal year and the CRIB-number of the supplying FI or - in case of a Sponsor as supplying FI - the number that the Sponsor obtained upon registration in PFGU.



9	Cannot contain spaces	MessageHeader - MessageRefId	
10	Has not yet been used in a file that was already uploaded, unless this file was withdrawn or rejected.	MessageHeader - MessageRefId	The MessageRefId <MessageRefId> has already been used in a previous upload. If the structure is correct, you have to use a (different) serial number.
11	Mandatory in case of MessageTypeIndic = CRS702.	MessageHeader - CorrMessageRefId	CorrMessageRefId shall be mandatory for a correction report (code CRS702)
12	Mandatory in case of MessageTypeIndic = CRS703 if the file contains ReportingFI's for which data has already been submitted in the relevant fiscal year	MessageHeader - CorrMessageRefId	CorrMessageRefId shall be mandatory for a blank data supply (code CRS703) if it contains ReportingFIs for which data have already been submitted.
13	ReportingFI, account report nor possible sponsor parts of a reporting FI that appear in a CRS703 report with a CorrMessageRefId, cannot be corrected with one (or several) CRS702 reports.	ReportingFI – TIN	Data for ReportingFI (TIN, Name) have been previously corrected and can no longer be deleted by means of CRS703 reports. You should do the deletion with CRS702 report(s).
14	The first six characters have to be equal to 'CW' followed by the fiscal year (JJJJ) for which the data in the report apply. So, for fiscal year 2014 it is 'CW2014'. Subsequently, the CRIB-code of the financial institution has to be included followed by the identification of the report as such.	MessageHeader - CorrMessageRefId	CorrMessageRefId has to start with 'CW' followed by the fiscal year and the CRIB-number of the supplying FI or - in case of a Sponsor as supplying FI - the number that the Sponsor obtained upon registration in PFGU.
15	CorrMessageRefId contains de MessageRefId of a file that was not previously uploaded, rejected or withdrawn.	MessageHeader - CorrMessageRefId	No previous report with the MessageRefId was mentioned in CorrMessageRefId
16	Cannot contain spaces	MessageHeader - CorrMessageRefId	
17	Elements cannot contain prohibited combinations (see Manual International data exchange FATCA CRS Annex 4 (-, /*, &#))	All text and attribute elements	Text elements in the entire file cannot contain the following combinations: --, /* and &#.
19	In the MessageBody of a FATCA CRS ESRR report, there is always one ReportingFI and one ReportingGroup.  - for blank data supply ReportingGroup contains one NilReport and possible Sponsor data - for supply of data ReportingGroup contains one or more Accountreports and possible Sponsor data	MessageBody	Each MessageBody has to contain exactly one ReportingFI and one ReportingGroup.  The ReportingGroup has to contain either a NilReport or one or more AccountReports and can in addition contain, in both cases, possible Sponsor data.
22	Mandatorily filled in with 'CW'	ReportingFI – ResCountryCode	ResCountryCode of ReportingFI has to be 'CW'.
23	For ReportingFI and SubstantialOwner Individual, SubstantialOwner Organization and ControllingPerson (if	TIN	TIN shall be mandatory for ReportingFI, SubstantialOwner Individual and SubstantialOwner Organization.

