

FATCA Online Registration Overview

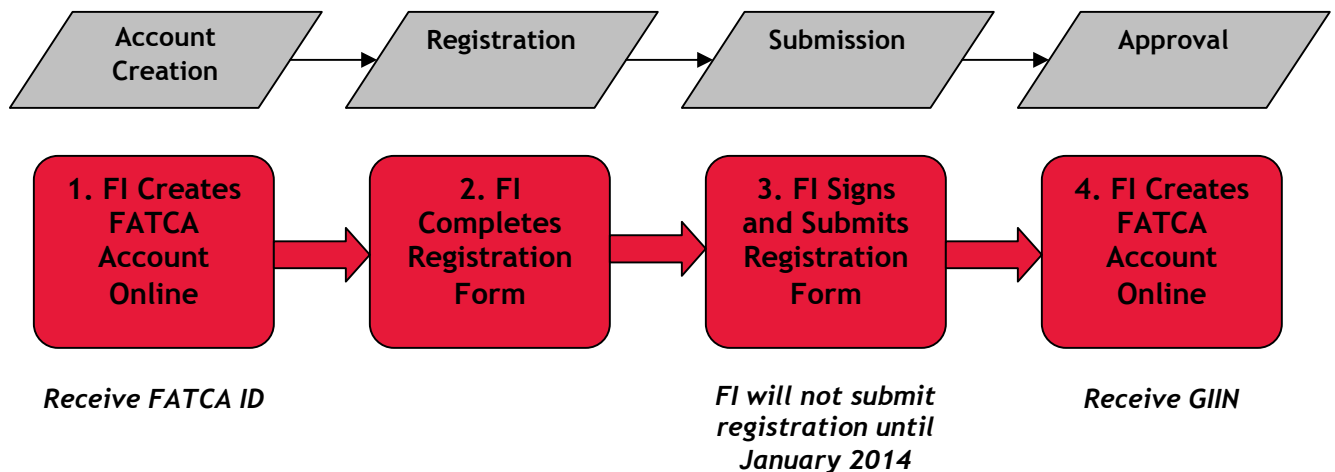
Introduction

In connection with its FATCA Registration, a Financial Institution will be issued a Global Intermediary Identification Number (GIIN) and will be identified on a published list available at www.irs.gov/fatca. The GIIN may be used by an FI to identify itself to withholding agents and to tax administrators for FATCA reporting.

The FATCA Registration is used by an FI to register itself (and its branches, if any) as a PFFI, a RDCFFI, a Limited FFI, a Limited Branch, or a Sponsoring Entity. It is also used by an FI to renew its Qualified Intermediary (QI), Withholding Foreign Partnership (WP), or Withholding Foreign Trust (WT) Agreement, if applicable. The first IRS FFI List will be posted electronically by June 2, 2014, and will be updated monthly thereafter.

Registration Process Overview

Online registration follows the process illustrated below:



Step 1: Create an Account

A Financial Institution using the online registration system will be able to create an online FATCA account for itself and for Member FIs of an Expanded Affiliated Group for which it is designated as the Lead FI.

- Each registering Financial Institution will receive a FATCA ID and will create its own access code to be used to log on to the Financial Institution’s online FATCA account. Branches of a Financial Institution will not have separate accounts, but will be assigned separate GIINs, if eligible.

A Financial Institution may register as a Single FI, Lead FI, Member FI or Sponsoring Entity:

- A Single FI is an FI that does not have any Member FIs and that is registering for PFFI or RDCFFI status for itself or one or more of its branches. A Single FI may also include a foreign branch of a USFI treated as a Reporting FI under a Model 1 IGA or that has in effect a QI Agreement.
- A Lead FI means a USFI, FFI, or a Compliance FI that will initiate the FATCA Registration process for each of its Member FIs that is a PFFI, RDCFFI, or Limited FFI and that is authorized to carry out most aspects of its Member FIs' FATCA Registrations. A Lead FI is not required to act as a Lead FI for all Member FIs within an EAG. Thus, an EAG may include more than one Lead FI that will carry out FATCA Registration for a group of its Member FIs. A Lead FI will be provided the rights to manage the online account for its Member FIs. NOTE: An FFI seeking to act as a Lead FI cannot have Limited FFI status in its country of residence.
- A Member FI is an FFI that is registering as a Member FI of an EAG that is not acting as a Lead FI and that is registering as a PFFI, RDCFFI, or Limited FFI. For purposes of registration, a Member FI may also include a foreign branch of a USFI that is treated as a Reporting FI under a Model 1 IGA, or that is renewing its QI Agreement. A Member FI will need to obtain its FATCA ID from its Lead FI. The FATCA ID is used to identify the Member FI for purposes of registration and is not the same number as the GIIN. A GIIN is issued to FIs, other than Limited FFIs or Limited Branches, after the FATCA Registration is submitted and approved.
- A Sponsoring Entity is an entity that will perform the due diligence, withholding, and reporting obligations of one or more sponsored investment entities or controlled foreign corporations (Sponsored FFIs).
- A USFI is a Financial Institution that is a resident of the United States.

