TRANS-WORLD COMPLIANCE, INC.
FATCA ONE™

FATCA compliance simplified.

IRS Reporting Requirements

- Reporting Requirements Review
- Model 1, Model 2, and Model 1, Option 2
- The IRS Reporting Process
- Using systems as a solution

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IRS Reporting Requirements

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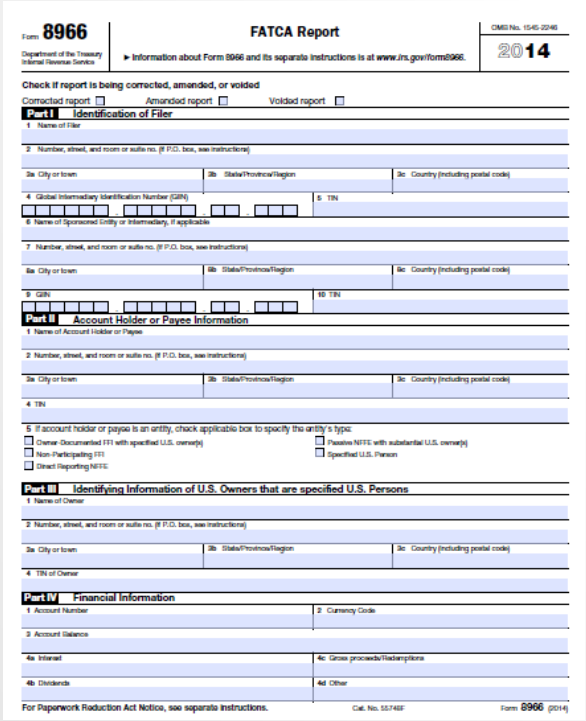
8966 FATCA Form



Form **8966** — Department of the Treasury, Internal Revenue Service

FATCA Report

▶ Information about Form 8966 and its separate instructions is at www.irs.gov/form8966.

OMB No. 1545-2246

2014

Check if report is being corrected, amended, or voided

Corrected report ☐ Amended report ☐ Voided report ☐

Part I Identification of Filer

1 Name of Filer

2 Number, street, and room or suite no. (if P.O. box, see instructions)

3a City or town | 3b State/Province/Region | 3c Country (including postal code)

4 Global Intermediary Identification Number (GIIN) | 5 TIN

6 Name of Sponsored Entity or Intermediary, if applicable

7 Number, street, and room or suite no. (if P.O. box, see instructions)

8a City or town | 8b State/Province/Region | 8c Country (including postal code)

9 GIIN | 10 TIN

Part II Account Holder or Payee Information

1 Name of Account Holder or Payee

2 Number, street, and room or suite no. (if P.O. box, see instructions)

3a City or town | 3b State/Province/Region | 3c Country (including postal code)

4 TIN

5 If account holder or payee is an entity, check applicable box to specify the entity's type:

☐ Owner-Documented FFI with specified U.S. owner(s)
☐ Non-Participating FFI
☐ Direct Reporting NFFE
☐ Passive NFFE with substantial U.S. owner(s)
☐ Specified U.S. Person

Part III Identifying Information of U.S. Owners that are specified U.S. Persons

1 Name of Owner

2 Number, street, and room or suite no. (if P.O. box, see instructions)

3a City or town | 3b State/Province/Region | 3c Country (including postal code)

4 TIN of Owner

Part IV Financial Information

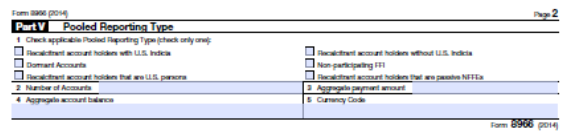
1 Account Number | 2 Currency Code

3 Account Balance

4a Interest | 4c Gross proceeds/Redemptions

4b Dividends | 4d Other

For Paperwork Reduction Act Notice, see separate instructions. Cat. No. 55748F Form 8966 (2014)



Form 8966 (2014) Page 2

Part V Pooled Reporting Type

1 Check applicable Pooled Reporting Type (check only one):

☐ Recalcitrant account holders with U.S. Indicia
☐ Dormant Accounts
☐ Recalcitrant account holders that are U.S. persons
☐ Recalcitrant account holders without U.S. Indicia
☐ Non-participating FFI
☐ Recalcitrant account holders that are passive NFFEs

2 Number of Accounts | 3 Aggregate payment amount

4 Aggregate account balance | 5 Currency Code

Form 8966 (2014)

Part 1: Filer and Sponsors

Part 2: Account Holder

Part 3: US Owners

Part 4: Financial Information

Part 5: Pooled Reporting

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8966 FATCA Form

Form 8966 Completion

FILER	SEPARATE FORM 8966 FOR EACH	COMPLETE PARTS
PFFI	U.S. account held by a specified U.S. person	I, II, and IV
	Substantial U.S. owner of a passive NFFE (passive NFFE is holder of the U.S. account)	I, II, III, and IV
	Specified U.S. person owning certain equity or debt interests in an ODFFI for which you act as a designated withholding agent	I, II, III, and IV
	Account held by nonparticipating FFI (unless pooled reporting is applicable)	I, II, IV
	Pooled Reporting for recalcitrant account holders (or non-consenting U.S. accounts) or nonparticipating FFIs	I and V
WITHHOLDING AGENT	Specified U.S. person owning certain equity or debt interests in an ODFFI to which the withholding agent makes a withholdable payment	I, II, III, and IV
	Substantial U.S. owner of a passive NFFE to which the withholding agent makes a withholdable payment	I, II, III, and IV
DIRECT REPORTING NFFE	Substantial U.S. owner of a direct reporting NFFE	I, II, III, and IV

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SIMPLE EXAMPLE 1

Problem: Bank A has a US customer David Olenzak with a savings account balance of $40,320 and a checking account balance of $18,975.

David Olenzak	Savings	Account #343583	$40,320
David Olenzak	Checking	Account #892423	$18,975

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SIMPLE EXAMPLE 1

Problem: Bank A has a US customer David Olenzak with a savings account balance of $40,320 and a checking account balance of $18,975.

David Olenzak	Savings	Account #343583	$40,320
David Olenzak	Checking	Account #892423	$18,975

We need two FATCA 8966 forms submitted.

FATCA Form Part 1: Reporting Institution is Bank A information
FATCA Form Part 2: Account Holder is David Olenzak
FATCA Form Part 3: (blank)
FATCA Form Part 4: Financial Information will be Account #343583 for $40,320

FATCA Form Part 1: Reporting Institution is Bank A information
FATCA Form Part 2: Account Holder is David Olenzak
FATCA Form Part 3: (blank)
FATCA Form Part 4: Financial Information will be Account #892423 for $18,975

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HIERARCHY EXAMPLE 1

Problem: Bank A has a customer XYZ Company, a Passive NFFE with an account balance of $340,900. XYZ Company has three substantial US owners: Aaron, David, and Moe.

XYZ Company	$340,900
├── Aaron	(none)
├── David	(none)
└── Moe	(none)

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US INTERNAL REVENUE SERVICE (IRS) CODE

- **A. Income Taxes (sections 1 through 1564)**
  - Chapter 1—NORMAL TAXES AND SURTAXES (sections 1 through 1400U3)
  - Chapter 2—TAX ON SELF-EMPLOYMENT INCOME (sections 1401 through 1403)
  - **Chapter 3—WITHHOLDING OF TAX ON NONRESIDENT ALIENS AND FOREIGN CORPORATIONS (sections 1441 through 1464)**
  - **Chapter 4—TAXES TO ENFORCE REPORTING ON CERTAIN FOREIGN ACCOUNTS (sections 1471–1474)**
  - Chapter 5—Repealed (sections 1491-1494)
  - Chapter 6—CONSOLIDATED RETURNS (sections 1501 through 1564)
- B. Estate and Gift Taxes (sections 2001 through 2801)
- C. Employment Taxes (sections 3101 through 3510)
- D. Miscellaneous Excise Taxes (sections 4001 through 5000)
- E. Alcohol, Tobacco, and Certain Other Excise Taxes (sections 5001 through 5891)
- F. Procedure and Administration (sections 6001 through 7874)
- G. The Joint Committee on Taxation (sections 8001 through 8023)
- H. Financing of Presidential Election Campaigns (sections 9001 through 9042)
- I. Trust Fund Code (sections 9500 through 9602)
- J. Coal Industry Health Benefits (sections 9701 through 9722)
- K. Group Health Plan Requirements (sections 9801 through 9834)

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W8-BEN-E

Part I **Identification of Beneficial Owner**

1	Name of organization that is the beneficial owner	2	Country of incorporation or organization
3	Name of disregarded entity receiving the payment (if applicable)		

4 Chapter 3 Status (entity type) (Must check one box only):

☐ Corporation ☐ Disregarded entity ☐ Partnership

☐ Simple trust ☐ Grantor trust ☐ Complex trust ☐ Estate ☐ Government

☐ Central Bank of Issue ☐ Tax-exempt organization ☐ Private foundation

If you entered disregarded entity, partnership, simple trust, or grantor trust above, is the entity a hybrid making a treaty claim? If "Yes" complete Part III. ☐ Yes ☐ No

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W8-BEN-E

5 Chapter 4 Status (FATCA status) (Must check one box only unless otherwise indicated). (See instructions for details and complete the certification below for the entity's applicable status).

- ☐ Nonparticipating FFI (including a limited FFI or an FFI related to a Reporting IGA FFI other than a registered deemed-compliant FFI or participating FFI).
- ☐ Participating FFI.
- ☐ Reporting Model 1 FFI.
- ☐ Reporting Model 2 FFI.
- ☐ Registered deemed-compliant FFI (other than a reporting Model 1 FFI or sponsored FFI that has not obtained a GIIN).
- ☐ Sponsored FFI that has not obtained a GIIN. Complete Part IV.
- ☐ Certified deemed-compliant nonregistering local bank. Complete Part V.
- ☐ Certified deemed-compliant FFI with only low-value accounts. Complete Part VI.
- ☐ Certified deemed-compliant sponsored, closely held investment vehicle. Complete Part VII.
- ☐ Certified deemed-compliant limited life debt investment entity. Complete Part VIII.
- ☐ Certified deemed-compliant investment advisors and investment managers. Complete Part IX.
- ☐ Owner-documented FFI. Complete Part X.
- ☐ Restricted distributor. Complete Part XI.
- ☐ Nonreporting IGA FFI (including an FFI treated as a registered deemed-compliant FFI under an applicable Model 2 IGA). Complete Part XII.
- ☐ Foreign government, government of a U.S. possession, or foreign central bank of issue. Complete Part XIII.
- ☐ International organization. Complete Part XIV.
- ☐ Exempt retirement plans. Complete Part XV.
- ☐ Entity wholly owned by exempt beneficial owners. Complete Part XVI.
- ☐ Territory financial institution. Complete Part XVII.
- ☐ Nonfinancial group entity. Complete Part XVIII.
- ☐ Excepted nonfinancial start-up company. Complete Part XIX.
- ☐ Excepted nonfinancial entity in liquidation or bankruptcy. Complete Part XX.
- ☐ 501(c) organization. Complete Part XXI.
- ☐ Nonprofit organization. Complete Part XXII.
- ☐ Publicly traded NFFE or NFFE affiliate of a publicly traded corporation. Complete Part XXIII.
- ☐ Excepted territory NFFE. Complete Part XXIV.
- ☐ Active NFFE. Complete Part XXV.
- ☐ Passive NFFE. Complete Part XXVI.
- ☐ Excepted inter-affiliate FFI. Complete Part XXVII.
- ☐ Direct reporting NFFE.
- ☐ Sponsored direct reporting NFFE. Complete Part XXVIII.

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W8-BEN-E

Part XXVI Passive NFFE

40a ☐ I certify that the entity identified in Part I is a foreign entity that is not a financial institution (other than an investment entity organized in a possession of the United States) and is not certifying its status as a publicly traded NFFE (or affiliate), excepted territory NFFE, active NFFE, direct reporting NFFE, or sponsored direct reporting NFFE.

Check box 40b or 40c, whichever applies.

b ☐ I further certify that the entity identified in Part I has no substantial U.S. owners, or

c ☐ I further certify that the entity identified in Part I has provided the name, address, and TIN of each substantial U.S. owner of the NFFE in Part XXX.

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TWC's FATCA One™

Part XXX Substantial U.S. Owners of Passive NFFE

As required by Part XXVI, provide the name, address, and TIN of each substantial U.S. owner of the NFFE. Please see instructions for definition of substantial U.S. owner.

Name	Address	TIN

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TWC's FATCA One™

Part XXX **Substantial U.S. Owners of Passive NFFE**

As required by Part XXVI, provide the name, address, and TIN of each substantial U.S. owner of the NFFE. Please see instructions for definition of substantial U.S. owner.

Name	Address	TIN
Aaron Quade	123 Main St. Rockville MD 20850 USA	111-00-0001
Moe Bashir	215 Wolftrap Court Vienna VA 22182 USA	222-00-0002
David Olenzak	461 Foxchase Lane Media PA 19063 USA	333-00-0003

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HIERARCHY EXAMPLE 1

Problem: Bank A has a customer XYZ Company, a Passive NFFE with an account balance of $340,900. XYZ Company has three substantial US owners: Aaron, David, and Moe.

XYZ Company	$340,900
├── Aaron	(none)
├── David	(none)
└── Moe	(none)

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HIERARCHY EXAMPLE 1

Problem: Bank A has a customer XYZ Company, a Passive NFFE with an account balance of $340,900. XYZ Company has three substantial US owners: Aaron, David, and Moe.

XYZ Company	$340,900
├── Aaron	(none)
├── David	(none)
└── Moe	(none)

We need three FATCA 8966 forms submitted (one for each substantial US owner).
FATCA Form Part 1: Reporting Institution is Bank A information
FATCA Form Part 2: Account Holder is XYZ Company
FATCA Form Part 3: US owners will be Aaron, then David, then Moe
FATCA Form Part 4: Financial Information will be XYZ Company account information

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HIERARCHY EXAMPLE 2

Problem: Trust Administrator A only performs back office administration and is considered an Active NFFE. It offers to extend its client's contracts to provide FATCA reporting services. The Scrooge McDuck Trust takes up the offer and has Three US beneficiaries: Huey, Dewey, and Louie.

Scrooge McDuck	$4,000,000	Account value
├── Huey	$10,000	Disbursement
├── Dewey	$30,000	Disbursement
└── Louie	$5,000	Disbursement

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HIERARCHY EXAMPLE 2

Problem: Trust Administrator A only performs back office administration and is considered an Active NFFE. It offers to extend its client's contracts to provide FATCA reporting services. The Scrooge McDuck Trust takes up the offer and has Three US beneficiaries: Huey, Dewey, and Louie.