	<i>available in FI-administration) the TIN shall be mandatory</i>		
24	<i>TIN IssuedBy, shall be mandatory if TIN is filled in.</i>	<i>TIN - IssuedBy</i>	<i>You should indicate who issued the relevant TIN.</i>
25	<i>Validation on correct GIIN</i>	<i>ReportingFI – TIN</i>	<i>TIN of ReportingFI has to be a valid GIIN. If the reported FI is not registered with FATCA, then a valid CRIB-number has to be used.</i>
26	<i>Name of the ReportingFI shall be mandatory</i>	<i>ReportingFI - Name</i>	<i>Name of ReportingFI has to be filled in.</i>
27	<i>Mandatorily filled in with 'CW'</i>	<i>ReportingFI – Address – CountryCode</i>	<i>Country code in the address of ReportingFI has to be filled in with 'CW'.</i>
28	<i>Mandatory if AddressFix is available</i>	<i>Address - AddressFix – City</i>	<i>AddressFix – City shall be mandatory and should be given if AddressFix will be used.</i>
29	<i>DocRefId shall be mandatory</i>	<i>DocRefId</i>	<i>DocRefId should be given with all elements.</i>
30	<i>The first six characters have to be equal to 'CW' followed by the fiscal year (JJJJ) for which the data in the report apply. So, for fiscal year 2014 it is 'CW2014'. Subsequently, the CRIB-code of the financial institution has to be included followed by the identification of the report as such. Instead of the CRIB number, sponsors use the number that they received upon registration with the PFGU.</i>	<i>DocRefId</i>	<i>The DocRefID of (ReportingFI / AccountReport / PoolReport / Intermediary / Sponsor) has to start with 'CW', followed by the fiscal year and the CRIB-number.</i>  <b>As from fiscal year 2015:</b> <i>The DocRefID of (ReportingFI / AccountRapport / Sponsor) has to start with 'CW', followed by the fiscal year and the CRIB-number.</i>
31	<i>Has not yet been used at another place in this file or in a file that was already uploaded, unless this file was withdrawn or rejected.</i>	<i>DocRefId</i>	<i>The DocRefID has been used more than once in this file or has been previously used. DocRefID has to be unique.</i>
33	<i>The first six characters have to be equal to 'CW' followed by the fiscal year (JJJJ) for which the data in the report apply. So, for fiscal year 2014 it is 'CW2014'. Subsequently, the CRIB-code of the financial institution has to be included followed by the identification of the report as such. Instead of the CRIB number, sponsors use the number that they received upon registration with the PFGU.</i>	<i>CorrDocRefId</i>	<i>DocRefID of ReportingFI, AccountRapport and Sponsor has to start with 'CW', followed by the fiscal year and the CRIB-number.</i>
34	<i>In CorrDocRefId, the DocRefId of a datagroup from the file to be corrected, has been included (this means the file with the MessageRefId to which reference is made in CorrMessageRefId in the MessageHeader of the correction report).</i>	<i>CorrDocRefId</i>	<i>The CorrDocRefID does not exist in the file that you are correcting.</i>

	Validation controls if the DocRefId does appear in the file to be corrected.		
35	Upon revising a supply, the CorrectionRefId of the new file should be equal to the MessageRefId of the original file	CorrMessageRefId	The CorrMessageRefId is not the same as the MessageRefId of the original case.
36	The data group that has the DocRefId that is mentioned in CorrDocRefId, is of the same type as this data group (meaning for example, they are both ReportingFIs or both Sponsors).	CorrDocRefId	CorrDocRefId is an invalid reference. Correcting element is a ReportingFI, AccountReport or Sponsor, but the original element is a ReportingFI, AccountReport or Sponsor.
37	Cannot contain spaces	CorrDocRefId	CorrDocRefId should be given with all elements.
38	Mandatorily filled in with an ISO-3166-1 country code if Sponsor is used.	Sponsor - ResCountryCode	ResCountryCode of Sponsor has to be an ISO-3166-1 country code.
40	Validation on Sponsor's TIN and SendingCompanyIN	Sponsor – TIN in combination with Messageheader - SendingCompanyIN	TIN van Sponsor has to be equal to the GIIN that the Sponsor received from the IRS.
41	SendingCompanyIN shall be mandatory and is equal to CRIB number of PFGU user (for a supplying FI) or equal to the number that the Sponsor received upon registration in PFGU (for a Sponsor)	MessageHeader - SendingCompanyIN	The number in SendingCompanyIN and the GINN number in Sponsor - TIN do not belong to a Sponsor
45	AccountNumber shall be mandatory (if the number is not there, then the NANUM has to be filled in)	AccountNumber	In accordance with manual, the real account number or (in prescribed cases) NANUM should be given.
48	ResCountryCode shall be mandatory if AccountHolder Individual available	AccountHolder - Individual - ResCountryCode	ResCountryCode shall be mandatory if Individual available.
49	Firstname shall be mandatory if AccountHolder Individual available	AccountHolder - Individual - Name – Firstname	Firstname shall be mandatory if Individual available.
50	Lastname shall be mandatory if AccountHolder Individual available	AccountHolder - Individual - Name – Lastname	Lastname shall be mandatory if Individual available.
55	Mandatorily filled in with an ISO-3166-1 country code if AccountHolder Individual will be used.	AccountHolder - Individual - Address – CountryCode	Country code of AccountHolder owners address has to be an ISO-3166-1 country code.
59	AcctHolderTypeFATCA has to be filled in if AccountHolder Organization is a US-person. If the AccountHolder Organization is not a US-person, then this element shall not be supplied.	AccountHolder – Organization - AcctHolderTypeFATCA	AcctHolderTypeFATCA has to be filled in if AccountHolder is a US-person and an organization. If the AccountHolder Organization is not a US-person, then this element cannot appear.
60	As from fiscal year 2016, AcctHolderTypeCRS should be filled in if the AccountHolder is an organization and has another country / other countries,	AccountHolder – Organization - AcctHolderTypeCRS	AccountHolder – AcctHolderTypeCRS  As from fiscal year 2016, AcctHolderTypeCRS should be filled in if the

