The Bahamas Competent Authority AEOI Portal
USER GUIDE

Version 2.0

***Date issued*: April 2026**

Table of Contents

Glossary

Term	Description
CRS	The OECD’s Common Reporting Standard, as implemented in Bahamas by the CRS Regulations
CRS Regulations	Bahamas Automatic Exchange of Financial Account Information Regulations, 2017
CRS Guidance	Bahamas’s Guidance Notes on the Common Reporting Standard for Automatic Exchange of Financial Account Information in Tax Matters
CTS	The OECD’s Common Transmission System, which will be used to exchange filings with partner jurisdictions
FATCA	Foreign Account Tax Compliance Act
FI	Bahamas Financial Institution
GIIN	Global Intermediary Identification Number issued by the IRS for US FATCA purposes
IRS	United States Internal Revenue Service
Ministry	Bahamas Competent Authority, Compliance Commission
OECD	Organization for Economic Cooperation and Development
Primary User	The portal user that has been designated as the Principal Point of Contact for compliance with the CRS Regulations and/or FATCA Regulations
Reporting FI	Bahamas Reporting Financial Institution
Tax Authority	Bahamas Competent Authority
TIN	Taxpayer Identification Number

1 Introduction

1.1 Purpose

The purpose of this document is to provide an overview of the most commonly used functionality in **The Bahamas Competent Authority AEOI Portal** with respect to Financial Institutions meeting their reporting obligations under the OECD Common Reporting Standard (CRS) and the IRS Foreign Account Tax Compliance Act (FATCA). This document is not intended to provide business, legal, policy, or regulatory guidance to Financial Institutions.

1.2 Scope

The scope of this document includes enrolment and reporting for both CRS and FATCA.

The 'how-to' guidance in this document is not intended to cover the full range of screens and functionality within **The Bahamas Competent Authority AEOI Portal**, but it should provide a high-level overview of the most commonly used functions that Financial Institutions should expect to use as part of their normal enrolment and filing submission procedures.

1.3 Support and resources

Bahamas Government Resources:

Please refer to the below documents published by the Bahamas Government for more information and regulatory assistance:

- Portal Enrolment Form
- Portal Login Page
- Guidance Notes
- Competent Authority

OECD Resources:

Please refer to the below documents published by the OECD for further guidance. The OECD has also developed a comprehensive Automatic Exchange Portal that is the principal source for these and other CRS materials and resources.

- OECD CRS Standard for Automatic Exchange of Financial Account Information in Tax Matters (Second Edition): Contains the due diligence and reporting rules for Financial Institutions along with Commentary that assists with interpretation of these rules.
- OECD CRS Implementation Handbook: Provides practical guidance to assist government officials and financial institutions in the implementation of the CRS.
- OECD CRS-related FAQs: Provides a list of common questions on the application of the CRS and responses from the OECD.
- OECD CRS XML Schema and User Guide: Provides a link to the OECD CRS XML Schema that all CRS XML filings must comply with, as well as the user guide which explains the required information and additional business rules applied by the OECD.
- Common Reporting Standard Status Message XML Schema User Guide: provides guidance on the status message responses sent back from partner jurisdictions
- Guidance on the Implementation of Country-by-Country Reporting: Provides additional implementation guidance regarding country-by-country reporting.

IRS Resources:

Please refer to the below documents and information published by the United States Internal Revenue Service (IRS) for further guidance regarding US FATCA reporting.

- FATCA FAQs: Provides a list of common questions on the application of the FATCA and responses from the IRS, including the following topics: General, IRS Registration System, FFI List, IDES, and ICMM.
- FATCA XML Schema, User Guide, and Sample Files: Provides a link to the FATCA XML Schema v2.0 that all FATCA XML filings must comply with, as well as the user guide which explains the required information and additional business rules applied by the IRS.

2 Enrolment

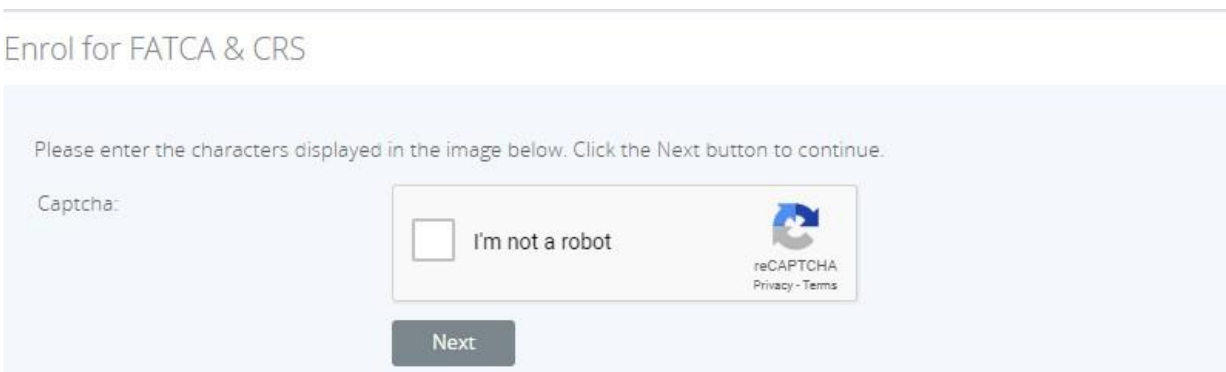
In order to enrol with the Bahamas Competent Authority, as a Financial Institution under CRS and/or FATCA, entities must complete **The Bahamas Competent Authority AEOI Portal** enrolment form.