Scrooge McDuck	$4,000,000	Account value
├── Huey	$10,000	Disbursement
├── Dewey	$30,000	Disbursement
└── Louie	$5,000	Disbursement

We need three FATCA 8966 forms submitted (one for each substantial US owner).
FATCA Form Part 1: Reporting Institution is The Scrooge McDuck Trust information
FATCA Form Part 2: Account Holder is The Scrooge McDuck Trust
FATCA Form Part 3: US owners will be Huey, then Dewey, then Louie
FATCA Form Part 4: Financial Information will be Account Balance and disbursements

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IRS Reporting Requirements

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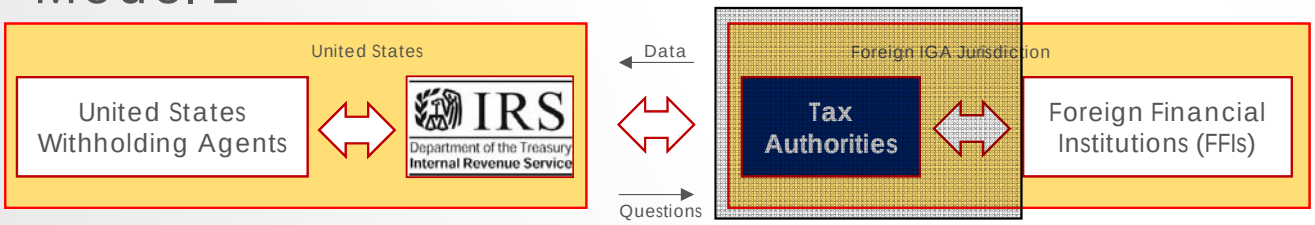
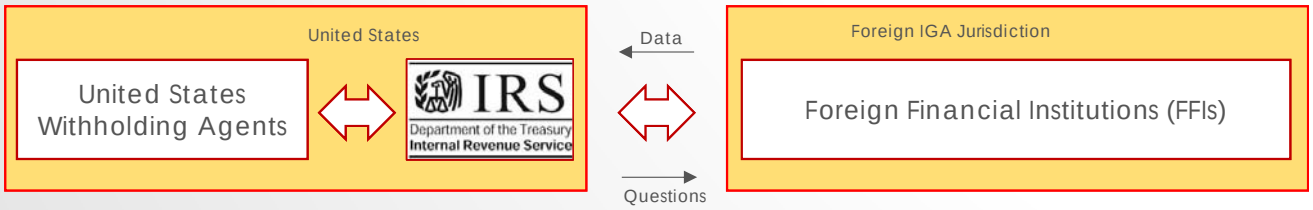
MODEL 1 AND MODEL 2

Model 1



Model 2



Remember some agreements (such as Canada and Mexico) are reciprocal.

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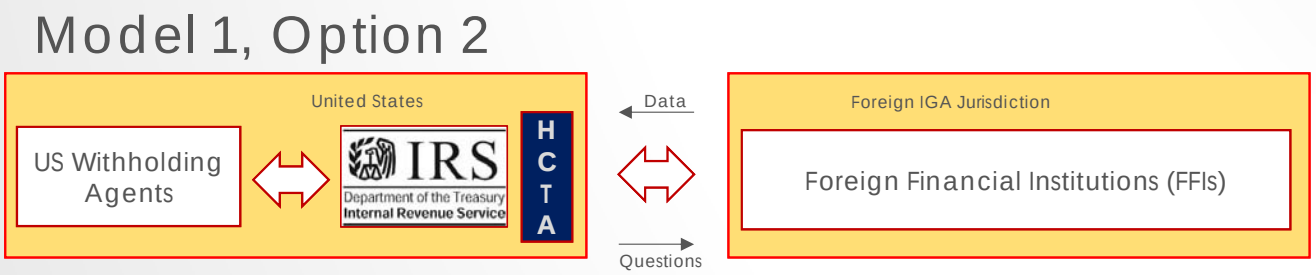
MODEL 1, OPTION 2



In Model 2, Option 1, the local tax authority uses the IRS reporting computers. FFIs report directly to the IRS and data is "embargoed" for seven days to give the Host Country Tax Authorities time to approve data.

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IRS Reporting Requirements

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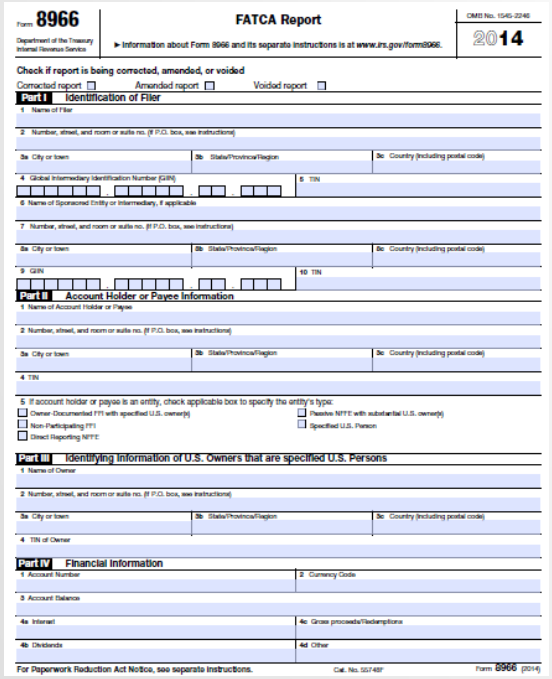
8966 Form Data Conversion into XML



Form **8966** — Department of the Treasury, Internal Revenue Service

FATCA Report

► Information about Form 8966 and its separate instructions is at www.irs.gov/form8966.

OMB No. 1545-2246

2014

Check if report is being corrected, amended, or voided

Corrected report ☐ Amended report ☐ Voided report ☐

Part I Identification of Filer

1 Name of Filer

2 Number, street, and room or suite no. (If P.O. box, see instructions)

3a City or town | 3b State/Province/Region | 3c Country (including postal code)

4 Global Intermediary Identification Number (GIIN) | 5 TIN

6 Name of Sponsored Entity or Intermediary, if applicable

7 Number, street, and room or suite no. (If P.O. box, see instructions)

8a City or town | 8b State/Province/Region | 8c Country (including postal code)

9 GIIN | 10 TIN

Part II Account Holder or Payee Information

1 Name of Account Holder or Payee

2 Number, street, and room or suite no. (If P.O. box, see instructions)

3a City or town | 3b State/Province/Region | 3c Country (including postal code)

4 TIN

5 If account holder or payee is an entity, check applicable box to specify the entity's type:

☐ Owner-Documented FFI with specified U.S. owner(s) ☐ Passive NFFE with substantial U.S. owner(s)

☐ Non-Participating FFI ☐ Specified U.S. Person

☐ Direct Reporting NFFE

Part III Identifying Information of U.S. Owners that are specified U.S. Persons

1 Name of Owner

2 Number, street, and room or suite no. (If P.O. box, see instructions)

3a City or town | 3b State/Province/Region | 3c Country (including postal code)

4 TIN of Owner

Part IV Financial Information

1 Account Number | 2 Currency Code

3 Account Balance

4a Interest | 4c Gross proceeds/Redemptions

4b Dividends | 4d Other

For Paperwork Reduction Act Notice, see separate instructions. Cat. No. 55748F Form **8966** (2014)

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IRS IDES PROCESS

Data Submission Process

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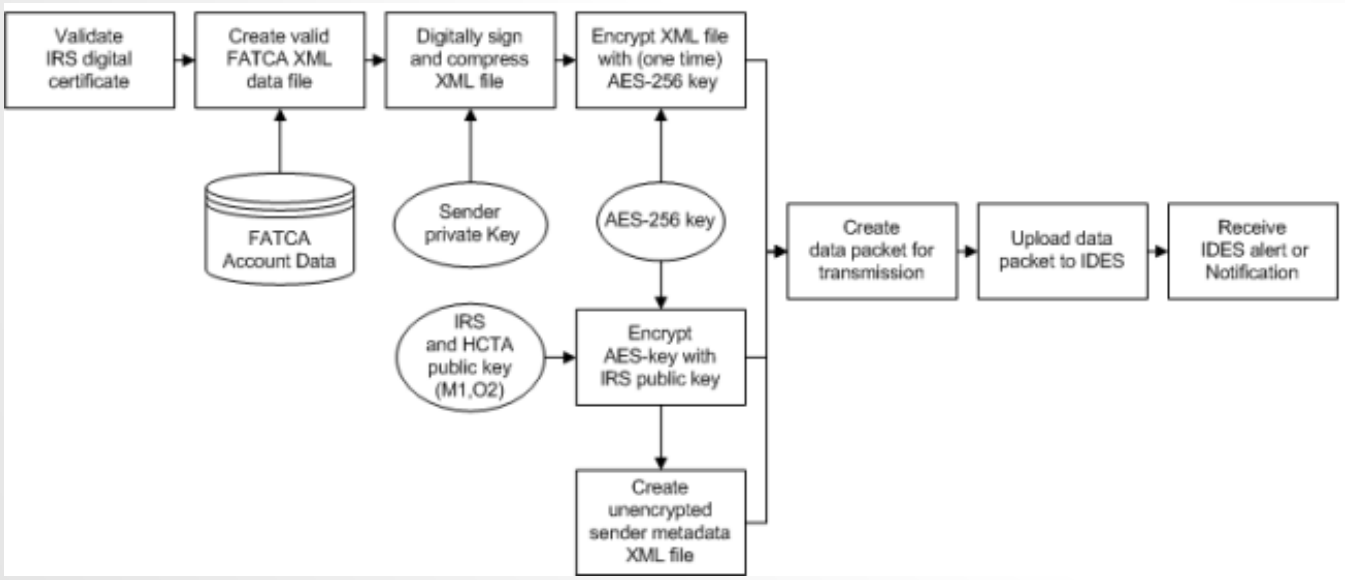
IRS IDES DATA SUBMISSION PROCESS



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IRS System Submission Process

Step 1: Prepare and validate the FATCA XML file; digitally sign the file. Use SHA2-256 hash algorithm and your private SSL key and an W3C XML enveloping signature syntax.

Step 2: Compress the FATCA XML file with a compatible zip utility.

Step 3: Encrypt the FATCA XML file with AES-256 key. AES encryptions should use ECB-256 cipher mode, no salt, with a key size of 32 bytes and PKCS#5 or PCKCS#7 padding.

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IRS System Submission Process

Step 4: Encrypt AES key with the public key of the recipient.
Encrypt the AES key using PKCS#1 v1.5 and 2048 bit RSA algorithm.

Step 5: Create sender metadata.
Use the "FATCA Metadata XML Schema v1.0 User Guide" to create metadata XML file.

Step 6: Create the transmission file.
Zip the metadata file, encrypted XML file, and encrypted key.

Step 7: Transmit the .zipped file.

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- Using systems as a solution

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INTRODUCING FATCA ONE™

- Introduction to Trans World Compliance, Inc.
- Assists with FATCA, UK FATCA, and CRS compliance
- Has multiple Rule Bases for a customized and localized solution including local tax reporting for IGA Model 1
- Supports the FATCA rules by flagging rows and fields
- Utilizes technology best practices for scalability and security
- Currently available as a hosted or installed solution

FATCA compliance simplified.

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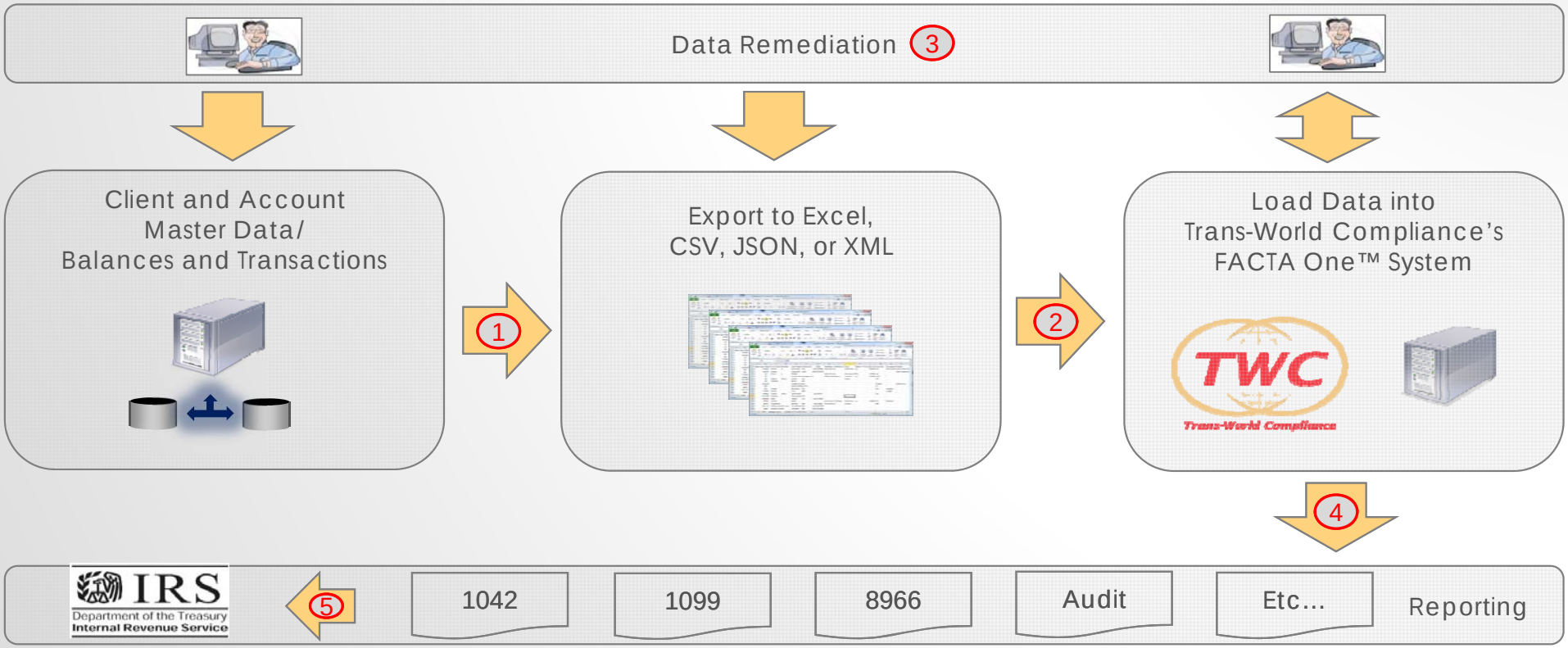
FATCA One™ Workflow



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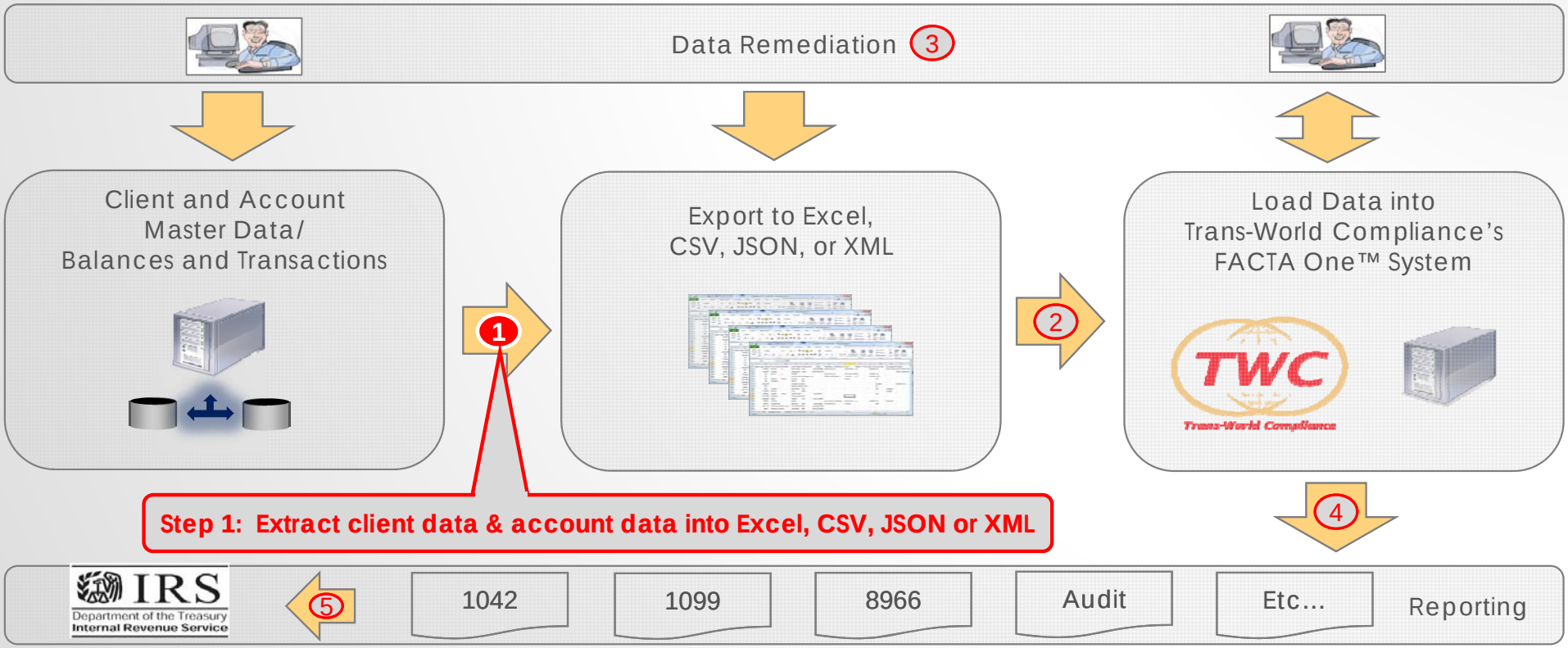
FATCA One™ Workflow



