

Common errors to avoid in completing FATCA/CRS Entity Self-Certification forms

Here is a list of common errors that Citi has identified when reviewing FATCA/CRS Entity Self-Certification forms submitted by its clients. Many of these errors result from a failure to provide mandatory information on the form. To avoid having your FATCA/CRS Entity Self-Certification forms being rejected by Citi, you may wish to perform a self-check by seeing whether any of these errors were made on your form. If so, you may need to prepare a new form with the corrected information before submitting it to Citi. Please note that this list is not an all-inclusive list of possible errors.

Short Description of Error	Explanation of Error
Incomplete permanent and/or mailing	The full address needs to be entered. This would
address	include entering the full residence address and
	country name.
Country of Tax Residence and related Taxpayer Identification Number section has missing information.	Please fully complete the table indicating the Account Holder's tax residence country or countries (i.e. where the entity is treated as a resident of the country for purposes of that country's income tax) and the Account Holder's TIN (if any) for each country indicated. If the Account Holder is tax resident in more than three countries, please use a separate sheet. If a TIN is unavailable, please provide the appropriate reason A, B or C as defined below: Reason A — The country where the Account Holder is liable to pay tax does not issue TINs to its residents Reason B — The Account Holder is unable to obtain a TIN or equivalent number (If this reason is selected, please explain why the Account Holder is unable to obtain a TIN in the below table) Reason C — No TIN is required because the tax residence jurisdiction that issued the TIN does not require a Financial Institution to collect and report
	the TIN
Corresponding FATCA status not checked	If Active NFFE is marked, complete Part 3. If
	Publicly Traded NFFE or NFFE Affiliate of a Publicly
	Traded Entity is marked, complete Part 4.

Part 2B for Beneficial owner status not marked TIN entered in improper format	Required field that must be completed. The selection represents your classification under US tax principles even though your entity is not incorporated in the US. If not marked, the form will not be accepted. Since we cannot accept a FATCA/CRS Combination form for certain categories like Partnership, Disregarded entities, Simple trusts we require the beneficial owner to be checked on the tax form. Format of TIN should match to format for that
	country's TIN.
Form rejected due to being submitted for US entity or US account	FATCA/CRS Entity Self-Certification forms can only be used by non-USA entities for offshore (non-USA) accounts.
Client selects FATCA status that is not applicable to the FATCA/CRS certification form	The FATCA/CRS Entity Self-Certification form can only be used by Active NFFE and Publicly Traded NFFE or NFFE affiliate of a Publicly Traded Entity.
Multiple selections completed on the form for FATCA status	Only one FATCA selection can be entered on the form. It is either Active NFFE or it is a Publicly Traded NFFE or NFFE affiliate of a Publicly Traded Entity.
CRS country indicia triggered (additional country listed on the form/or in our internal records)	Indicia is referring to an indicator that an entity could be considered as a tax resident in another country. For CRS purposes, if the country triggering indicia is a CRS adoptive country we would expect it to be entered on the form for tax residency. Otherwise, we need explanation from client for why that country is not entered as a country of tax residency.
Capacity is provided as POA, supporting docs not provided	We need the power of attorney or similar document that clearly shows the signer is authorized and granted authority to sign on behalf of the entity entered on line one of the tax form.
DocuSign/AdobeSign on form, missing Certification of Completion/Signer Certificate	The certificate of completion provides specific details relating to the person signing and reference to the document being signed. The certificate of completion is required for the tax team to proceed for validation.
US address listed on line 7 of form for mailing address. Requires formation documents to substantiate foreign status	The USA address triggers "indicia." Indicia is an indicator that an entity could be considered as a tax resident in another country. Formation documents needed to confirm where the entity is incorporated. Formation documents may include,

	but not limited to certificate of incorporation, articles of association, certificate of limited partnership, memorandum of association, trust agreement, offering memorandum/fund prospectus.
Entity name does not match our books and	Entity name on form is expected to match to the
records	account holder opening the account.
Country of incorporation on line 2 does not	Country of incorporation is expected to match
match our books and records	what is on record for the account holder
	internally.
Certification section not completed	Certification section is required to be completed
	as it attests signer is authorized and information
	provided is accurate. Signature, print name, date
	and capacity need to be entered on the form.