NOTE: If you have over one hundred entities to enrol please contact the Competent Authority at information@taxreporting.finance.gov.bs

2.1 Accessing the enrolment form

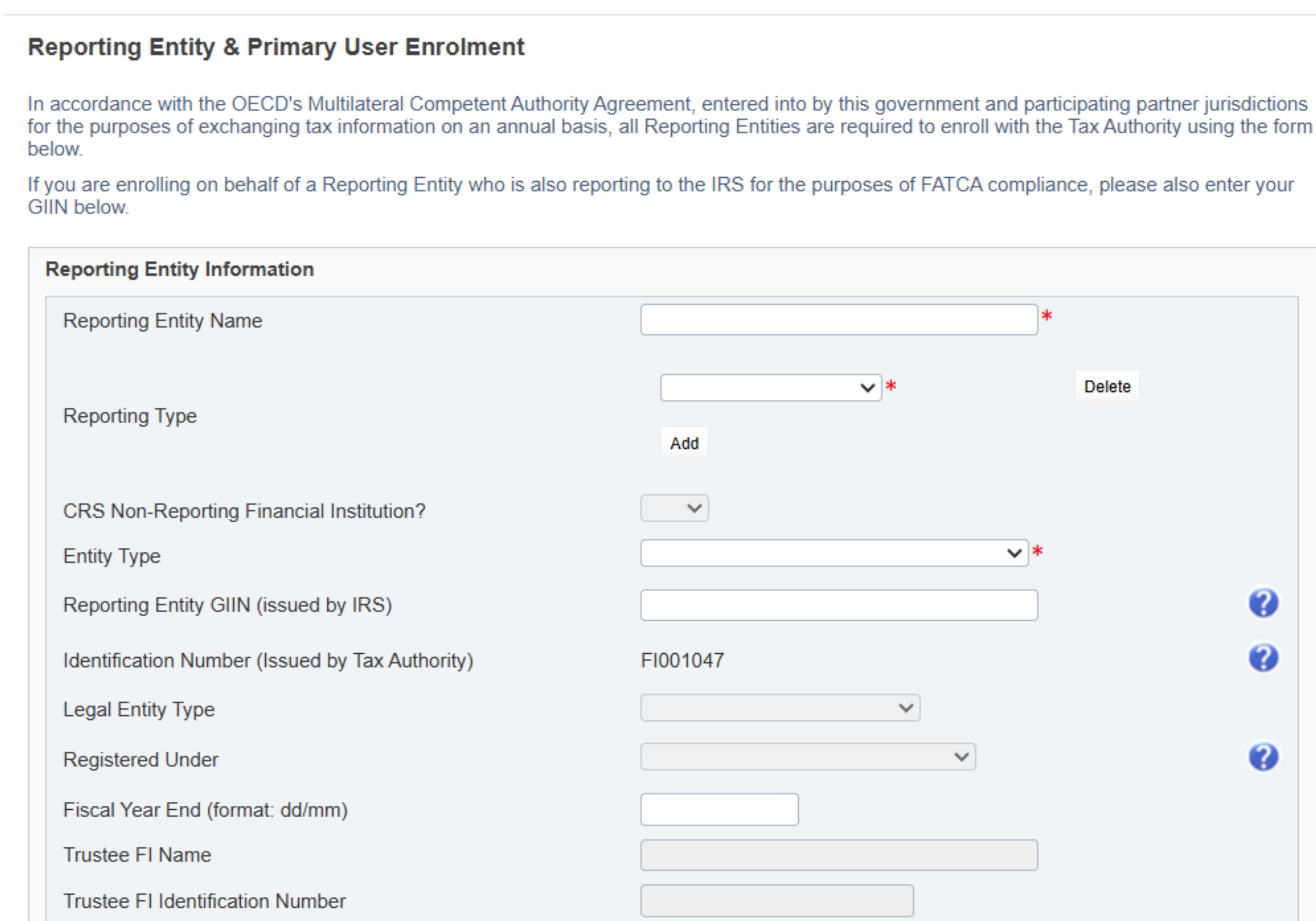
1. Follow this link to access **The Bahamas Competent Authority AEOI Portal** enrolment form. You will be presented with a security image similar to the one shown in the image below.

2. Solve the Captcha challenge and select "Next".



2.2 Completing the enrolment form

You will be presented with the **Reporting Entity & Primary User Enrolment** page.



1. Complete the input fields in the **Reporting Entity Information** section as applicable for your entity and reporting type. Please note the following:

   - The **Reporting Entity Name** should be the legal name of the Financial Institution.

     i. If the enrolment and reporting is being done by a third-party service provider, this name is still required to be that of the Reporting Entity (not the service provider).

   - The **Entity Type** should be aligned to your CRS entity classification. If enrolling for FATCA only, you should select "Other" as your entity type.