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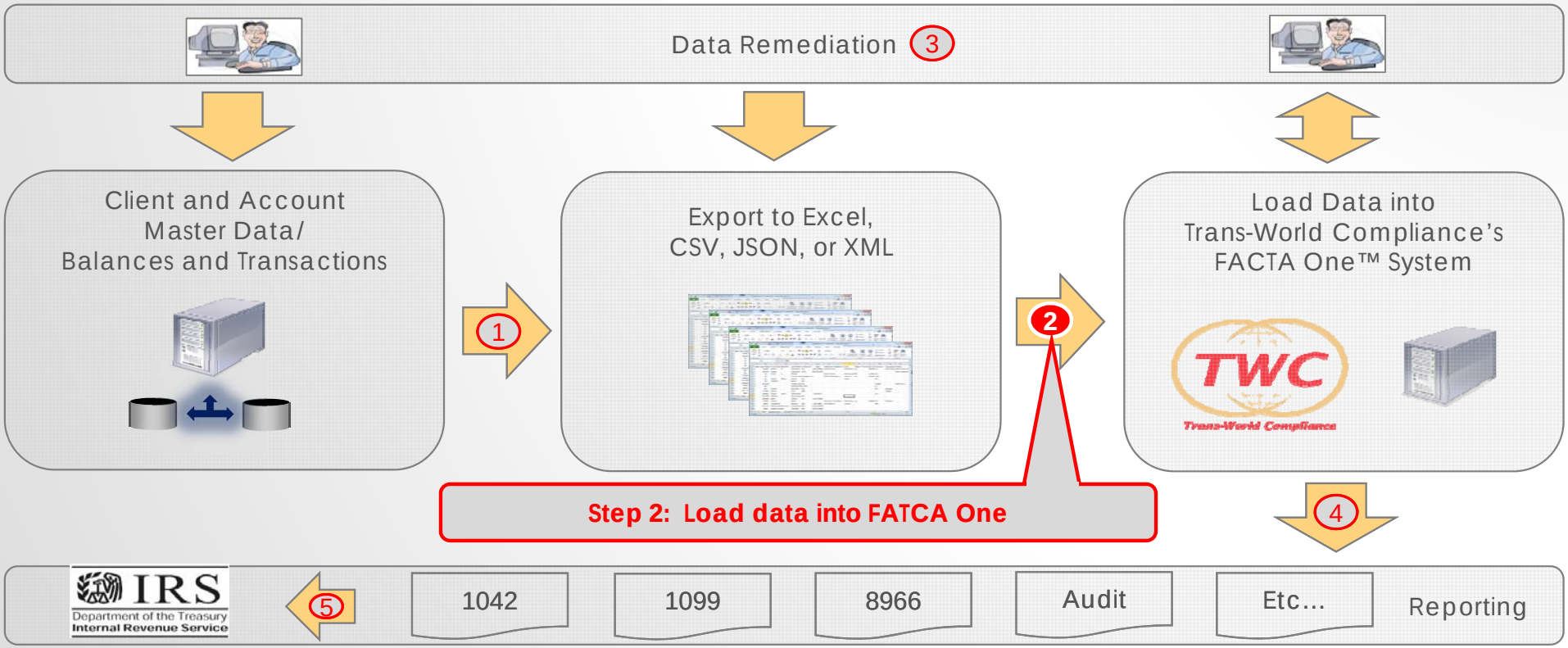
FATCA One™ Workflow



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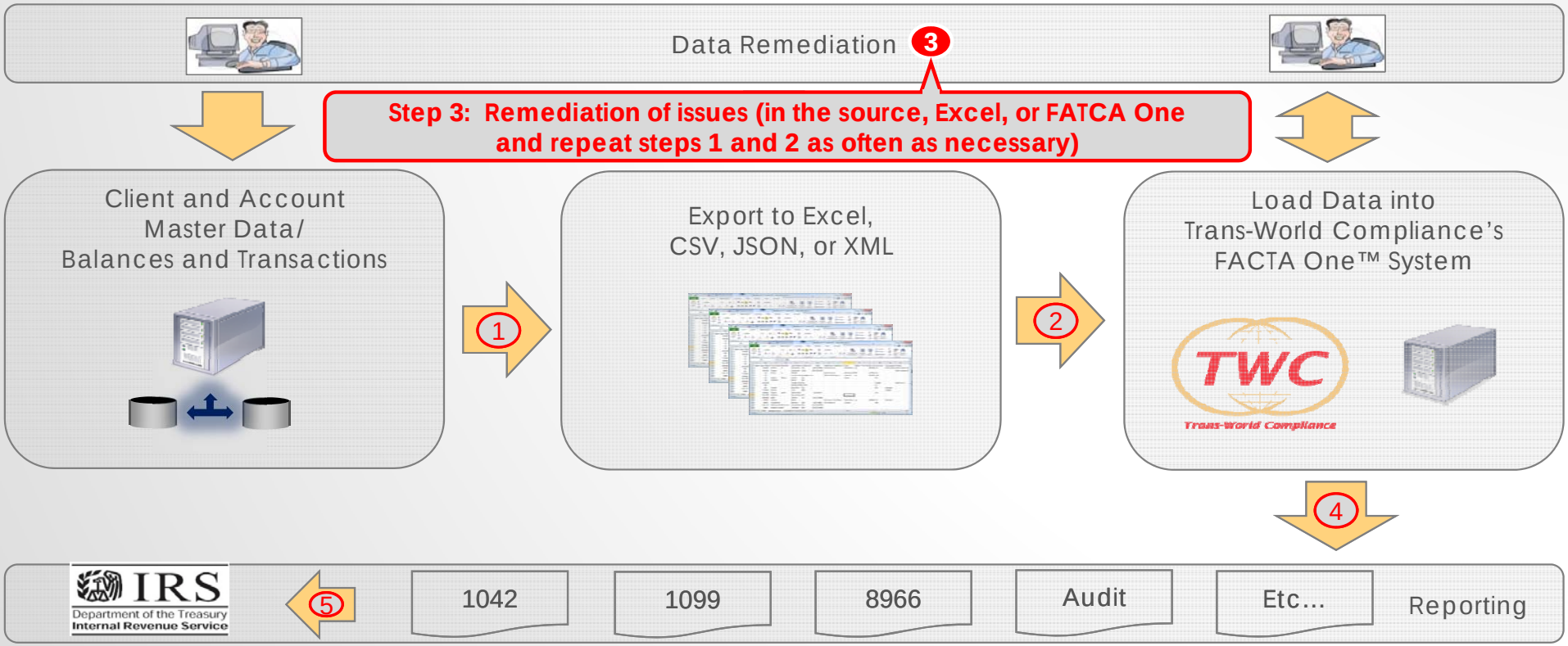
FATCA ONE™ WORKFLOW



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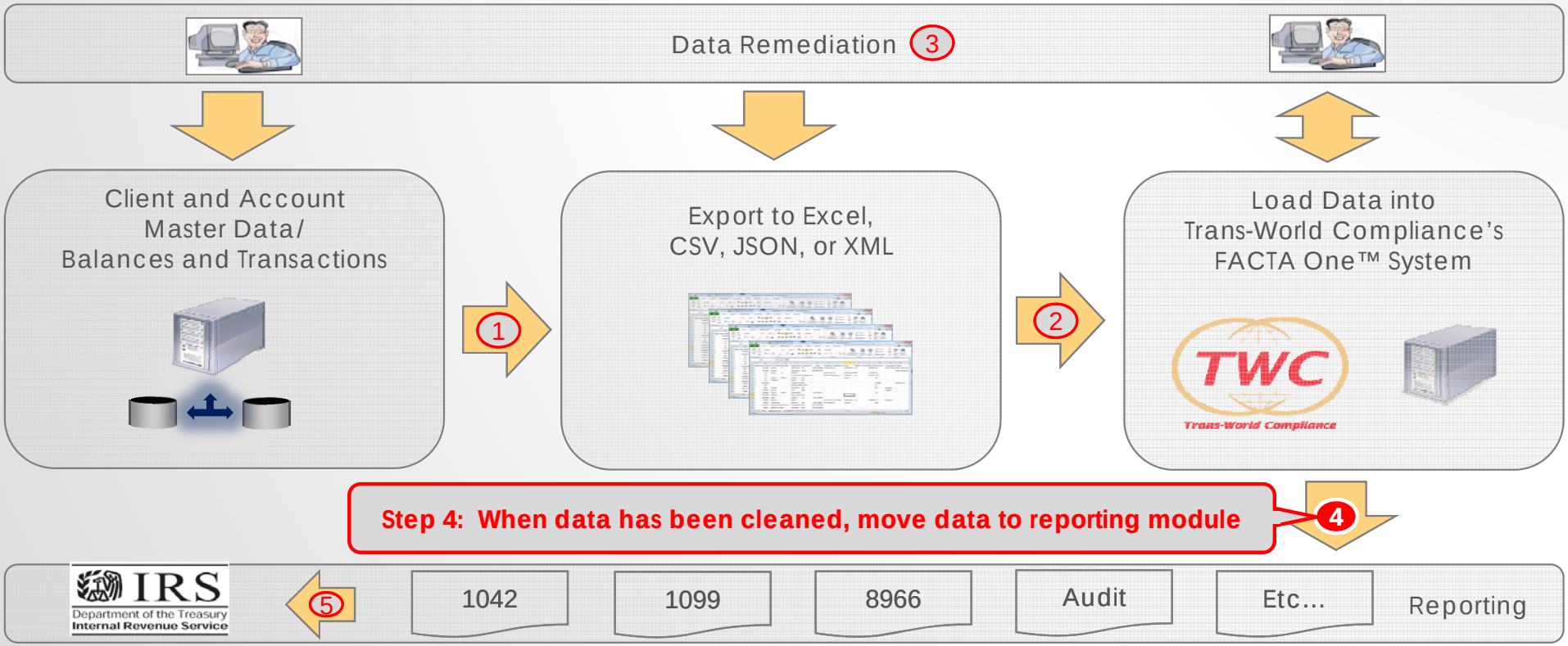
FATCA One™ Workflow



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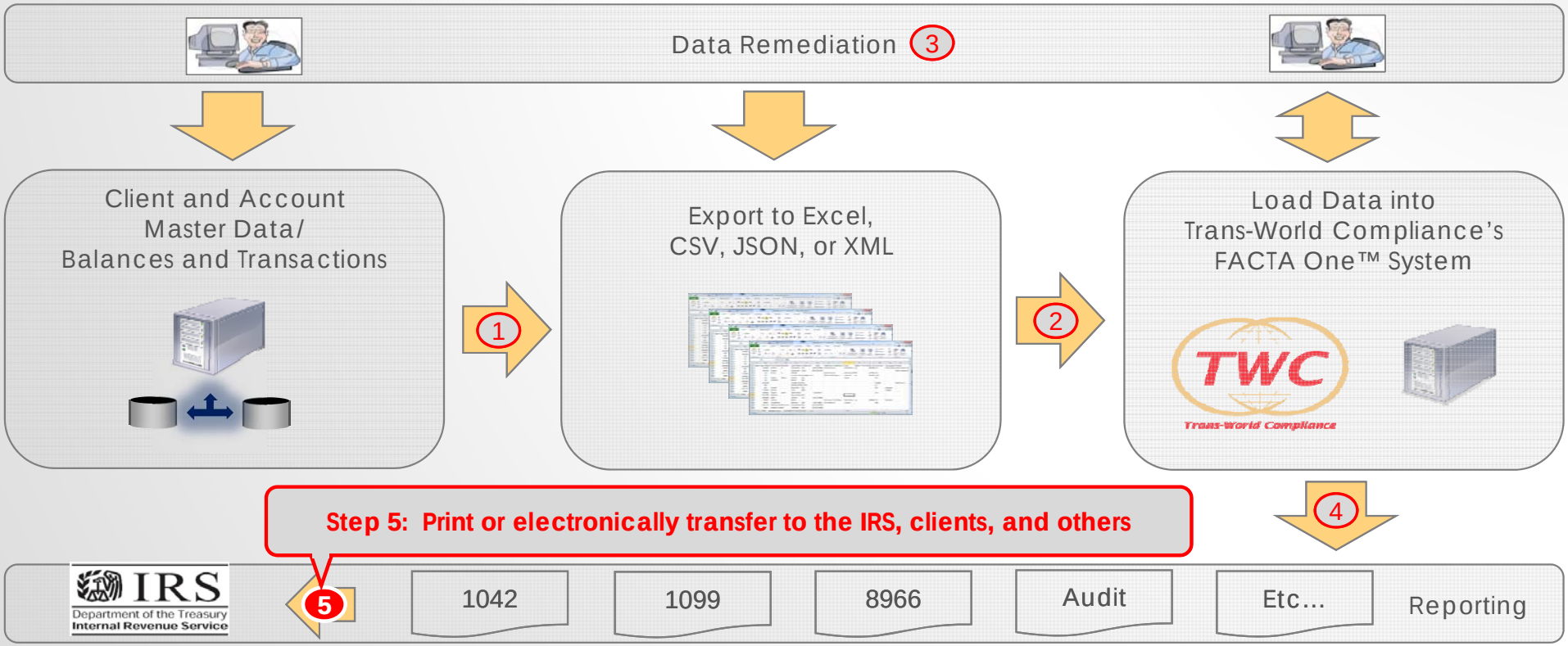
FATCA One™ Workflow



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HIERARCHY EXAMPLE 1

Problem: Bank A has a customer XYZ Company, a Passive NFFE with an account balance of $340,900. XYZ Company has three substantial US owners: Aaron, David, and Moe.