Step 2: FI Completes the Registration Form

There are four parts to the FATCA Registration form. An FI will need to complete only the relevant parts of the form for the particular type of registration requested.

- Part 1 must be completed by all FIs to provide basic identifying information about each FI.
- Part 2 should be completed only by a Lead FI and must be completed via the FATCA Registration website. A Lead FI will identify in Part 2 each Member FI for which it is acting as a Lead FI and that is treated as a PFFI (including a Reporting FI under a Model 2 IGA), RDCFFI (including a Reporting FI under a Model 1 IGA), or Limited FFI.

Additionally, for purposes of registration, a Member FI may include a foreign branch of a USFI that is registering to obtain a GIIN or to renew its QI Agreement. FATCA Online Registration User Guide 11

- Part 3 should be completed only by an FI, including a foreign branch of a USFI, currently acting as a QI, WP, or WT and that wishes to renew its agreement NOTE: Part 3 should be completed only by an FI currently acting as a QI, WP, or WT and currently using an issued Employer Identification Number (EIN) to establish its applicable status. An FI that would like to apply to become a first-time QI, WP, or WT cannot do so using the paper Form 8957 or the FATCA Registration website. Instead, the FI must complete Form 14345 in accordance with its instructions. It is advisable, but not required, for an FI applying for first-time QI, WP, or WT status to do so before it submits its FATCA Registration form. For more information about QI, WP, or WT Agreements, go to www.irs.gov/fatca
- Part 4 must be completed by all FIs and requires an FI to certify that the information provided in the FATCA Registration form is accurate and complete and to agree or confirm that it will comply with its FATCA obligations, if applicable, in accordance with the status or statuses for which it has registered itself or any of its branches. An FI, including a Reporting FI under a Model 1 or 2 IGA, that is registering to renew its QI, WP, or WT Agreement will be agreeing to the terms of such renewed 2014 Model QI, WP, or WT Agreement.
- Reporting FIs under a Model 1 or 2 IGA: Most Reporting FIs under a Model 1 IGA are registering only to obtain a GIIN and to authorize one or more POCs to receive information related to FATCA Registration on behalf of the FI. Most Reporting FIs under a Model 2 IGA are registering only to obtain a GIIN, authorize one or more POCs to receive information related to FATCA Registration on behalf of the FI, and to confirm that they will comply with the terms of an FFI Agreement as modified by the applicable Model 2 IGA.
- A Reporting FI operating one or more branches not in an IGA jurisdiction is also agreeing to the terms of an FFI Agreement for any such branch, unless the branch is treated as a Limited Branch. Additionally, a Reporting FI requesting renewal of a QI, WP or WT Agreement is agreeing to the terms applicable to such renewed 2014 Model QI, WP, or WT Agreements.

A Financial Institution's classification as a Single FI, Lead FI, Member FI, or Sponsoring Entity will determine which registration questions it must answer. For example, Lead FIs will be prompted to provide information about Member FIs of its Expanded Affiliated Group.