	<i>other than the US, as jurisdiction of residence. If for fiscal year 2014 or 2015 there is an EU-resident as AccountHolder, then this element shall not be supplied.</i>		<i>AccountHolder has another country / other countries as jurisdiction of residence.  If for fiscal year 2014 or 2015 there is an EU-resident as AccountHolder, then this element cannot appear.</i>
61	<i>SubstantialOwner(s) have to be provided for FATCA-supply, if we can speak of :- specified US owner(s) or- a 'documented FI' or- substantial US owner(s) or controlling US-person(s) of a passive NFFE. SubstantialOwners shall be mandatory if AcctHolderTypeFATCA in AccountReport = FATCA101 or FATCA102.No supply of this datagroup in case of a non-participating FFI or a specified US person.</i>	<i>AccountReport - SubstantialOwner</i>	<i>SubstantialOwners shall be mandatory if AcctHolderTypeFATCA in AccountReport = FATCA101 or FATCA102. No supply of this datagroup in case of a non-participating FFI or a specified US person.</i>
62	<i>SubstantialOwners shall not be applicable for supplies within the framework of the CRS</i>	<i>AccountReport - SubstantialOwner</i>	<i>SubstantialOwner shall not be allowed in an AccountReport if the AccountHolder is not a US-person</i>
63	<i>ResCountryCode for SubstantialOwner Individual has to be filled in with US.</i>	<i>SubstantialOwner - Individual - ResCountryCode</i>	<i>ResCountryCode SubstantialOwner Individual has to be US.</i>
64	<i>Mandatorily filled in with an ISO-3166-1 country code if Individual is used.</i>	<i>SubstantialOwner - Individual - Address – CountryCode</i>	<i>Country code of Substantial Owner Address has to be an ISO-3166-1 country code.</i>
65	<i>Controlling Persons shall be mandatory if AcctHolderTypeCRS in AccountReport is equal to CRS101</i>	<i>AccountReport - ControllingPerson</i>	<i>Controlling Persons shall be mandatory if AcctHolderTypeCRS in AccountReport = CRS101.</i>
66	<i>ControllingPerson only has ResCountryCodes that also appear in the AccountHolder.</i>	<i>AccountReport - ControllingPerson</i>	<i>ResCountryCode of ControllingPerson can only contain countries that also appear in the ResCountryCode of AccountHolder.</i>
67	<i>Mandatorily filled in with an ISO-3166-1 country code if Individual is used.</i>	<i>ControllingPerson - Individual - Address – CountryCode</i>	<i>Country code of ControllingPerson address has to be an ISO-3166-1 country code.</i>
70	<i>In a new supply type CRS701, no other OECD types than OECD1 may be used.</i>	<i>MessageHeader - MessageTypeIndic</i>	<i>A file with MessageTypeIndic=CRS701 can only contain new data.</i>
71	<i>The choice "Type supply" has to correspond to MessageTypeIndic in the uploaded file.</i>	<i>MessageHeader - MessageTypeIndic</i>	<i>MessageTypeIndic is different from what you have reported.</i>
72	<i>The chosen year has to correspond to the reporting period as reported in the uploaded file.</i>	<i>MessageHeader - ReportingPeriod</i>	<i>The reporting period in the file is different from the reporting period indicated by you.</i>
74	<i>Corrections on elements should always occur on the last corrected element in a certain series of corrections.</i>	<i>CorrDocRefId</i>	<i>A correction on a certain element can only be executed on the last corrected element</i>