XYZ Company	$340,900
├── Aaron	(none)
├── David	(none)
└── Moe	(none)

We need three FATCA 8966 forms submitted (one for each substantial US owner).
FATCA Form Part 1: Reporting Institution is Bank A information
FATCA Form Part 2: Account Holder is XYZ Company
FATCA Form Part 3: US owners will be Aaron, then David, then Moe
FATCA Form Part 4: Financial Information will be XYZ Company account information

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HIERARCHY EXAMPLE 1

Table Contents

Entity:

Unique ID	Secondary Id	Entity Name	Entity Jurstiction	GIN
5653067		XYZ Company	KY	

Individual:

Unique ID	Secondary ID	First Name	Middle Name	Last Name	Date Of Birth	City/Town/Providence of Birth	Country of Birth	Citizenship
5653068		Aaron		Quade				US
5653069		Moe		Bashir				US
5653070		David		Olenzak				US

Accounts:

Unique ID	Account ID	Type	Insurance?	TaxYear	Currency Type	Amount
5653067		Account Balance	N		USD	340900

Hierarchy:

Parent Unique ID	Parent Secondary ID	Child Unique ID	Child Secondary ID	Comment	Reportable? Y(es, just GIIN) / N(o, use parent) / S(ponsor)
5653067		5653068			Y
5653067		5653069			Y
5653067		5653070			Y

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HIERARCHY EXAMPLE 2

Problem: Trust Administrator A only performs back office administration and is considered an Active NFFE. It offers to extend its client's contracts to provide FATCA reporting services. The Scrooge McDuck Trust takes up the offer and has Three US beneficiaries: Huey, Dewey, and Louie.

Scrooge McDuck	$4,000,000	Account value
├── Huey	$10,000	Disbursement
├── Dewey	$30,000	Disbursement
└── Louie	$5,000	Disbursement

We need three FATCA 8966 forms submitted (one for each substantial US owner).
FATCA Form Part 1: Reporting Institution is The Scrooge McDuck Trust information
FATCA Form Part 2: Account Holder is The Scrooge McDuck Trust
FATCA Form Part 3: US owners will be Huey, then Dewey, then Louie
FATCA Form Part 4: Financial Information will be Account Balance and disbursements

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HIERARCHY EXAMPLE 2

Table Contents

Entity:

Unique ID	Secondary Id	Entity Name	Entity Jurstiction	GIN
5653067		Scrooge McDuck Trust	KY	784560.00000.840.BG

Individual:

Unique ID	Secondary ID	First Name	Middle Name	Last Name	Date Of Birth	City/Town/Providence of Birth	Country of Birth	Citizenship
5653068		Huey		McDuck				US
5653069		Dewey		McDuck				US
5653070		Louis		McDuck				US

Accounts:

Unique ID	Account ID	Type	Insurance?	TaxYear	Currency Type	Amount
5653068	398702	Gross proceeds/Redemptions	N			10000
5653069	398703	Gross proceeds/Redemptions	N			30000
5653070	398704	Gross proceeds/Redemptions	N			5000
5653067	398702	Account Balance	N		USD	4000000
5653067	398703	Account Balance	N		USD	4000000
5653067	398704	Account Balance	N		USD	4000000

Hierarchy:

Parent Unique ID	Parent Secondary ID	Child Unique ID	Child Secondary ID	Comment	Reportable?
5653067		5653068			Y
5653067		5653069			Y
5653067		5653070			Y

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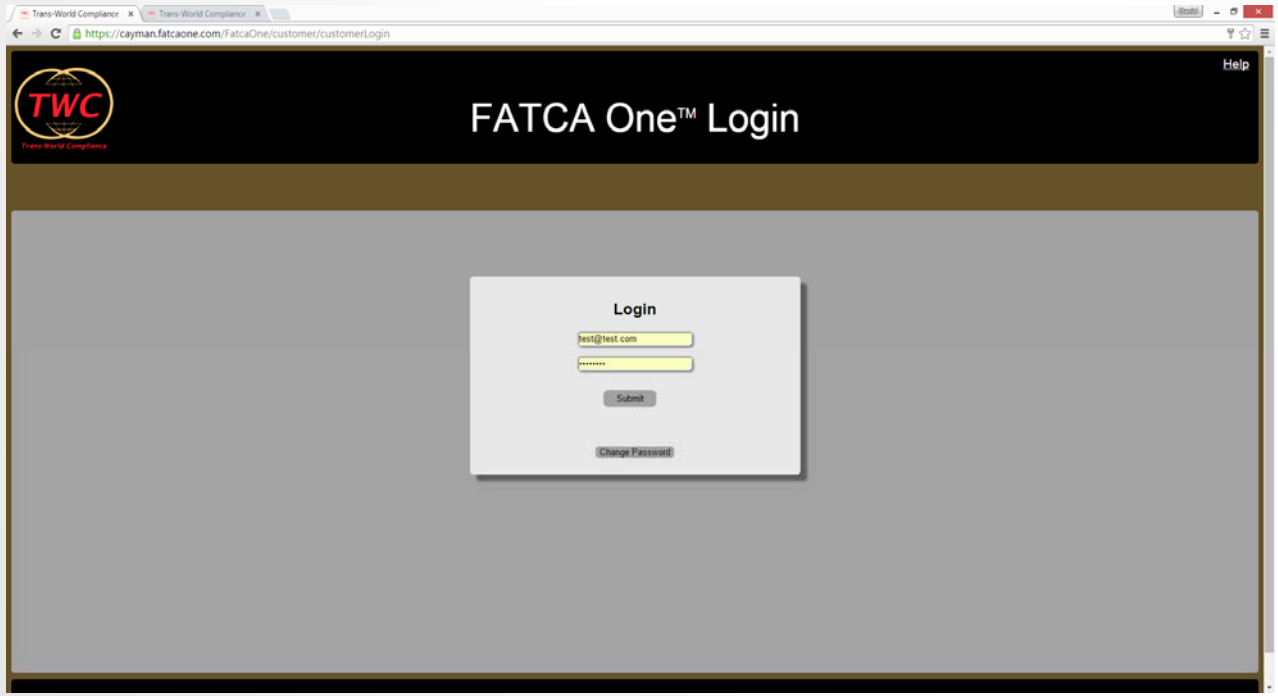
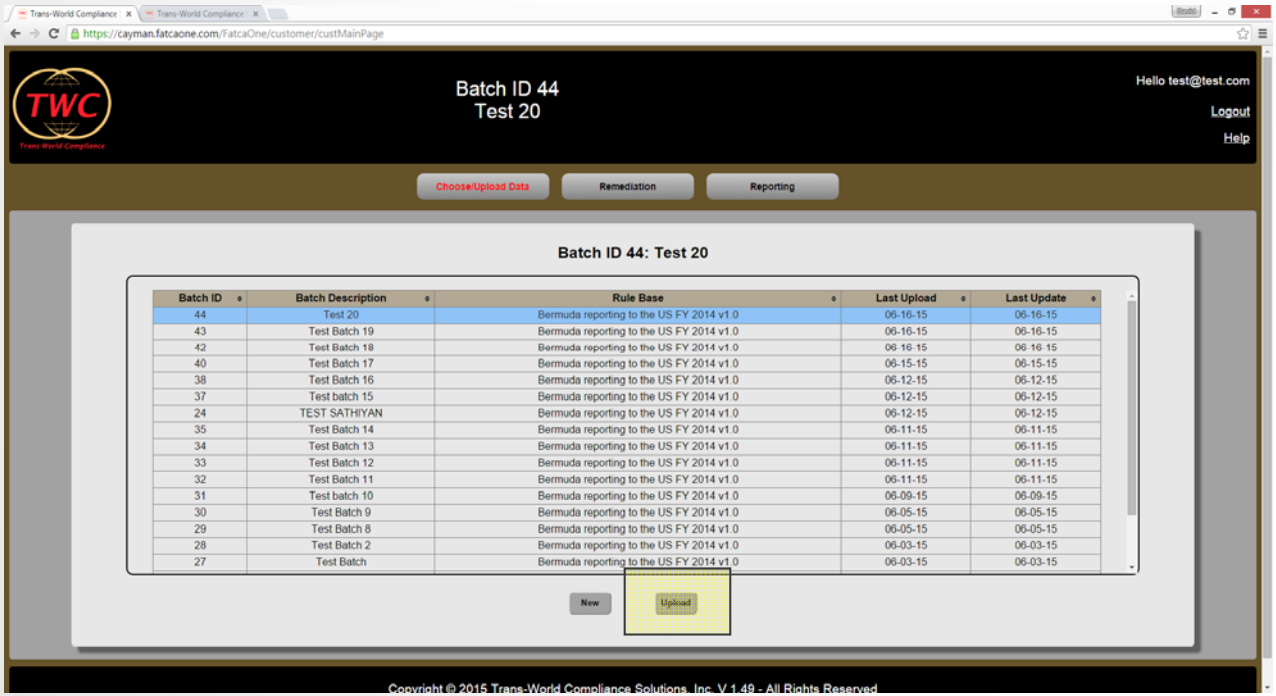
FATCA One Login



Copyright 2015, Trans-World Compliance, Inc.

CHOOSE A BATCH



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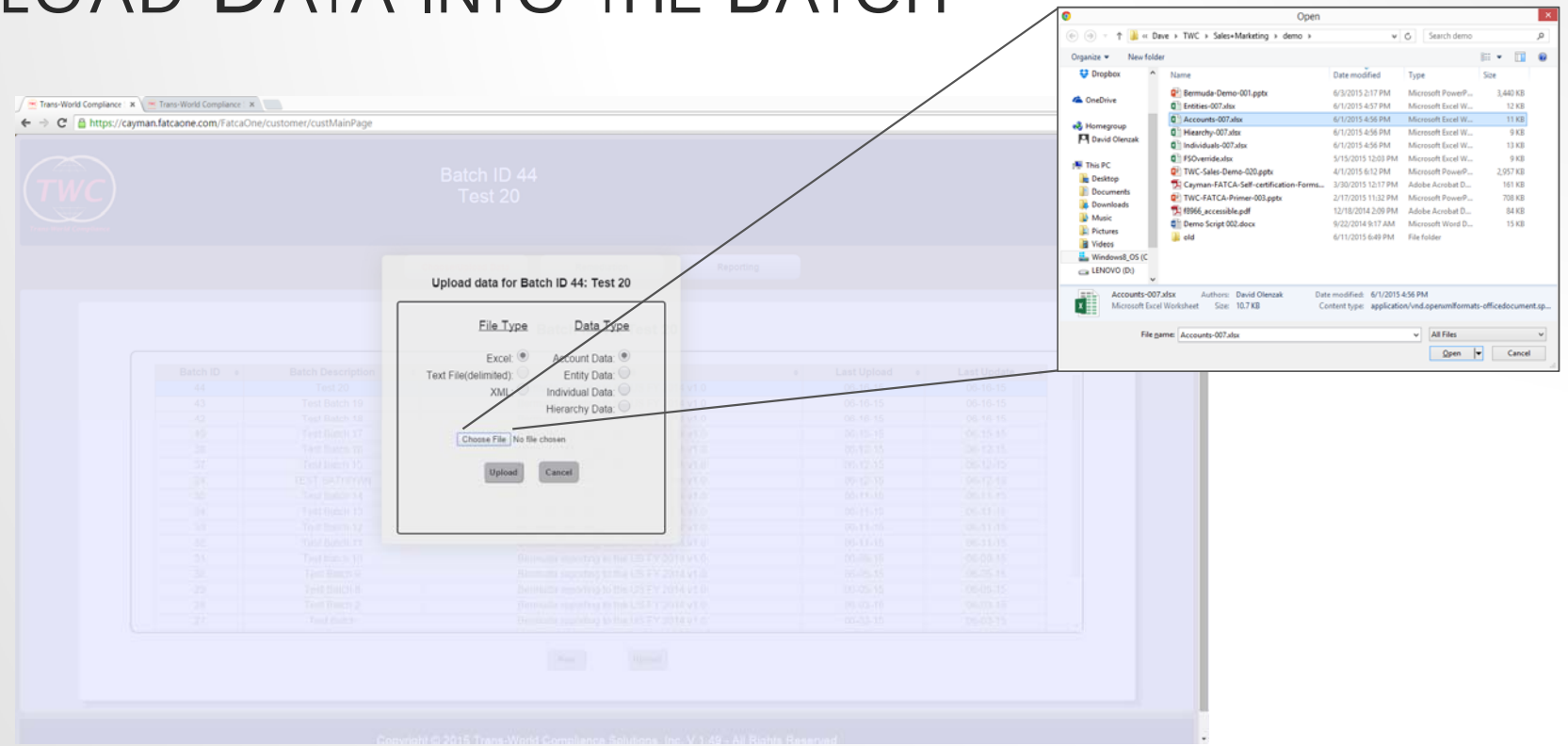
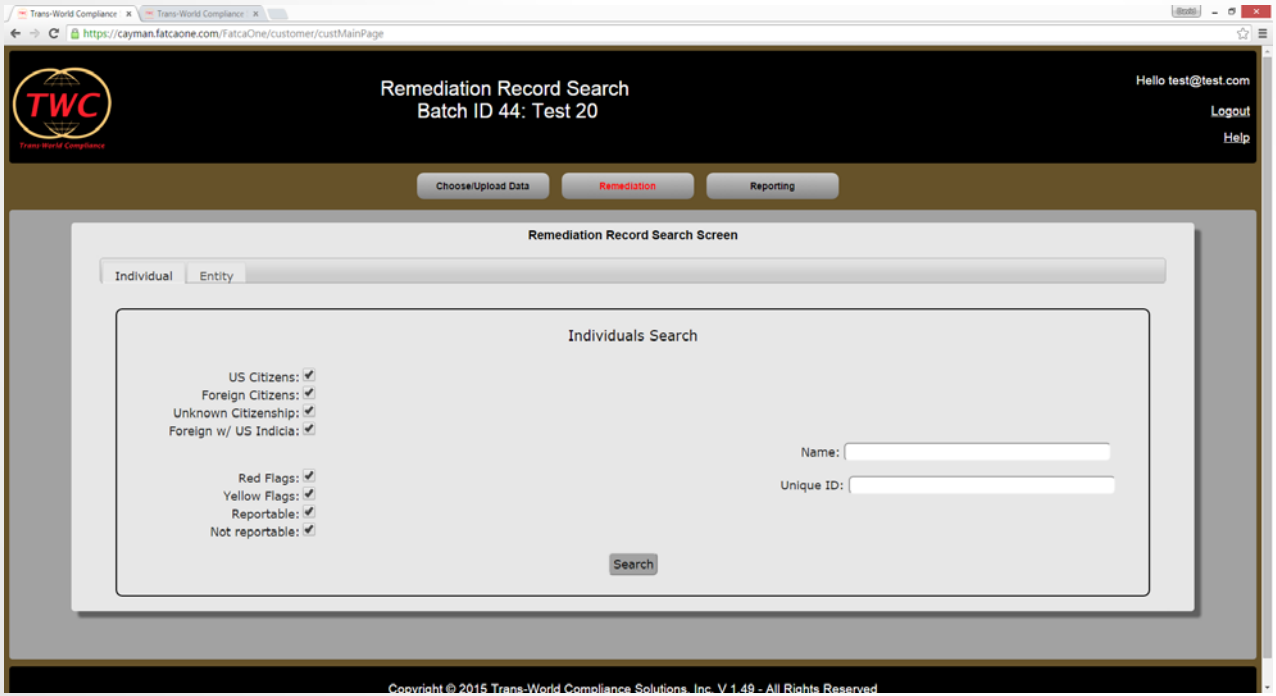
UPLOAD DATA INTO THE BATCH



Copyright 2015, Trans-World Compliance, Inc.

SELECT RECORDS TO VIEW



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SEARCH RESULTS SCREEN

Row status, click to remediate. (1)

Click to edit the record. (2)

(3) PDF Audit Report.

(4) Click to show any hierarchy relationships.

(X) = Will show detail in subsequent screens.