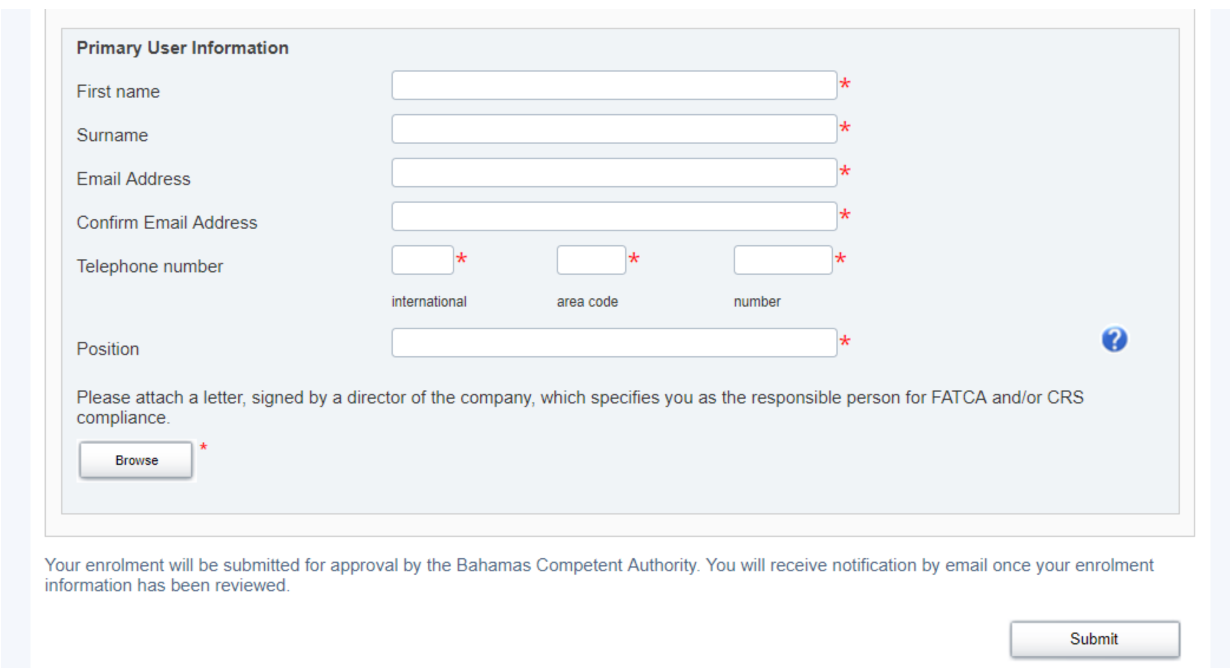
   - The **Reporting Type** should describe the reporting regime(s) you are required to report under. The options are "CRS", "FATCA", or "CRS & FATCA".

   - The **Reporting Entity GIIN** is only required to be provided if the entity has already enrolled with the IRS for FATCA reporting processes. Otherwise it can be left blank.

   - The **Identification Number** is automatically assigned

   - **Fiscal Year End** is the fiscal year end of the financial institution.

   - The **Registered Office Address** should be completed with the registered address of the Financial Institution (not the third-party service provider, if applicable). Street Address, City, and Country are mandatory.



2. Complete the input fields in the **Primary User Information** section. Please note the following:

   - The Primary User may represent a third-party service provider for the entity.

   - The **Email Address** provided will be where the account activation information will be sent once the enrolment is approved, and will be the user's username for logging into the system.

   - Note: You must enter the same email in the **Confirm Email Address** field otherwise you will not be able to submit your enrolment

3. Upload a scan of a signed letter using the **Browse** button. The letter should be signed by a Director or Officer of the Financial Institution, and should specify the Primary User as responsible for CRS and/or FATCA compliance.

4. When the documents have completed upload, select the **Submit** button.

This section is intended to act as a supplementary user guide for the Financial Institutions (FIs) who wish to enrol on '*The Bahamas Competent Authority AEOI Portal'* as a '**Trustee Documented Trusts (TDT)**' .

1. Completing an Enrolment

1.1 Completing an Enrolment as a Financial Institution

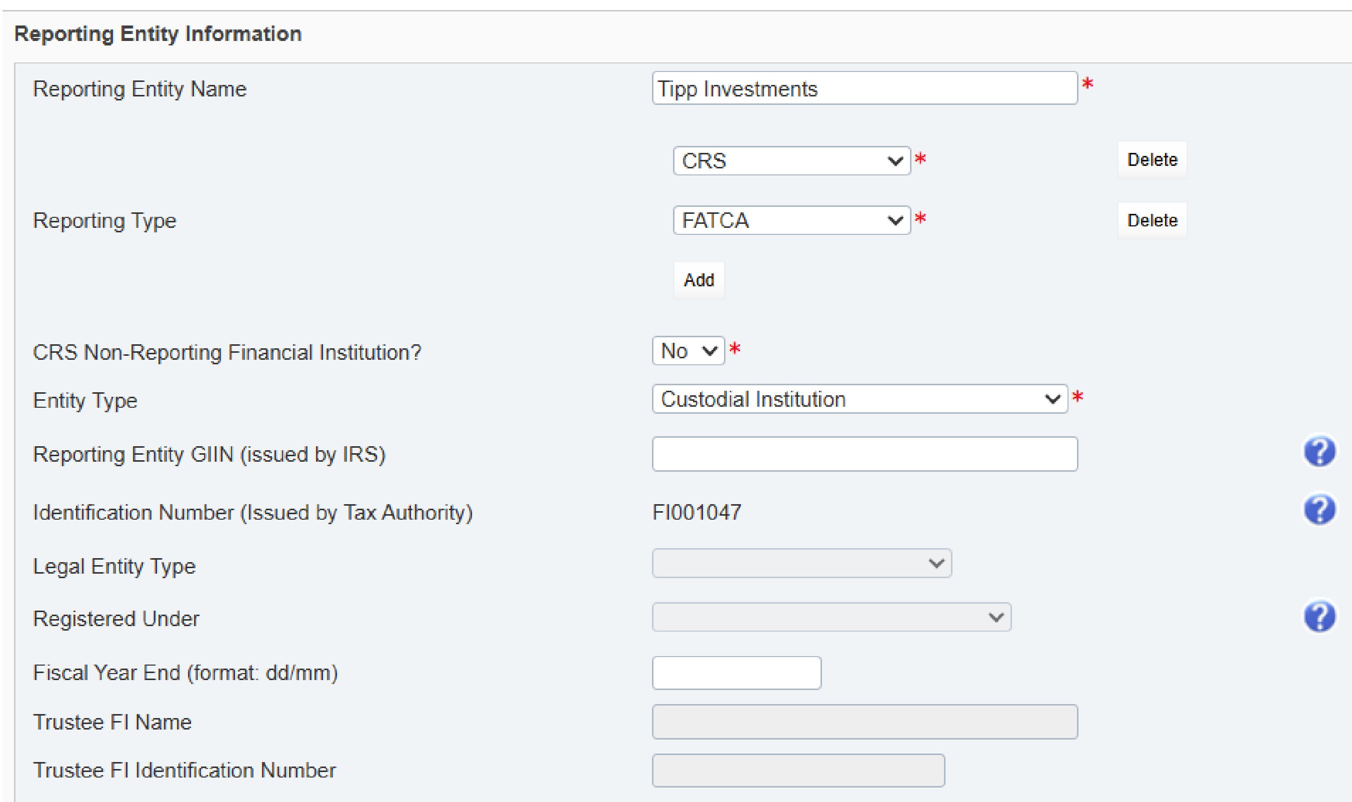
All Financial Institutions are required to complete an Enrolment form before accessing '*The Bahamas Competent Authority AEOI Portal'*.