76	<i>TIN has to be supplied for each ResCountryCode at AccountHolder Individual (if the TIN for a certain ResCountryCode is missing, then you should not supply TIN (and corresponding TIN@IssuedBy))</i>	<i>AccountHolder - Organization - TIN</i>	<i>AccountHolder - Organization - TIN is a mandatory field and has to be reported.</i>
77	<i>Mandatory if TIN shall be supplied</i>	<i>AccountHolder - Organization - TIN – IssuedBy</i>	<i>AccountHolder - Organization - TIN – IssuedBy is a mandatory field and has to be reported.</i>
78	<i>Name of AccountHolder Organization shall be mandatory</i>	<i>AccountHolder-Organization-Name</i>	<i>AccountHolder-Organization-Name is a mandatory field and should be reported.</i>
79	<i>If AddressFix is chosen, then AddressFix-City shall be mandatory</i>	<i>AccountHolder-Organization-AddressFix-City</i>	<i>AccountHolder-Organization-AddressFix-City is a mandatory field and should be reported.</i>
80	<i>The CountryCode for an AccountHolder Organization shall be mandatory</i>	<i>AccountHolder-Organization-CountryCode</i>	<i>AccountHolder-Organization-Country Code is a mandatory field and should be reported.</i>
81	<i>For SubstantialOwner Organization, ResCountryCode should be filled in with US.</i>	<i>SubstantialOwner-Organization-ResCountryCode</i>	<i>The ResCountryCode of a Substantial Owner Organization should be US.</i>
82	<i>Lastname of SubstantialOwner-Individual shall be mandatory</i>	<i>SubstantialOwner-Individual-Lastname</i>	<i>SubstantialOwner-Lastname is a mandatory field and should be reported</i>
83	<i>Firstname of SubstantialOwner-Individual shall be mandatory (if firstname is not known, then 'NFN' should be supplied)</i>	<i>SubstantialOwner-Individual-Firstname</i>	<i>SubstantialOwner-Firstname is a mandatory field and should be reported (in case Firstname is not known, then 'NFN' should be supplied).</i>
84	<i>If AddressFix is chosen, then AddressFix-City shall be mandatory</i>	<i>SubstantialOwner-Individual - AddressFix-City</i>	<i>SubstantialOwner-Individual-AddressFix-City is a mandatory field and should be reported</i>
85	<i>Firstname of ControllingPerson-Individual shall be mandatory (if firstname is not known, then NFN should be supplied)</i>	<i>ControllingPerson-Individual-Firstname</i>	<i>ControllingPerson-Individual-Firstname is a mandatory field and should be reported (in case Firstname is not known, then 'NFN' should be supplied).</i>
86	<i>Lastname of ControllingPerson-Individual shall be mandatory</i>	<i>ControllingPerson-Individual-Lastname</i>	<i>ControllingPerson-Individual-Lastname is a mandatory field and should be reported.</i>
87	<i>If AddressFix is chosen, then AddressFix-City shall be mandatory</i>	<i>ControllingPerson-AddressFix-City</i>	<i>ControllingPerson-AddressFix-City is a mandatory field and should be reported</i>
88	<i>PaymentType shall be mandatory if Payments are supplied</i>	<i>AccountReport-Payment-PaymentType</i>	<i>If Payments are supplied, then the PaymentType should also be supplied.</i>
89	<i>ResCountryCode shall be mandatory at Controlling Person.</i>	<i>ControllingPerson - ResCountryCode</i>	
90	<i>Name of the Sponsor shall be mandatory</i>	<i>Sponsor - Name</i>	<i>Sponsor-Name is a mandatory field and should be reported</i>
93	<i>For the ReportingFI(s) in the supply, for the fiscal year, no Deregistration of the supply ("NO-supply") has been registered.</i>	<i>ReportingFI</i>	<i>The ReportingFI (TIN) has deregistered for the supply for (Fiscal year). In case you still have data to be supplied for this</i>