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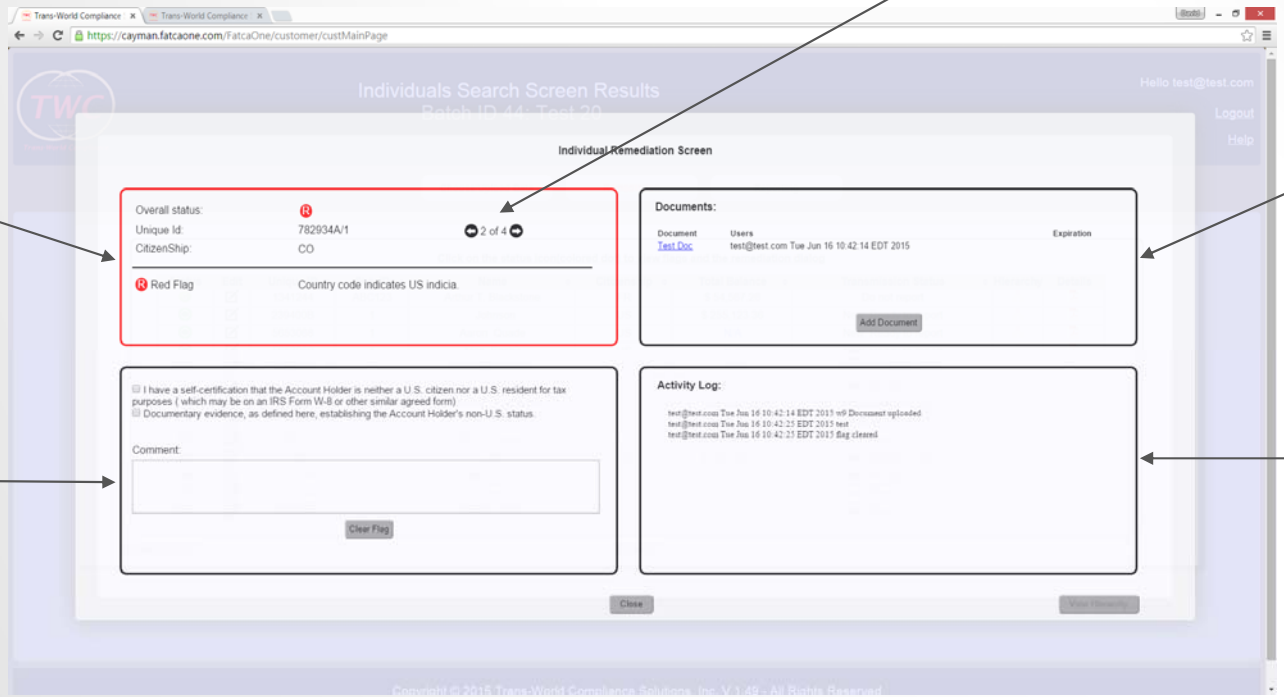
① REMEDIATION SCREEN

Page through the flags on this record.



Shows each flag, for example, this record has indicia of a US address.

Can upload and store files such as W-8, W-9, etc…

Directions to the analyst for this flag.

A complete audit log is maintained.

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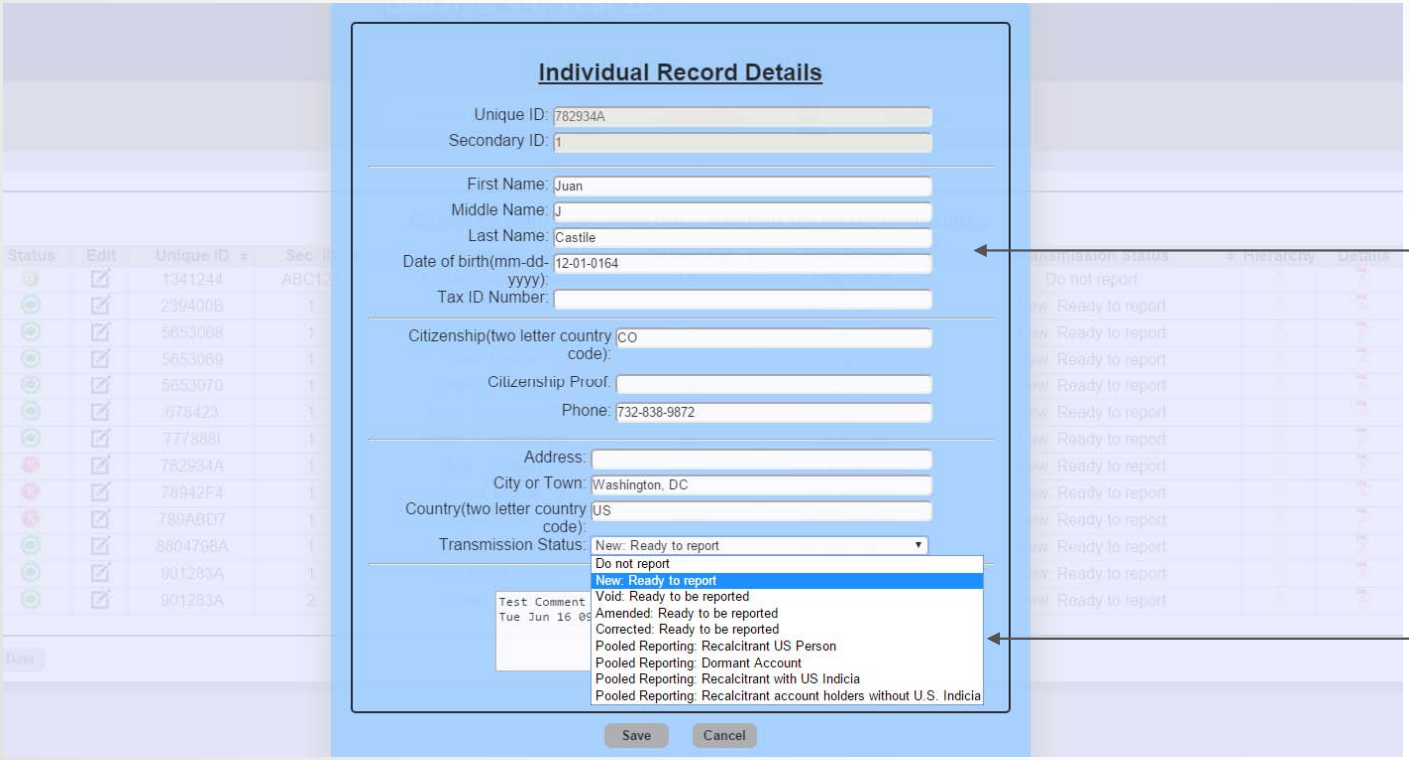
② EDIT SCREEN



Can edit data here or reload data to make updates and changes.

How to submit, void, corrected, and amended reports.

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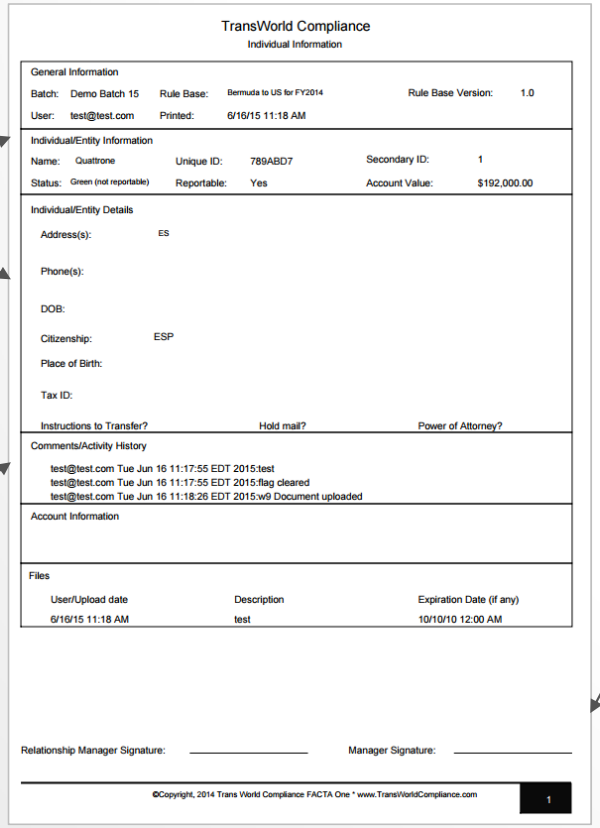
③ AUDIT PDF

All the data about the account.

Activity log of what compliance analysts did on the account and when.

Manager or relationship manager can physically sign-off on this report.



TransWorld Compliance

Individual Information

General Information

Batch: Demo Batch 15 Rule Base: Bermuda to US for FY2014 Rule Base Version: 1.0

User: test@test.com Printed: 6/16/15 11:18 AM

Individual/Entity Information

Name: Quattrone Unique ID: 789ABD7 Secondary ID: 1

Status: Green (not reportable) Reportable: Yes Account Value: $192,000.00

Individual/Entity Details

Address(s): ES

Phone(s):

DOB:

Citizenship: ESP

Place of Birth:

Tax ID:

Instructions to Transfer? Hold mail? Power of Attorney?

Comments/Activity History

test@test.com Tue Jun 16 11:17:55 EDT 2015:test
test@test.com Tue Jun 16 11:17:55 EDT 2015:flag cleared
test@test.com Tue Jun 16 11:18:26 EDT 2015:w9 Document uploaded

Account Information

Files

User/Upload date	Description	Expiration Date (if any)
6/16/15 11:18 AM	test	10/10/10 12:00 AM

Relationship Manager Signature: _____ Manager Signature: _____

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1

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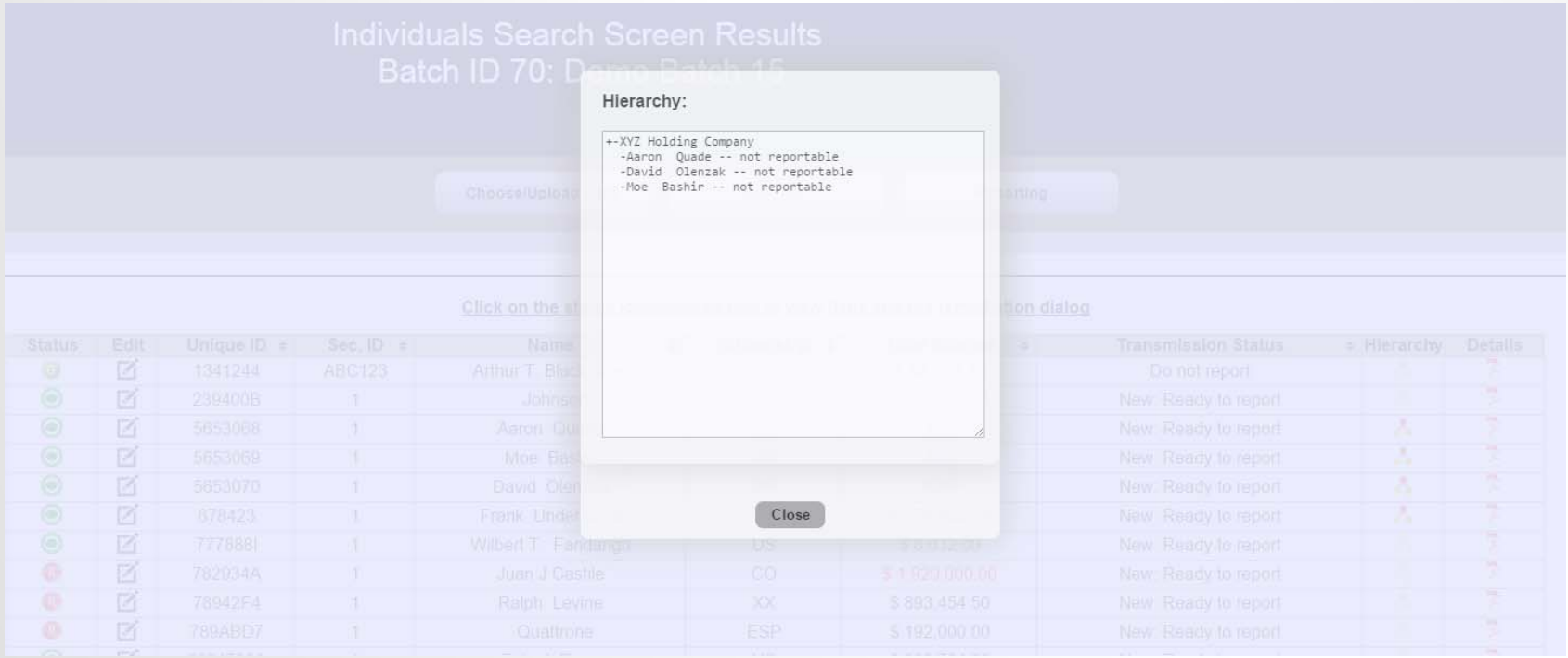
④ DISPLAY HIERARCHY ASSOCIATIONS



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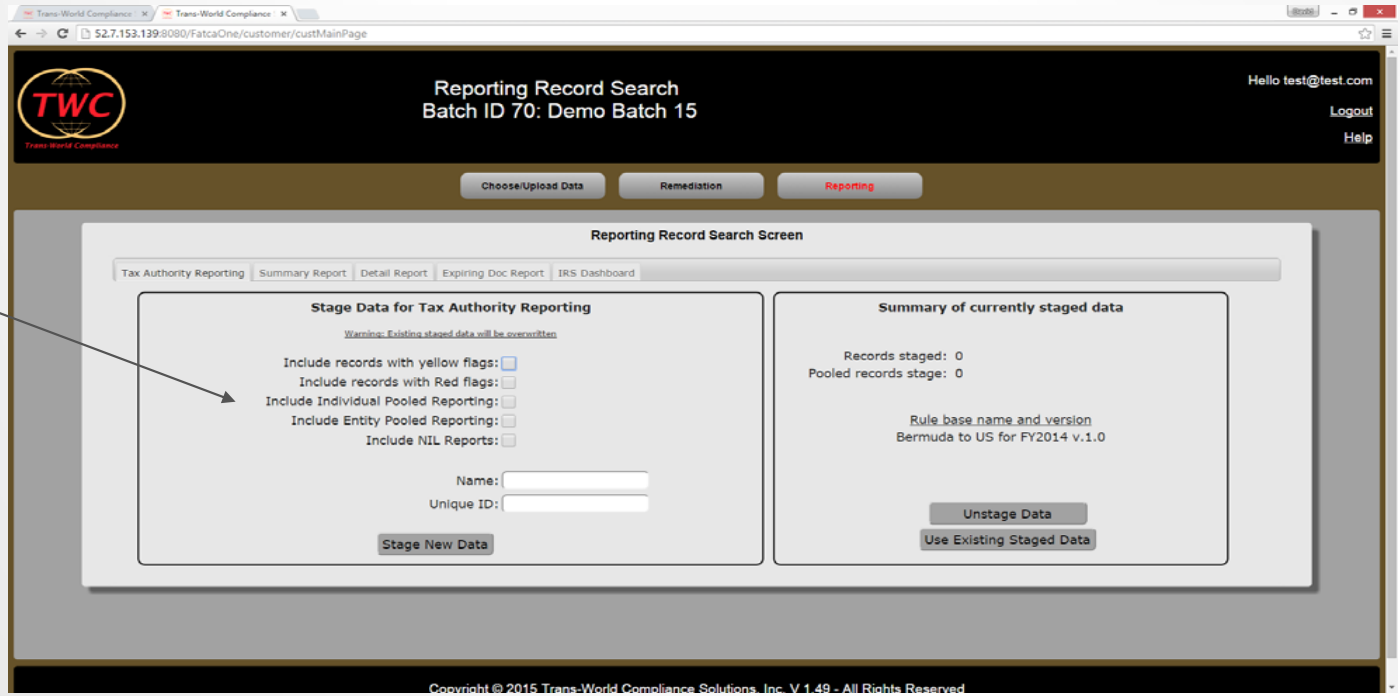
Tax Authority Reporting

FATCA One supports: Can include missing data (yellow flags), recalcitrant individuals (red flags), pooled reporting, and Nil reporting.