Links to the enrolment page will be accessible via the he Bahamas Competent Authority website.

After accessing the enrolment form. The FI must complete all mandatory fields on the enrolment form, which includes **two** sections:

1. Financial Institution Information
2. Primary User Information

All Financial Institutions will have already obtained a GIIN (Global Intermediary Identification Number) which is issued by the IRS. **Note:** The Fields 'Trustee FI Name' and 'Trustee FI Identification Number' will remain disabled, unless the Registering user selects 'Trustee Documented Trust **'**option, this will be covered in section 1.2 of this user guide. These fields are not required when enrolling as a standard FI.


Reporting Entity Information

Reporting Entity Name	Tipp Investments *	
Reporting Type	CRS *	Delete
	FATCA *	Delete
	Add	
CRS Non-Reporting Financial Institution?	No *	
Entity Type	Custodial Institution *	
Reporting Entity GIIN (issued by IRS)		
Identification Number (Issued by Tax Authority)	FI001047	
Legal Entity Type		
Registered Under		
Fiscal Year End (format: dd/mm)		
Trustee FI Name		
Trustee FI Identification Number		

Enrolment Requirements Include: All fields with red asterixis are **Mandatory**.

<u>**Primary User Information**</u>

- First name
- Surname
- Email Address
- Telephone number
- Letter from Director of FI

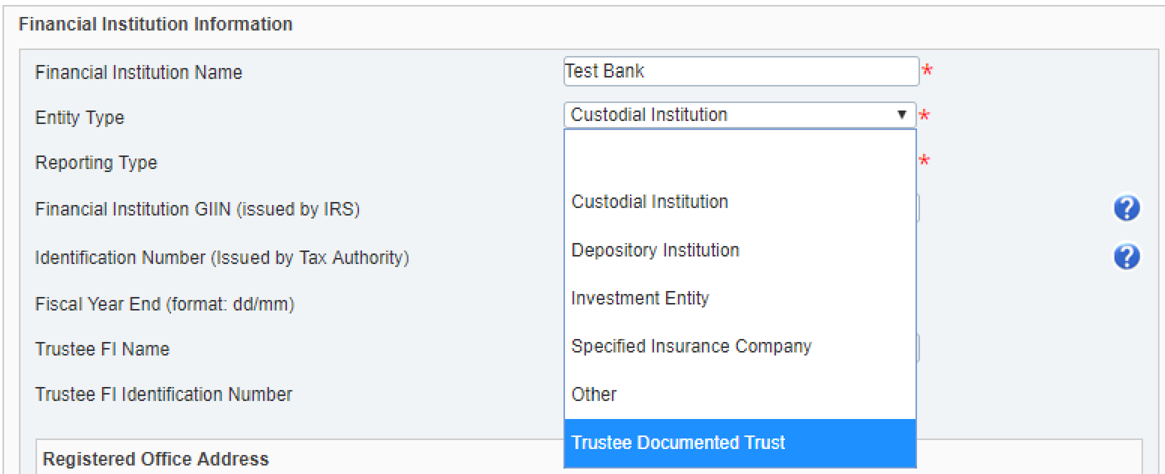
1.2 Enrolling as a Trustee Documented Trusts (TDT)

If a Financial Institution wishes to register with 'The Bahamas Competent Authority AEOI Portal as a 'Trustee Documented Trusts (TDT)', then the following pre-requisites are required:

- To enrol as a Trustee, the Entity must <u>**have already have been enrolled in the System as an FI.**</u>

For Financial Institutions to enrol as a Trustee Documented Trusts (TDTs) the following steps need to be taken (Provided the pre-requisite outlined above has been met) when completing the Enrolment form:

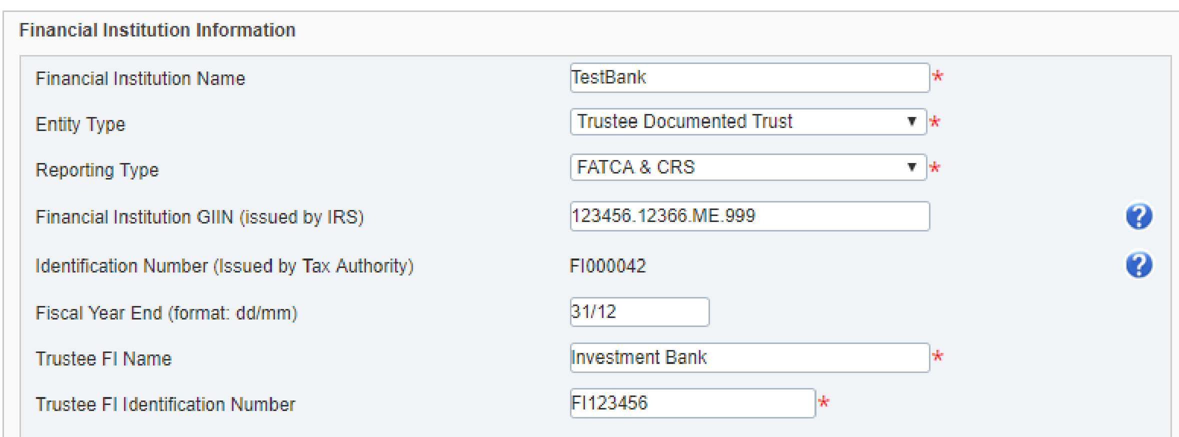
When completing the 'Financial Institution Information', when the user reaches the 'Entity Type' section, click on the drop-down section and select the 'Trustee Documented Trust 'option.