			<i>institution, then you should first cancel your deregistration.</i>
94	<i>If the account holder is only a US-person (so, does not also have an MCAA-country as jurisdiction of residence), then the account balance should be at least USD 50.000.  This is only checked if the account balance is reported in USD.</i>	Account balance	<i>Accounts with an account balance of no more than USD 50.000 should not be reported if the account holder is only a US-person.</i>
95	<i>Only production DocTypeIndic's (OECD1, OECD2, OECD3) may be used when the system for the relevant year has been released for supply (NTP error if wrong)</i>	All DocRef - DocTypeIndic	<i>Test data (DocTypeIndic = OECD11, OECD12, OECD13) in a production supply shall not be allowed.</i>
96	<i>Only test DocTypeIndic's OECD1, OECD2, OECD3) may be used when the system for the relevant year has been released for contact management (NTP error if wrong)</i>	All DocRef - DocTypeIndic	<i>Production data (DocTypeIndic = OECD1, OECD2, OECD3) in a test supply shall not be allowed.</i>
97	<i>For Sponsor, FilerCategory shall be mandatory (FATCA607, FATCA608 of FATCA609).</i>	Sponsor - FilerCategory	<i>If Sponsor is supplied, then FilerCategory shall be mandatory. Possible values are FATCA607, FATCA608 and FATCA609.</i>
98	<i>Permitted values for FilerCategory for ReportingFI are in accordance with IGA Model 1: FATCA601, FATCA602, FATCA603 and FATCA605, FATCA606 and FATCA610</i>	ReportingFI - FilerCategory	<i>When ReportingFI-FilerCategory are supplied, only the values FATCA601, FATCA602, FATCA603, FATCA605, FATCA606 and FATCA610 may be used.</i>
99	<i>For ReportingFI's that are supplied by a Sponsor, the FilerCategory at the Sponsor should be filled in and at ReportingFI, the FilerCategory may not be provided.</i>	Combination of FilerCategory at Sponsor and FilerCategory at ReportingFI	<i>If data for an FFI is provided by a Sponsor, then FilerCategory at ReportingFI may not be supplied.</i>
98	<del><i>Voor een ReportingFI met een Sponsor dient FilerCategory only bij Sponsor te worden geleverd en mag FilerCategory bij ReportingFI niet worden geleverd</i></del>	<del><i>ReportingFI - FilerCategory Sponsor - FilerCategory</i></del>	<del><i>Als een Sponsor levert voor een FFI, dan moet bij Sponsor FilerCategory gevuld zijn en moet bij ReportingFI None FilerCategory worden geleverd.</i></del>
100	<i>If AccountNumber@AccountNumberType = OECD601 (account number is an IBAN-number), then AccountNumber has to comply with the IBAN-Format.</i>	AccountNumber  if AccountNumberType = OECD601.	<i>If AccountNumber@AccountNumberType = OECD601, then the structure of the AccountNumber has to comply with the structure for an IBAN-number. This number may have a maximum length of 34 positions and varies according to country, but should comply with: (country code according to the ISO 3166-1 alpha-2, two numbers as verification number, an account identification consisting of a maximum of 30 numbers and letters)</i>
101	<i>If AccountNumber@AccountNumberType = OECD603 (account number is an ISIN-number), then AccountNumber has to comply with the ISIN-Format.</i>	AccountNumber  if AccountNumberType = OECD603.	<i>If AccountNumber@AccountNumberType = OECD603, then the structure of the AccountNumber has to comply with the structure for an ISIN-number, which has a length of twelve positions and complies with: - country code according to the ISO 3166-1 alpha-2 - nine numbers as identification of account - a number as verification number</i>
102	<i>Account balance &lt; 0</i>	Account balance	<i>The supplied Account balance has to be greater or equal to 0.</i>
103	<i>If AddressFix is chosen, then AddressFix-City shall be mandatory</i>	SubstantialOwner-Organization - AddressFix-City	<i>SubstantialOwner-Organization-AddressFix-City is a mandatory field and should be reported</i>