Automatically includes records ready to be reported.



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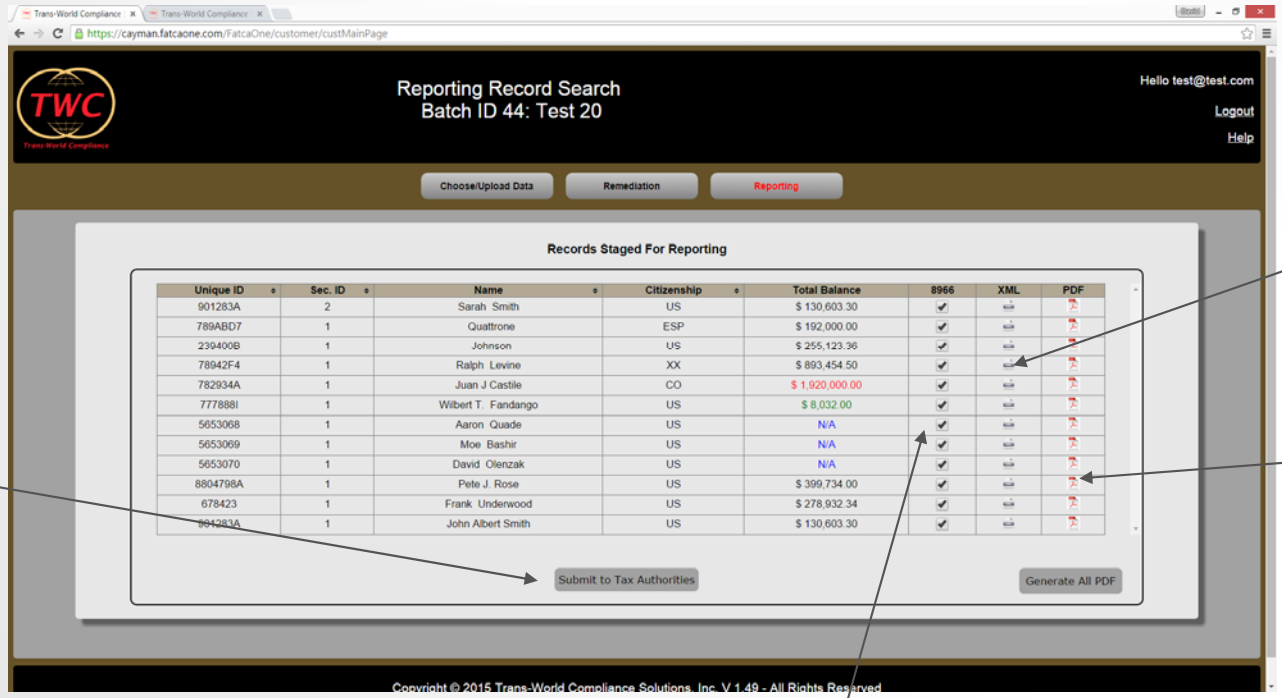
FATCA One IRS Dashboard



1 Click this to view the XML created.

2 Click this to review the FATCA form.

3 Click to submit data to the tax authorities.

Uncheck this to hold a record back from reporting.

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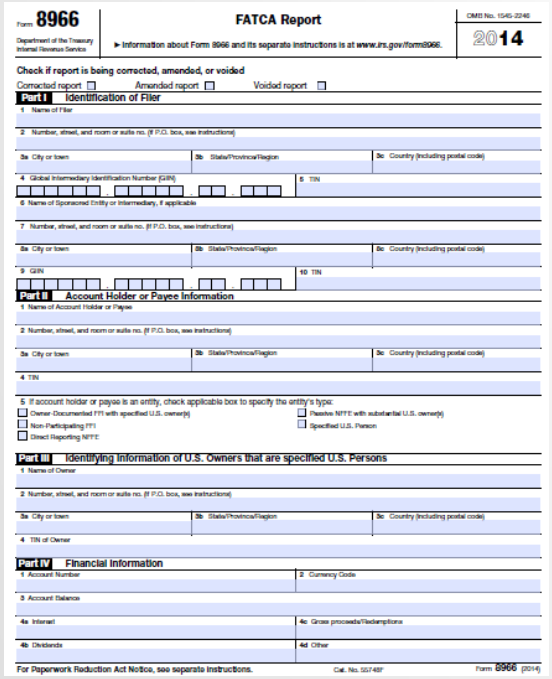
① VIEW THE XML CREATED



Form **8966** — **FATCA Report** — 2014

Department of the Treasury Internal Revenue Service — ► Information about Form 8966 and its separate instructions is at www.irs.gov/form8966.

Check if report is being corrected, amended, or voided

Corrected report ☐ Amended report ☐ Voided report ☐

Part I Identification of Filer

1 Name of Filer

2 Number, street, and room or suite no. (If P.O. box, see instructions)

3a City or town | 3b State/Province/Region | 3c Country (including postal code)

4 Global Intermediary Identification Number (GIIN) | 5 TIN

6 Name of Sponsored Entity or Intermediary, if applicable

7 Number, street, and room or suite no. (If P.O. box, see instructions)

8a City or town | 8b State/Province/Region | 8c Country (including postal code)

9 GIIN | 10 TIN

Part II Account Holder or Payee Information

1 Name of Account Holder or Payee

2 Number, street, and room or suite no. (If P.O. box, see instructions)

3a City or town | 3b State/Province/Region | 3c Country (including postal code)

4 TIN

5 If account holder or payee is an entity, check applicable box to specify the entity's type:

☐ Owner-Documented FFI with specified U.S. owner(s) ☐ Passive NFFE with substantial U.S. owner(s)

☐ Non-Participating FFI ☐ Specified U.S. Person

☐ Direct Reporting NFFE

Part III Identifying Information of U.S. Owners that are specified U.S. Persons

1 Name of Owner

2 Number, street, and room or suite no. (If P.O. box, see instructions)

3a City or town | 3b State/Province/Region | 3c Country (including postal code)

4 TIN of Owner

Part IV Financial Information

1 Account Number | 2 Currency Code

3 Account Balance

4a Interest | 4c Gross proceeds/Redemptions

4b Dividends | 4d Other

For Paperwork Reduction Act Notice, see separate instructions. Cat. No. 55748F Form **8966** (2014)

```
<?xml version="1.0" encoding="UTF-8" standalone="true"?>
- <ns2:FATCA_OECD xsi:schemaLocation="urn:oecd:ties:fatca:v1 FatcaXML_v1.1.xsd" version="1.1"
  xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xmlns:ns2="urn:oecd:ties:fatca:v1"
  xmlns="urn:oecd:ties:stffatcatypes:v1">
  - <ns2:MessageSpec>
      <SendingCompanyIN>C34VPZ.00000.SP.840</SendingCompanyIN>
      <TransmittingCountry>US</TransmittingCountry>
      <ReceivingCountry>US</ReceivingCountry>
      <MessageType>FATCA</MessageType>
      <Warning/>
      <MessageRefId>Test | Test Group | test@test.com | Test 7 | 2015-05-30 | 17:22:56</MessageRefId>
      <ReportingPeriod>2015-05-30</ReportingPeriod>
      <Timestamp>2015-05-30T17:22:56.708-04:00</Timestamp>
    </ns2:MessageSpec>
  - <ns2:FATCA>
    - <ns2:ReportingFI>
        <ResCountryCode>US</ResCountryCode>
        <TIN issuedBy="US">46-5297306</TIN>
        <Name>Transworld Compliance Inc.</Name>
      - <Address>
          <CountryCode>US</CountryCode>
          <AddressFree>2145 Wolftrap Court Vienna, VA 22182</AddressFree>
        </Address>
      - <ns2:DocSpec>
          <ns2:DocTypeIndic>FATCA11</ns2:DocTypeIndic>
          <ns2:DocRefId>test@test.com | 52 | 901283A | 2 | 2015-05-30 | 17:22:56</ns2:DocRefId>
        </ns2:DocSpec>
      </ns2:ReportingFI>
    - <ns2:ReportingGroup>
      - <ns2:AccountReport>
        - <ns2:DocSpec>
            <ns2:DocTypeIndic>FATCA11</ns2:DocTypeIndic>
            <ns2:DocRefId>test@test.com | 52 | 901283A | 1 | 2015-05-30 | 17:22:56</ns2:DocRefId>
          </ns2:DocSpec>
```

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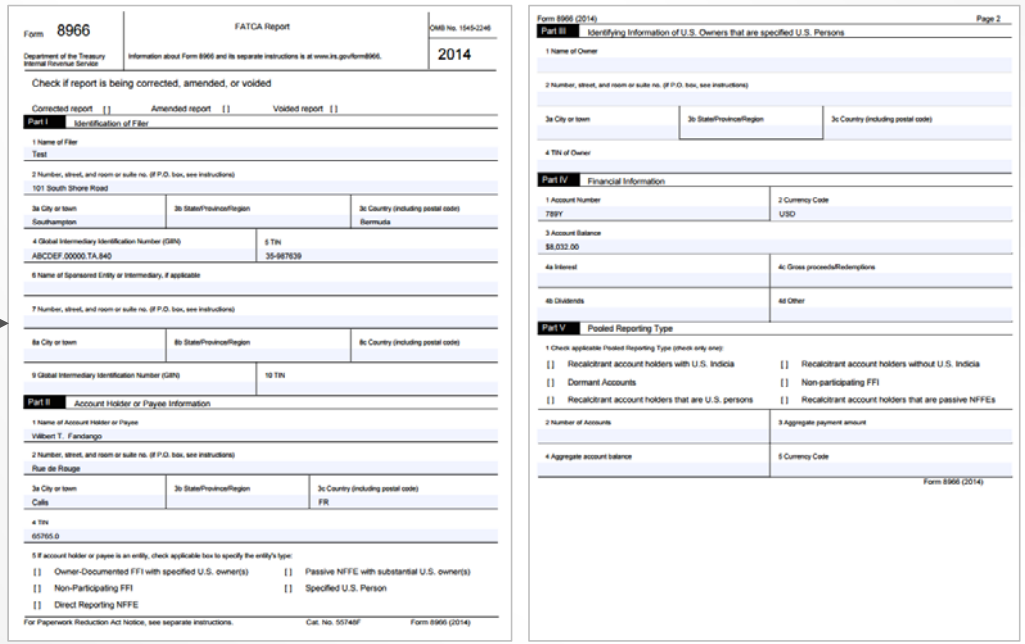
② PDF 8966 FATCA Form for Approval

PDF 8966 Representation of all the data. This may not be the form you submit, but is convenient to show all the data being submitted.

These can be saved on disk or printed for your records.



Form 8966 — FATCA Report — OMB No. 1545-2246 — 2014

Department of the Treasury Internal Revenue Service — Information about Form 8966 and its separate instructions is at www.irs.gov/form8966.

Check if report is being corrected, amended, or voided

Corrected report [ ] Amended report [ ] Voided report [ ]

Part I Identification of Filer

1 Name of Filer: Test

2 Number, street, and room or suite no. (if P.O. box, see instructions): 101 South Shore Road

3a City or town: Southampton | 3b State/Province/Region: | 3c Country (including postal code): Bermuda

4 Global Intermediary Identification Number (GIIN): ABCDEF.00000.TA.840 | 5 TIN: 36-987639

6 Name of Sponsored Entity or Intermediary, if applicable:

7 Number, street, and room or suite no. (if P.O. box, see instructions):

8a City or town: | 8b State/Province/Region: | 8c Country (including postal code):

9 Global Intermediary Identification Number (GIIN): | 10 TIN:

Part II Account Holder or Payee Information

1 Name of Account Holder or Payee: Wilbert T. Fandango

2 Number, street, and room or suite no. (if P.O. box, see instructions): Rue de Rouge

3a City or town: Calis | 3b State/Province/Region: | 3c Country (including postal code): FR

4 TIN: 65765.0

5 If account holder or payee is an entity, check applicable box to specify the entity's type:

[ ] Owner-Documented FFI with specified U.S. owner(s) [ ] Passive NFFE with substantial U.S. owner(s)

[ ] Non-Participating FFI [ ] Specified U.S. Person

[ ] Direct Reporting NFFE

For Paperwork Reduction Act Notice, see separate instructions. Cat. No. 55746F Form 8966 (2014)

Form 8966 (2014) Page 2

Part III Identifying Information of U.S. Owners that are specified U.S. Persons

1 Name of Owner:

2 Number, street, and room or suite no. (if P.O. box, see instructions):

3a City or town: | 3b State/Province/Region: | 3c Country (including postal code):

4 TIN of Owner:

Part IV Financial Information

1 Account Number: 789Y | 2 Currency Code: USD

3 Account Balance: $8,032.00

4a Interest: | 4c Gross proceeds/Redemptions:

4b Dividends: | 4d Other:

Part V Pooled Reporting Type

1 Check applicable Pooled Reporting Type (check only one):

[ ] Recalcitrant account holders with U.S. Indicia [ ] Recalcitrant account holders without U.S. Indicia

[ ] Dormant Accounts [ ] Non-participating FFI

[ ] Recalcitrant account holders that are U.S. persons [ ] Recalcitrant account holders that are passive NFFEs

2 Number of Accounts: | 3 Aggregate payment amount:

4 Aggregate account balance: | 5 Currency Code:

Form 8966 (2014)

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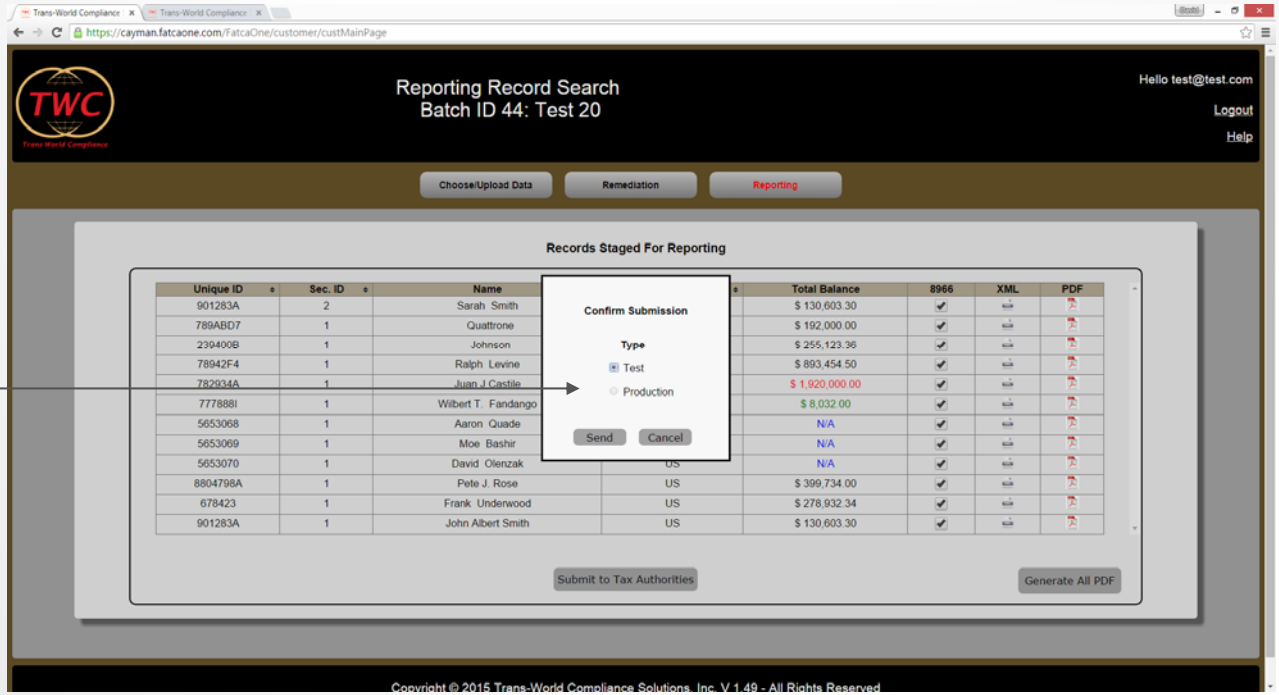
FATCA One IRS Dashboard

Test or Production: Allows testing of the process.