Once selected, complete the rest of the required fields as normal. The following fields should now be activated:

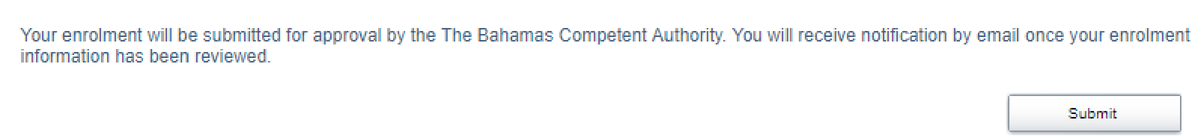
1. **Trustee FI Name**
2. **Trustee FI Identification Number (As the FI is already in the system, this information is available in the 'Financial Institution section')**

Fill out the required information, then complete the rest of the Enrolment Form as normal.



1.2 Submitting a Completed Enrolment Form

Once all required information has been accurately completed, users can use the submission button to submit their completed enrolment form for approval with the Tax Authority.

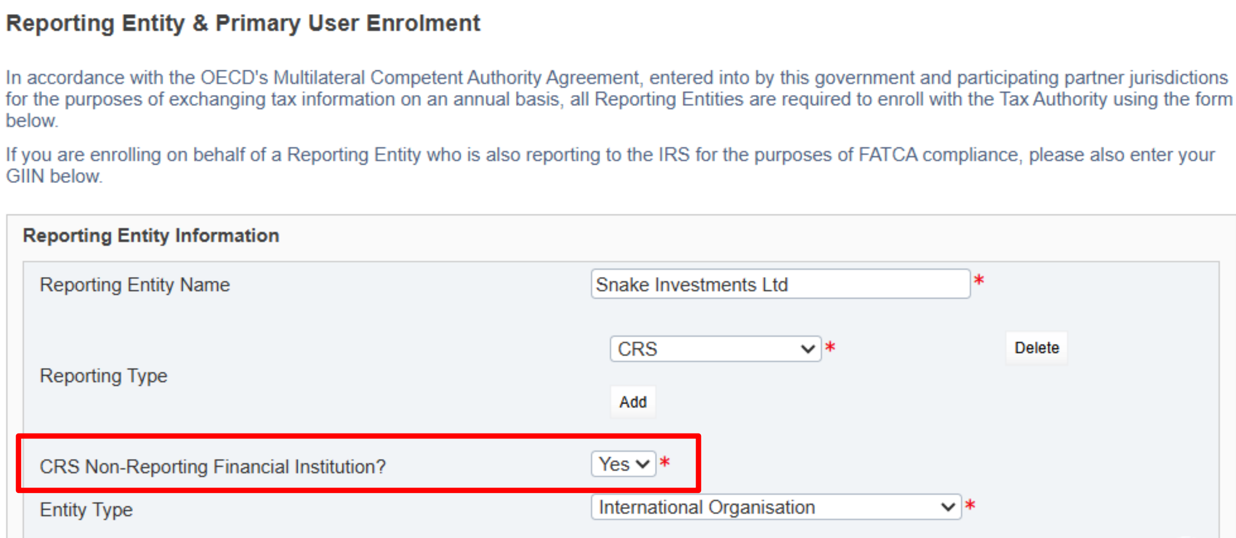


1.3 Non Reporting Financial Institution Process

For Financial Institutions to enrol as a Non Reporting Financial Institution the following steps need to be taken:
On the Public Enrolment Form.

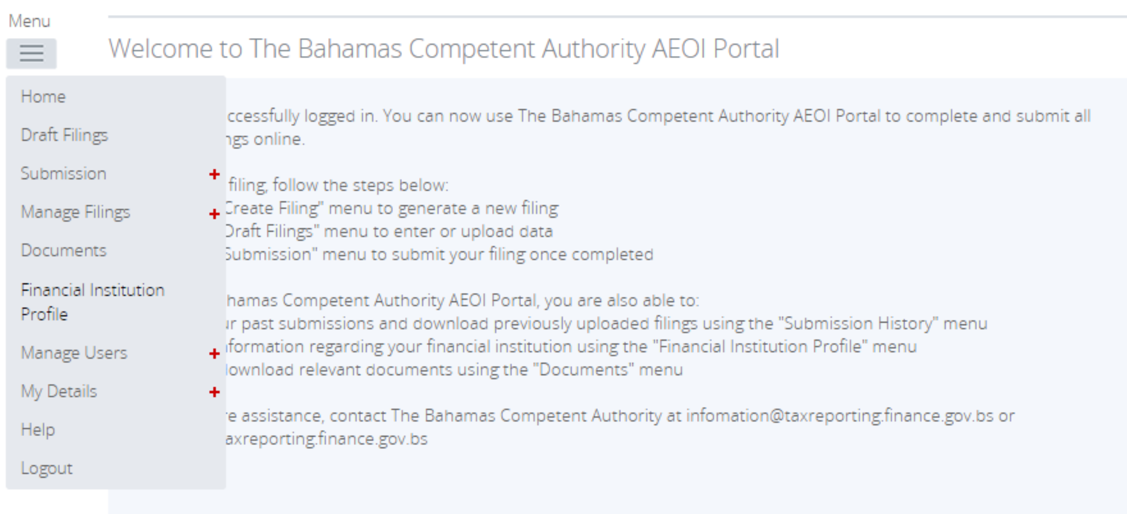
Select **CRS** as Reporting Type. Select **Yes** for CRS Non-Reporting Financial Institution. Select **Entity Type**.