The table below summarizes the key steps for each type of FI:

<u>Single FI</u>	<u>Lead FI</u>	<u>Member FI</u>	<u>Sponsoring Entity</u>
<p>1. Create an account. Choose an Access Code and the system will assign a FATCA ID. Record FATCA ID and Access Code for future use.</p> <p>2. Complete Part 1 of this online FATCA Registration form (Form 8957).</p> <p>3. Complete Part 3 if you have a Qualified Intermediary, Withholding Foreign Partnership, or Withholding Foreign Trust agreement in effect and wish to renew that agreement.</p> <p>4. On or after January 1, 2014, electronically sign and submit your registration form.</p> <p>5. Wait for registration to be processed.</p> <p>6. Upon approval, the FI will receive notification. GIINs will be assigned to the FI and any branches that are not limited. Assigned GIINs will be included in the next published IRS FFI list.</p>	<p>1. Create an account. Choose an Access Code and the system will assign a FATCA ID. Record FATCA ID and Access Code for future use.</p> <p>2. Complete Part 1 of this online FATCA Registration form (Form 8957).</p> <p>3. Complete Part 2 of this online FATCA Registration form.</p> <p>4. Complete Part 3 if you have a Qualified Intermediary, Withholding Foreign Partnership, or Withholding Foreign Trust agreement in effect and wish to renew that agreement.</p> <p>5. On or after January 1, 2014, electronically sign and submit your registration form.</p> <p>6. Give your Member FIs their FATCA login information.</p> <p>7. Wait for registration to be processed.</p> <p>8. Upon approval, the Lead FI will receive notification. GIINs will be assigned to the FI and any of its branches that are not Limited Branches. Assigned GIINs will be included in the next published IRS FFI list.</p>	<p>1. Enter online system with the FATCA ID and Temporary Access Code given to you by your Lead FI. Create a new Access Code. Record FATCA ID and Access Code for future use.</p> <p>2. Complete Part 1 of this online FATCA Registration form (Form 8957).</p> <p>3. Complete Part 3 if you have a Qualified Intermediary, Withholding Foreign Partnership, or Withholding Foreign Trust agreement in effect and wish to renew that agreement.</p> <p>4. On or after January 1, 2014, electronically sign and submit your registration form.</p> <p>5. Wait for registration to be processed.</p> <p>6. Upon approval, the Member FI will receive notification. GIINs will be assigned to the FI and any of its branches that are not Limited Branches. Assigned GIINs will be included in the next published IRS FFI list.</p>	<p>1. Create an account. Choose an Access Code and the system will assign a FATCA ID. Record FATCA ID and Access Code for future use.</p> <p>2. Complete the relevant questions in Part 1 of this online FATCA Registration form (Form 8957). While completing the FATCA Registration, select “None of the Above” for Question 4, “Not applicable” for Question 6, and “No” for Question 7; you’ll then skip to Question 10. Do not complete Part 3.</p> <p>3. On or after January 1, 2014, electronically sign and submit your registration form.</p> <p>4. Wait for registration to be processed.</p> <p>5. Upon approval, the Sponsoring Entity will receive notification and a GIIN will be assigned to the FI as a Sponsoring Entity. The assigned GIIN will be included in the next published IRS FFI list. Information on registration of Sponsored Entities will be provided on the FATCA website.</p>

Steps 3 and 4: Submission and Approval

The Responsible Officer (RO) will not be able to submit the completed registration form on behalf of the Financial Institution until on or after January 1, 2014, although information can be entered in the FI's account before then.

For the period from the opening of the FATCA Registration website through December 31, 2013, an FI will be able to access its online account to modify or add registration information, including its appropriate registration status as such status is established or FATCA Online Registration User Guide 13 modified, for example, by the signing of an Intergovernmental Agreement (IGA). Prior to January 1, 2014, however, any information entered into the system, even if submitted as final by the website user, will not be regarded as a final submission, but will merely be stored until the information is submitted as final on or after January 1, 2014. Thus, FIs can use the remainder of 2013 to become familiar with the FATCA Registration website, to input preliminary information, and to refine that information. On or after January 1, 2014, each FI will be expected to finalize its registration information by logging into its online account on the FATCA Registration website, making any necessary additional changes, and submitting the information as final.

Global Intermediary Identification Number

GIINs: As registrations are finalized and approved in 2014, registering FIs will receive a notice of registration acceptance and will be issued a GIIN. The IRS will electronically post the first IRS FFI List by June 2, 2014, and will update the list on a monthly basis thereafter. To ensure inclusion in the June 2014 IRS FFI List, an FI will need to finalize its registration by April 25, 2014.

After an FI has been approved, it is assigned a unique GIIN, which the FI will provide to withholding agents in connection with establishing its FATCA compliance. GIINs are alphanumeric, comprised of 19 characters, and are in the following format:
XXXXXX.XXXXX.XX.XXX.