104	If at an Address, the choice was made for AddressFree, then it should be really filled in (this applies to ReportingFI, Sponsor, AccountHolder Individual, AccountHolder Organization, SubstantialOwner Individual, SubstantialOwner Organization and ControllingPerson Individual)	If AddressFree is the only Address field is, then it has to be filled in.	If AddressFree is used to indicate the Address, then it should really contain text.
105	For AccountHolder Individual, AccountHolder Organization and SubstantialOwner Individual and SubstantialOwner Organization, the TIN in case of TIN@IssuedBy = 'US', has to comply with the TIN-Format of the USA.	TIN at AccountHolder Individual, AccountHolder Organization, SubstantialOwner Individual and SubstantialOwner Organization	Format of TIN in case of TIN@IssuedBy = 'US' has to be equal to 999999999 or 99-9999999 or 999-99-9999.
106	ControllingPersonType should not be filled in if AcctholderTypeCRS for AccountHolder Organization is equal to CRS102 or CRS103	ControllingPersonType	If AcctholderTypeCRS = CRS102 or CRS103 for an AccountHolder Organization, then ControllingPersonType should not be provided.
107	ControllingPersonType is mandatory if AcctholderTypeCRS = CRS101 for AccountHolder Organization.	ControllingPersonType	If AcctholderTypeCRS = CRS101 for an AccountHolder Organization, then ControllingPersonType shall be mandatory.
108	In DocRef of ReportingFI, Sponsor, NilReport and AccountReport, CorrDocRefId may not appear if MessageTypeIndic = CRS701.	MessageTypeIndic in combination with availability of CorrDocRefId in DocRef's	If a supply of new data is made, then the field CorrDocRefId may not appear in the DocSpec.
109	In DocRef of ReportingFI, Sponsor, NilReport and AccountReport, CorrDocRefId has to appear if MessageTypeIndic = CRS702.	MessageTypeIndic in combination with availability of CorrDocRefId in DocRef's	If a correction supply of data is made, then the field CorrDocRefId must be supplied in the DocSpec.
110	If MessageTypeIndic = CRS701, then CorrMessageRefId may not be supplied in the MessageHeader.	MessageTypeIndic in combination with availability of CorrMessageRefId	If a supply of new data is made, then CorrMessageRefId may not appear in the MessageHeader.
111	If by means of a correction supply, ReportingFI is deleted (DocTypeIndic = OECD3 (or OECD13 for test supply) in the DocRef of the ReportingFI, then a ReportingGroup has to be supplied in order to also remove, the previously supplied NilReport or the previously supplied AccountReports, with or without Sponsor data (to be included in the correction supply with DocTypeIndic = OECD3 or OECD13).	If DocTypeIndic = OECD3 or OECD13 for ReportingFI, then a ReportingGroup has to be provided with therein a NilReport or one or more AccountReports with DocTypeIndic = OECD3 or OECD13 or AccountReports with that DocTypeIndic and if applicable, Sponsor with the same DocTypeIndic.	Deletion of a ReportingFI shall only be possible if the ReportingGroup is also deleted.
112	If MessageTypeIndic = CRS701, then all DocTypeIndic in DocRef have to be equal to OECD1 or OECD11.	MessageTypeIndic in combination with all DocTypeIndic in DocRef	For new supply, DocTypeIndic has to be equal to OECD1 (production) or OECD11 (test)
113	If MessageTypeIndic = CRS702, then all DocTypeIndic in DocRef have to be equal to OECD2 or OECD3 or OECD12 or OECD13.	MessageTypeIndic in combination with all DocTypeIndic in DocRef	For correction supply, DocTypeIndic has to be equal to OECD2 or OECD3 (production) or OECD12 or OECD13 (test)
114	If MessageTypeIndic = CRS701, then the ReportingGroup may not contain a NilReport (NilReports have to be supplied in a report with MessageTypeIndic = CRS703)..	MessageTypeIndic in combination with availability of a NilReport in ReportingGroup.	In a supply of new data, no NilReport may appear in the ReportingGroup.

**PLEASE NOTE**

Controls have been adapted where necessary.

**PLEASE NOTE**

*Controls 2, 18, 20, 73, 75, 91 and 92 are not applicable as from fiscal year 2016 and have been deleted from the overview. Controls 93 and 94 were mistakenly not mentioned in version 2.0. Controls 95 to 114 are new with regard to fiscal year 2015 and are applicable as from fiscal year 2016.*