Complete the rest of the form as seen in Section 1.1 and click **Submit**.



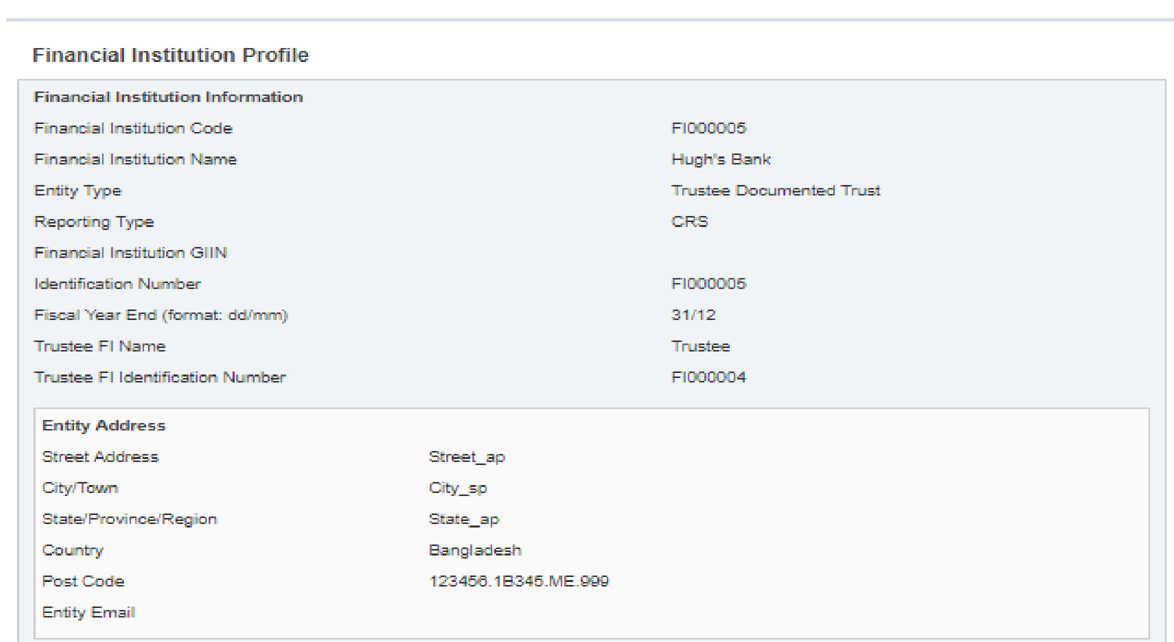
2 ▪ Trustee Documented Trusts (TDT) Profile

Once a Financial Institution has been successfully enrolled on the '*The Bahamas Competent Authority AEOI Portal' as* Trustee Documented Trusts (TDT) Profile, the assigned portal users will be able to view their Financial Institution profile information by selecting the 'Financial Institution Profile' tab from the task bar menu.



The Financial Institution Profile page has been updated allowing the Entity Type of Trustee Documented Trust.

If an FI has been enrolled as a Trustee Documented Trust, then the Trustee FI Name and Trustee FI information will be detailed along with the rest of the FI details.



Note: the fields '**Trustee FI Name**' and '**Trustee FI Identification Number'** are **hidden** if the entity Type is not TDT. This is to avoid confusion for **non- TDT FIs**.

3 Logging in and updating your user details

3.1 Logging in to The Bahamas Competent Authority AEOI Portal

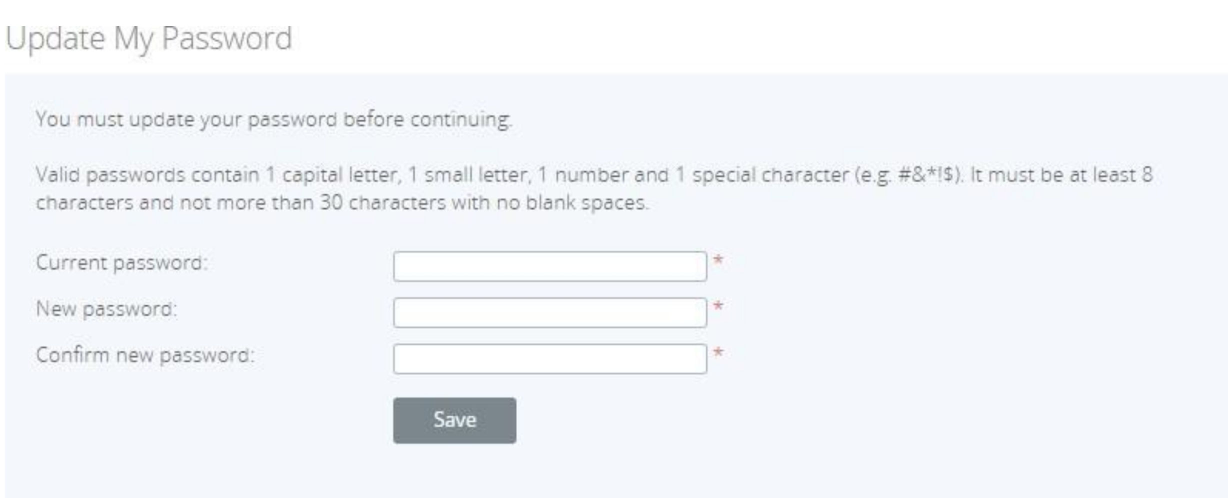
After your enrolment form has been reviewed and approved, your Reporting Entity and Primary User account will be created in **The Bahamas Competent Authority AEOI Portal**. You will receive a system-generated email titled "New Bahamas Tax Information Reporting Portal User Account" containing your username (the Primary User Email Address entered on the enrolment form) and temporary password, as well as a link to the system.