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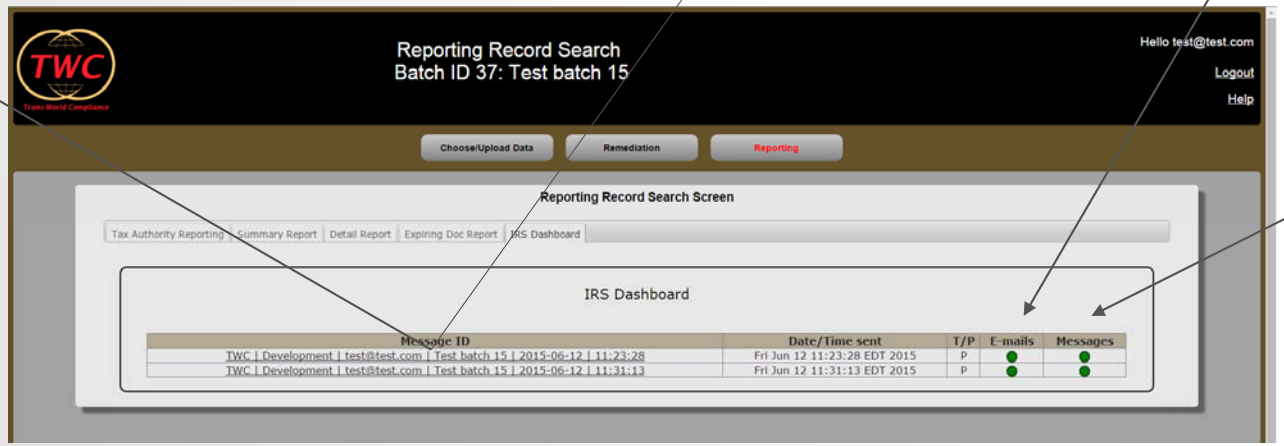
REPORTING IRS DASHBOARD

Shows records in the data batch submitted.

IDES System technical feedback.



ICMM freeform XML messages. You'll get an email to check the IRS dashboard when you get one of these.

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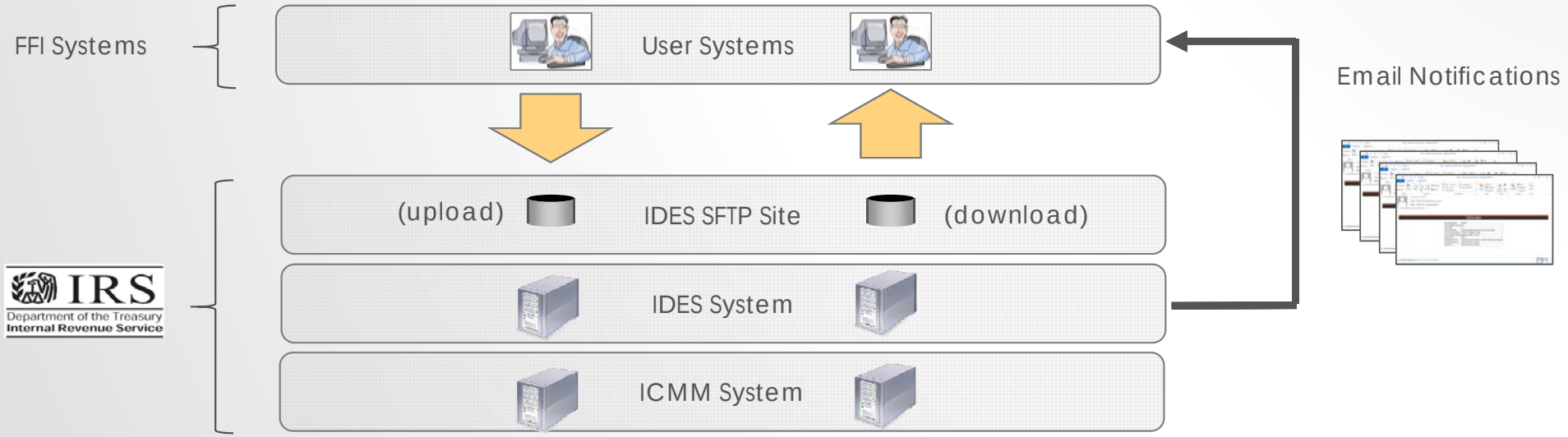
IRS WORKFLOW



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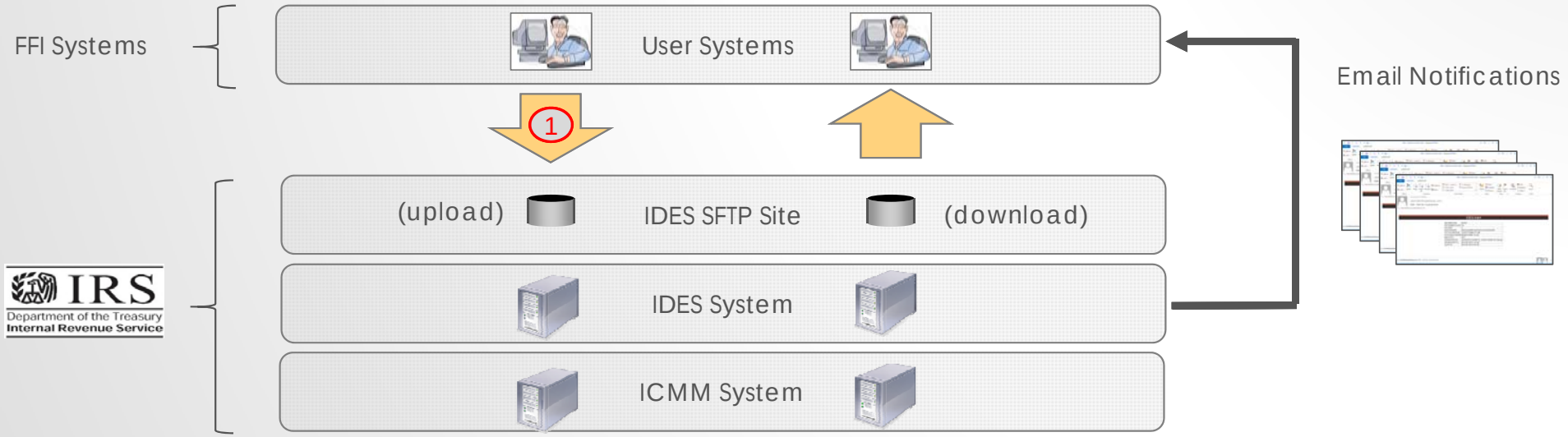
IRS WORKFLOW



1 **FFI uploads encrypted, enveloped, signed, XML data to IRS SFTP site.**

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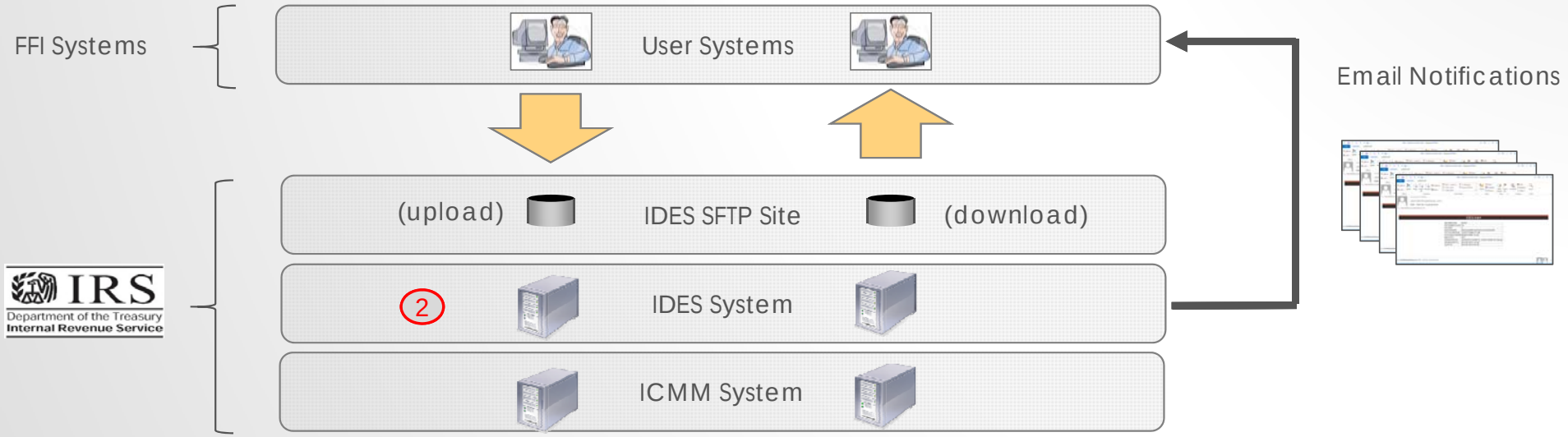
IRS WORKFLOW



2 **IDES System does a technical analysis of the data. Is it encrypted, enveloped, etc..?**

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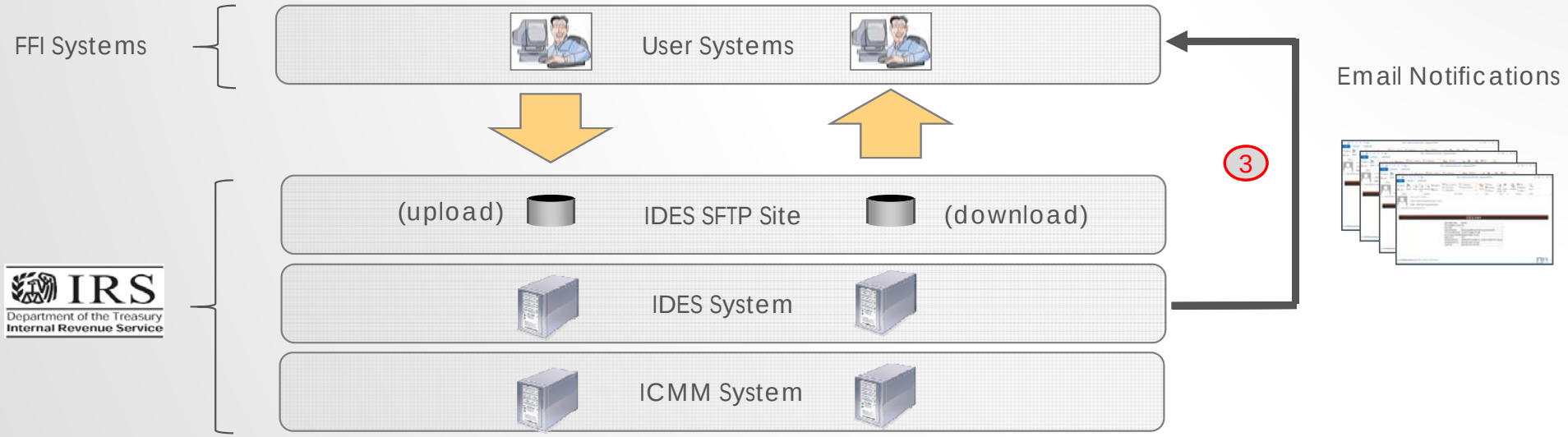
IRS WORKFLOW



3 **IDES sends an email with a code (error code or RC001 if everything is OK).**

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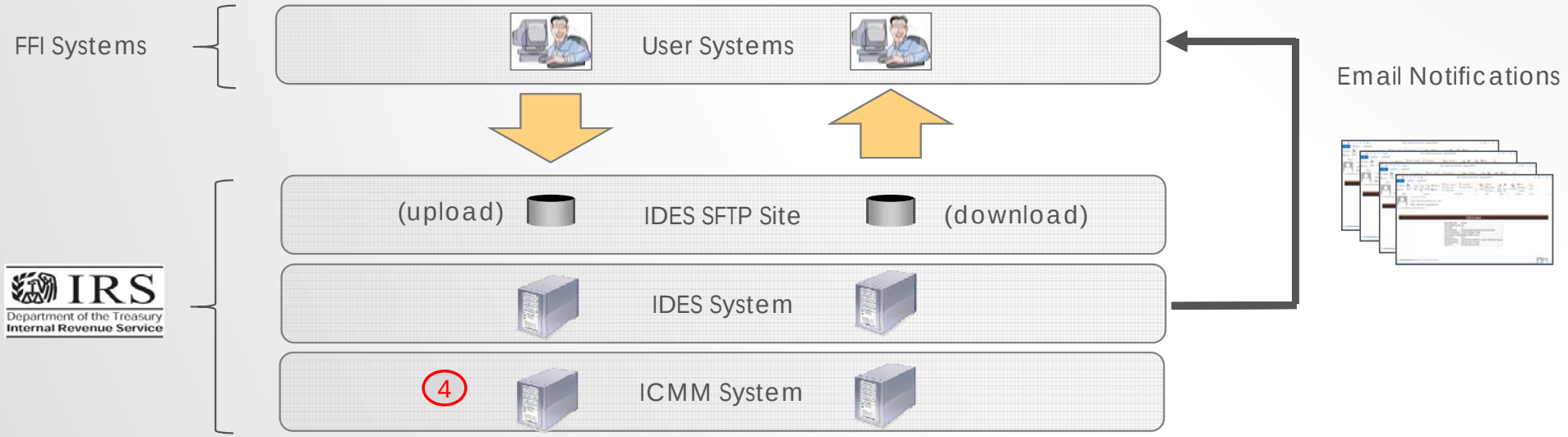
IRS WORKFLOW



4 **IDES passes the data on ICMM for further analysis.**

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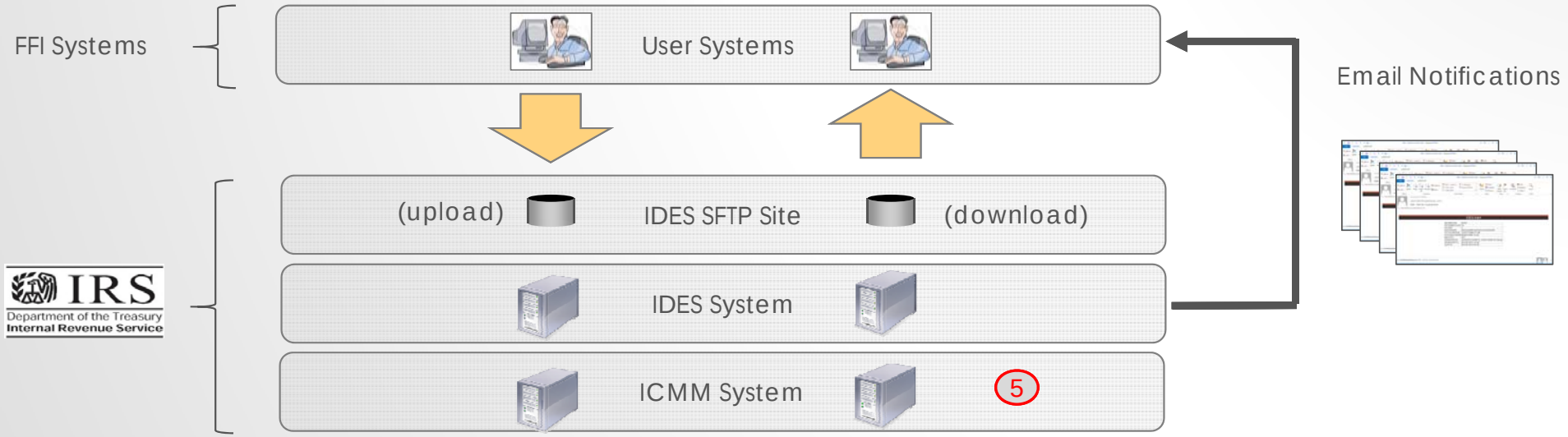
IRS WORKFLOW