Important note: If your enrolment information is not deemed complete and accurate, you will receive a "Bahamas Tax Information Reporting Portal: Enrolment Unsuccessful" email, which will include the reason your enrolment was declined. You will need to access the enrolment form again and complete it with corrected information and/or documents, as outlined in *Section 2 - Enrolment* above.

1. Accessing the link found in your Account Activation email will present you with **The Bahamas Competent Authority AEOI Portal** login page, as shown in the image below.

2. Enter your email address and password and select the **Login** button. Upon first login to the system, you will be asked to change your password as shown in the image below.

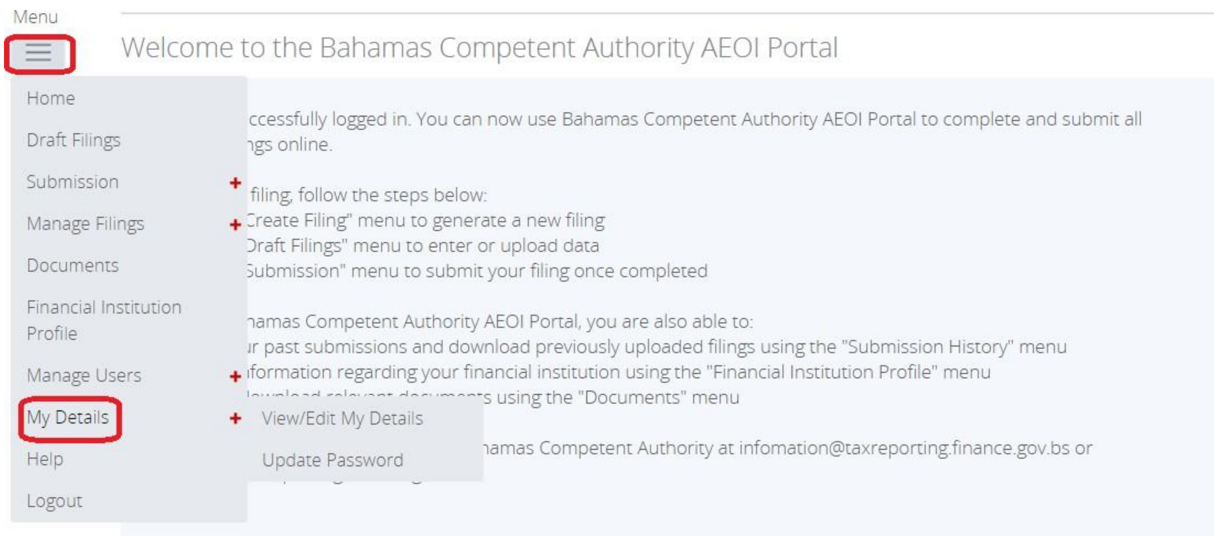
    - **Important Note:** The password must be between 8 and 30 characters, and must contain 1 capital letter, 1 lower case letter, 1 number, and 1 special character (e.g. #&*!$).



3.2 Updating your details

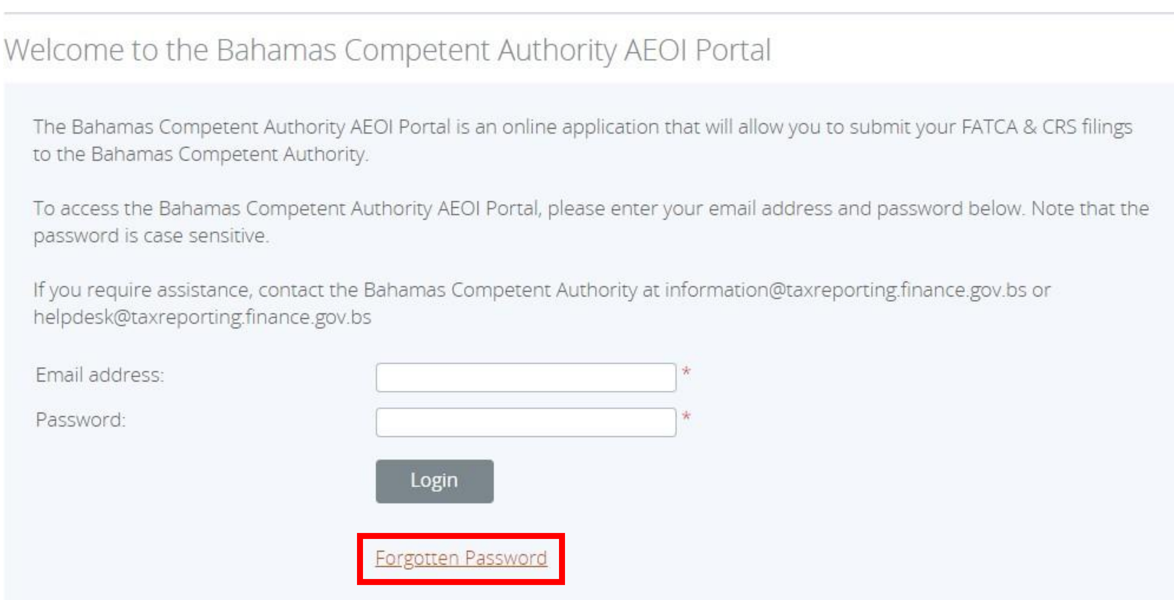
At any time you can update your user details (name, email address, and phone number) by navigating to **My Details > View/Edit My Details** or change your password by navigating to **My Details > Update My Password** using the menus at the top of the page.

- **Important note:** Changing your email address will change the email address you use to log in to the system as well as the email address to which system-generated emails are sent.