5 **ICMM creates a XML message and places it on the SFTP download area**

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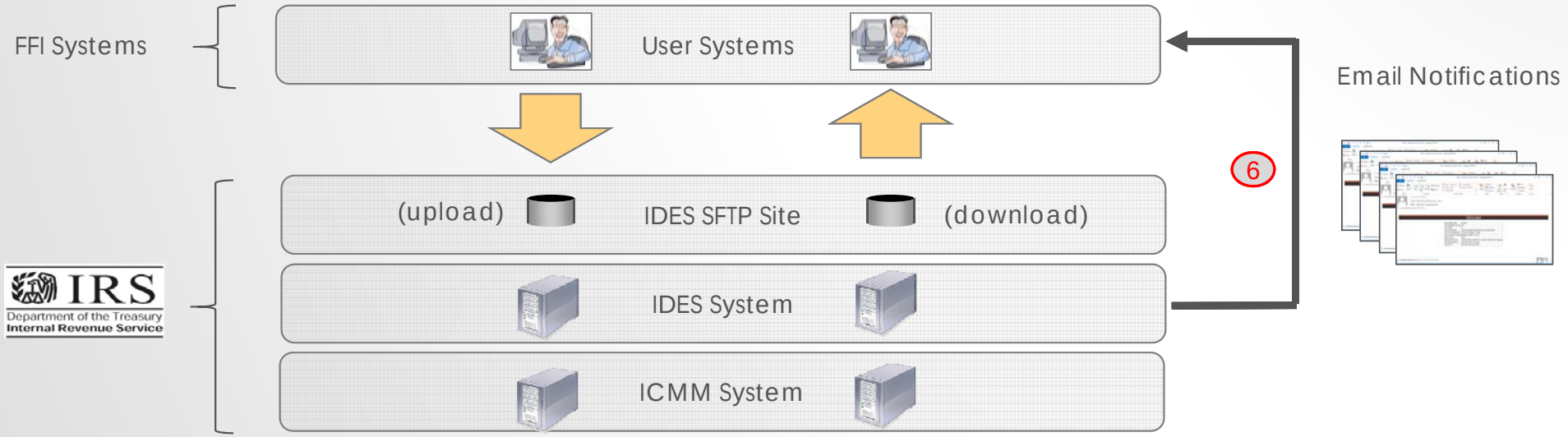
IRS WORKFLOW



6 **ICMM tells IDES to send the FFI user a email with a RC code that there is a file to be downloaded and decrypted.**

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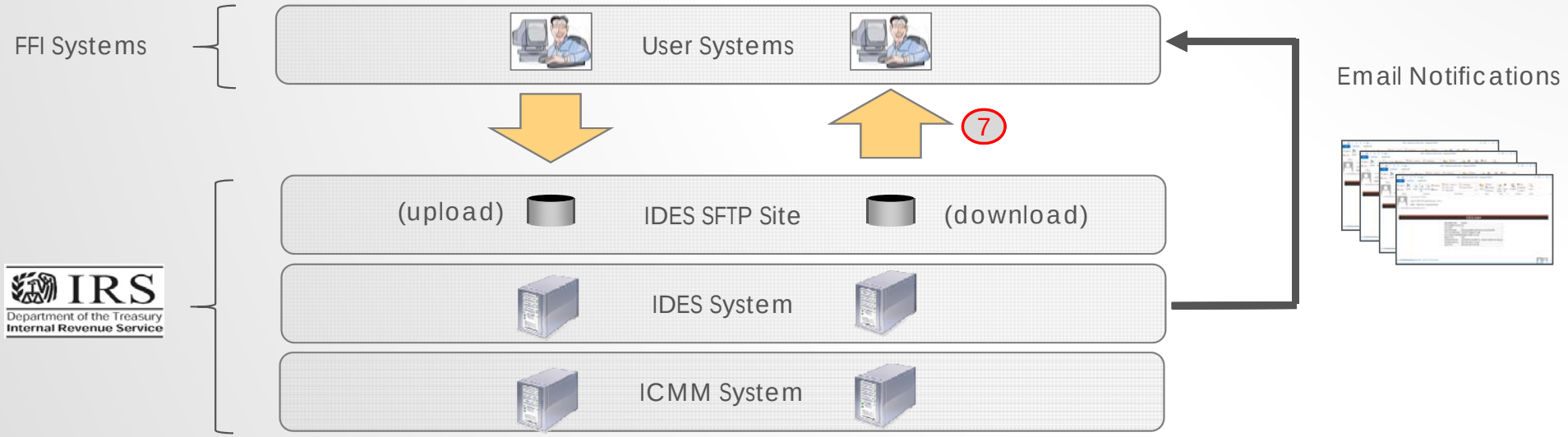
IRS WORKFLOW



7 **The user downloads the message, reverses the process of enveloping, decrypting, signing, etc… to decipher the message. Usually "success" but could be any free form correspondence.**

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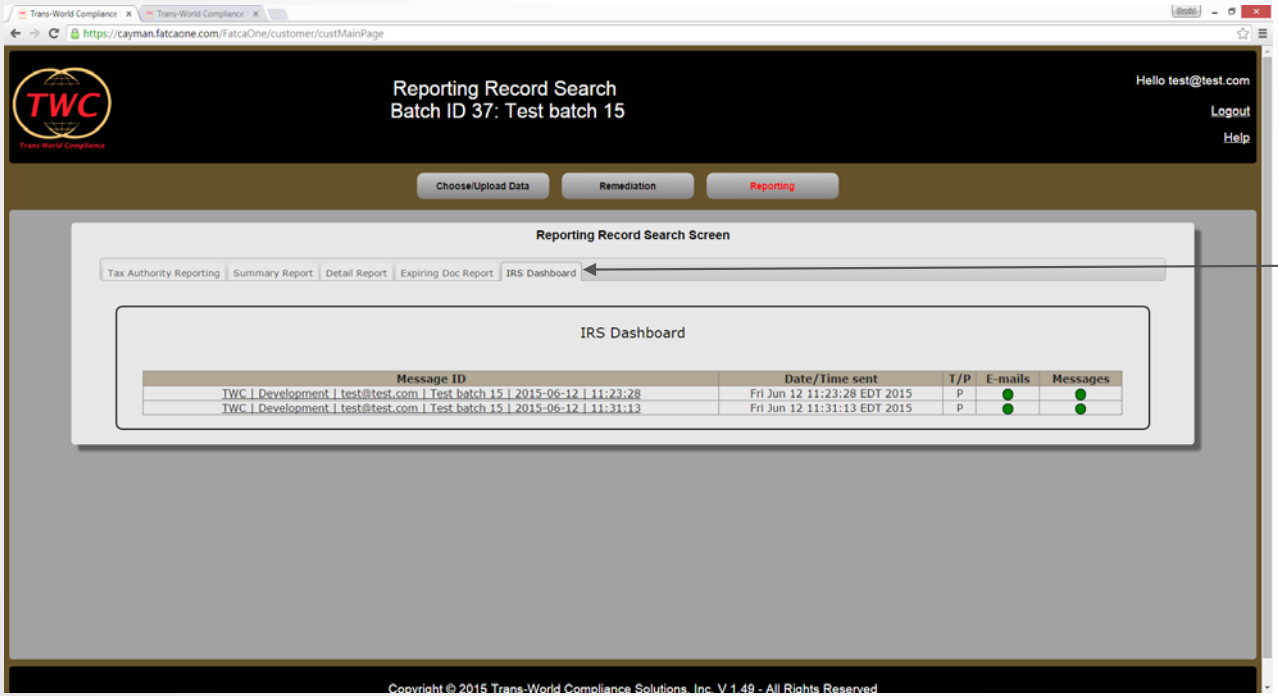
FATCA ONE IRS DASHBOARD



Within the Reporting Module, click IRS Dashboard to see all data batches submitted, see the details of those batches, and the status.

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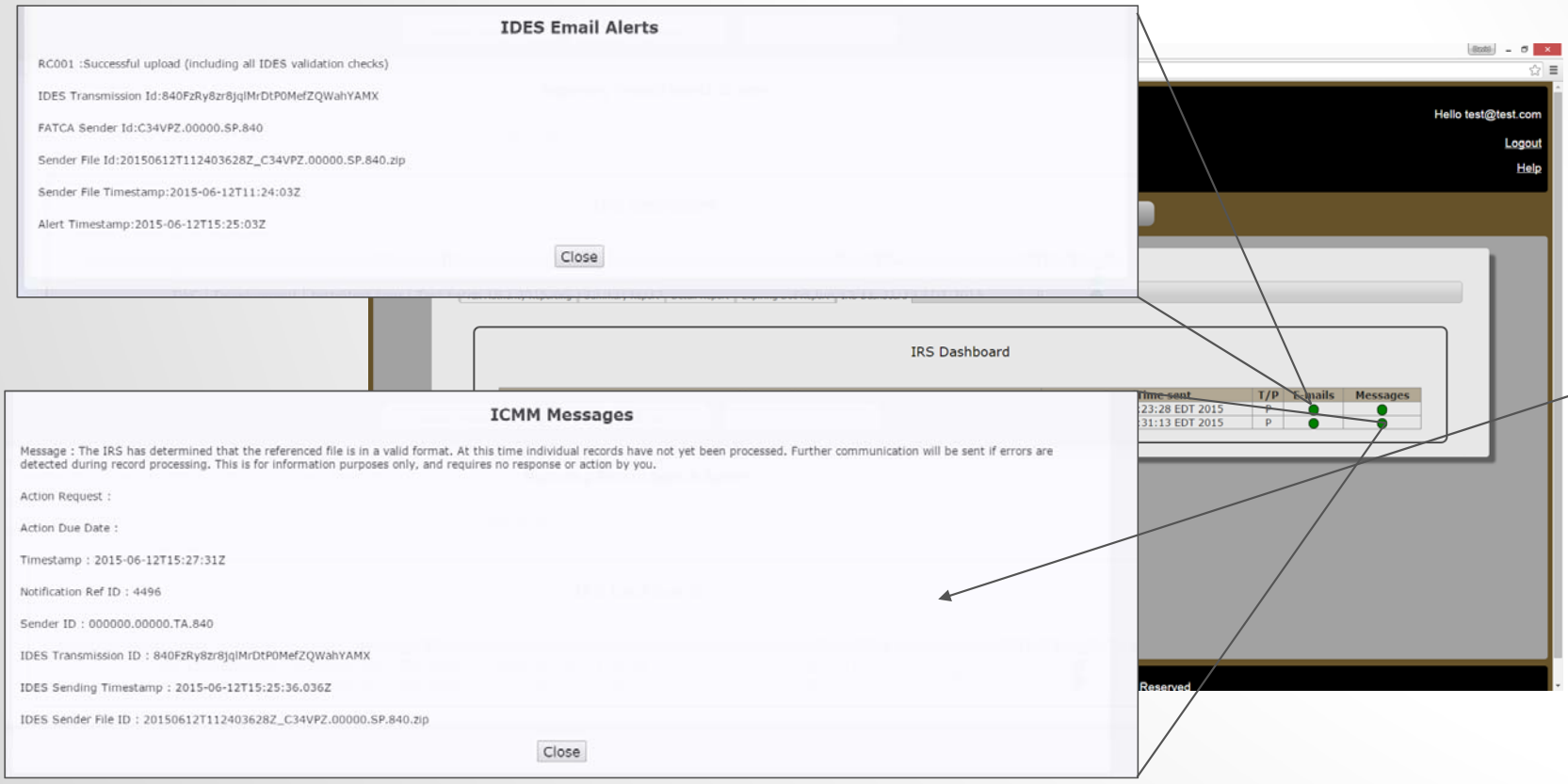
FATCA One IRS Dashboard



IRS messages can include any type of communication immediately after submission or at any time in the future.

You will get an email to check your IRS dashboard when there is a message waiting for you.

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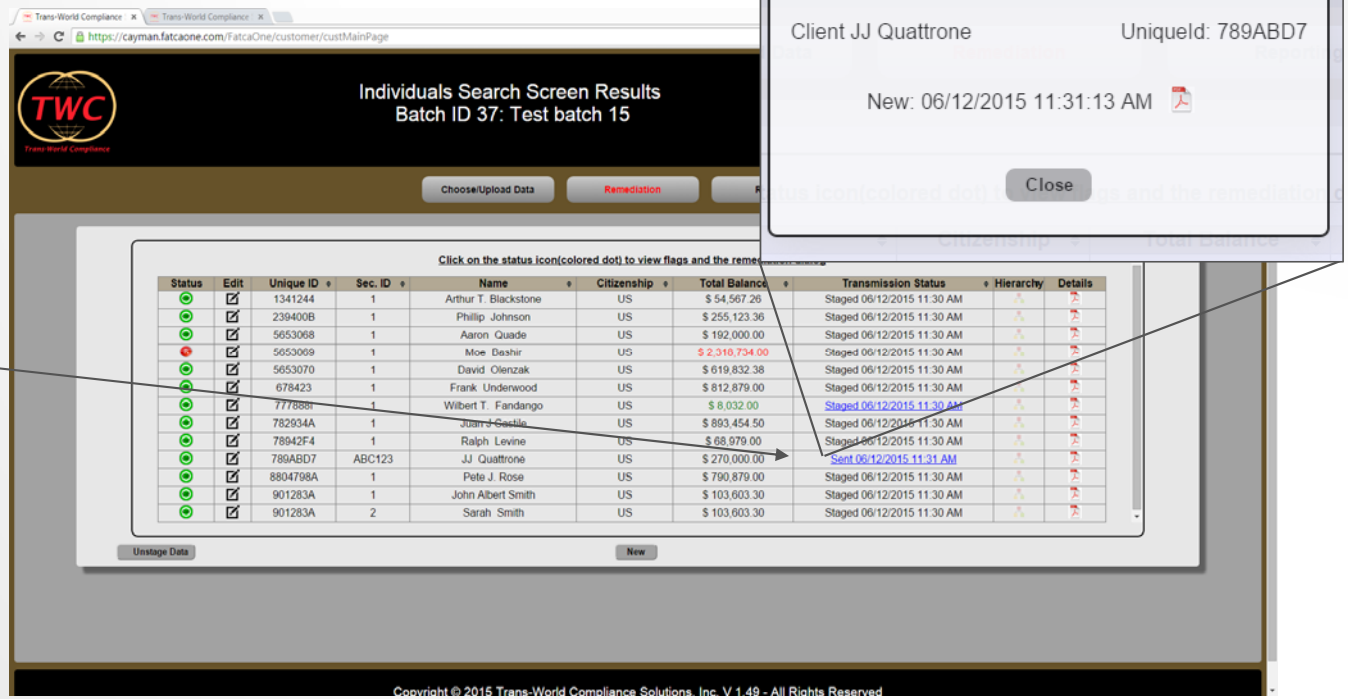
VIEWING PREVIOUSLY SUBMITTED RECORDS

Of course, you can always view any data submitted exactly as it was submitted to the tax authorities.

If the record was voided, amended, or corrected, all those records will show too.



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CONTACTING TRANS-WORLD COMPLIANCE

Q&A

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