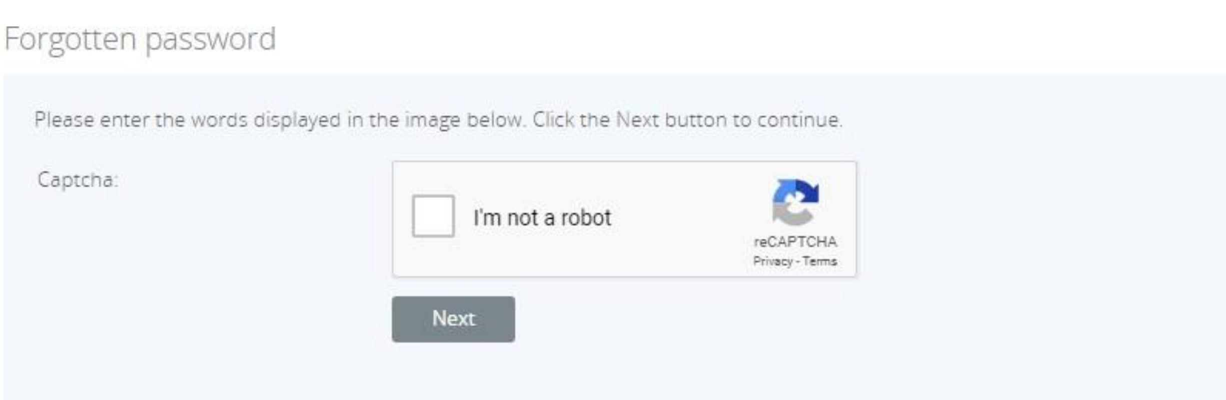


3.3 Resetting your password

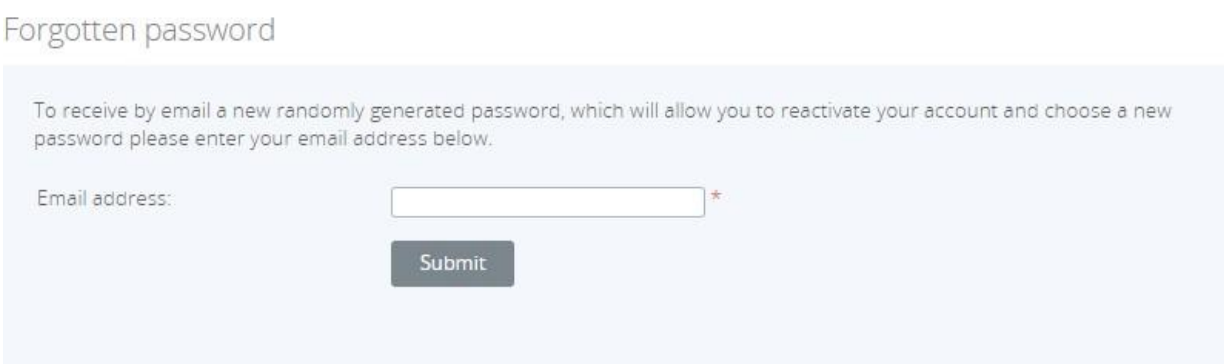
If you have forgotten your password, you can reset it using the **Forgotten Password** link on **The Bahamas Competent Authority AEOI Portal** login page.



1. Select the Forgotten Password link on the login page. You will be presented with a security image similar to the one shown in the image below. Solve the Captcha challenge and select "**Next**".



2. You will be presented with the below screen asking you to enter the username (email address) that is associated with your account.



3. Enter your email address and click '**Submit'**.

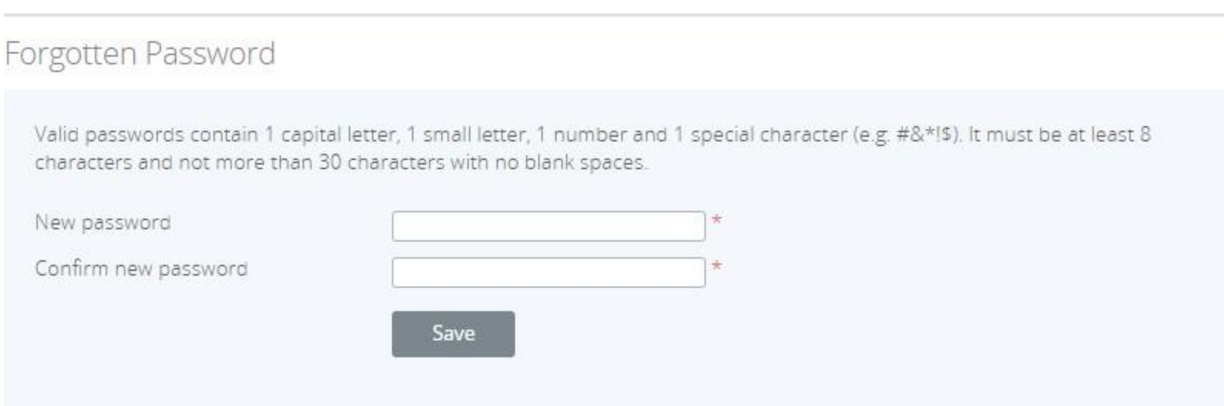
4. You will receive an email address titled "Bahamas Competent Authority AEOI Portal account password change request". The email includes a link that must be selected within 20 minutes of selecting the Forgotten Password option, for security purposes.

5. Select the link contained in the email

    - **Important Note:** If you fail to select the link in the email within 20 minutes, you will need to begin the process again by selecting the Forgotten Password link on the login page

6. You will be presented with a Forgotten Password page. Enter your new password and select "Save".

    - **Important Note:** The password must be between 8 and 30 characters, and must contain 1 capital letter, 1 lower case letter, 1 number, and 1 special character (e.g. #&*!$).



7. You will be returned to the login page, where you can now log in with your email address and reset password.

3.4 Updating reporting obligations after enrolment

If you have already submitted an enrolment form and received your credentials for the system, you must not submit another enrolment form. If you wish to update your obligations, please do so using the **Change of Reporting Obligations** form, outlined below.

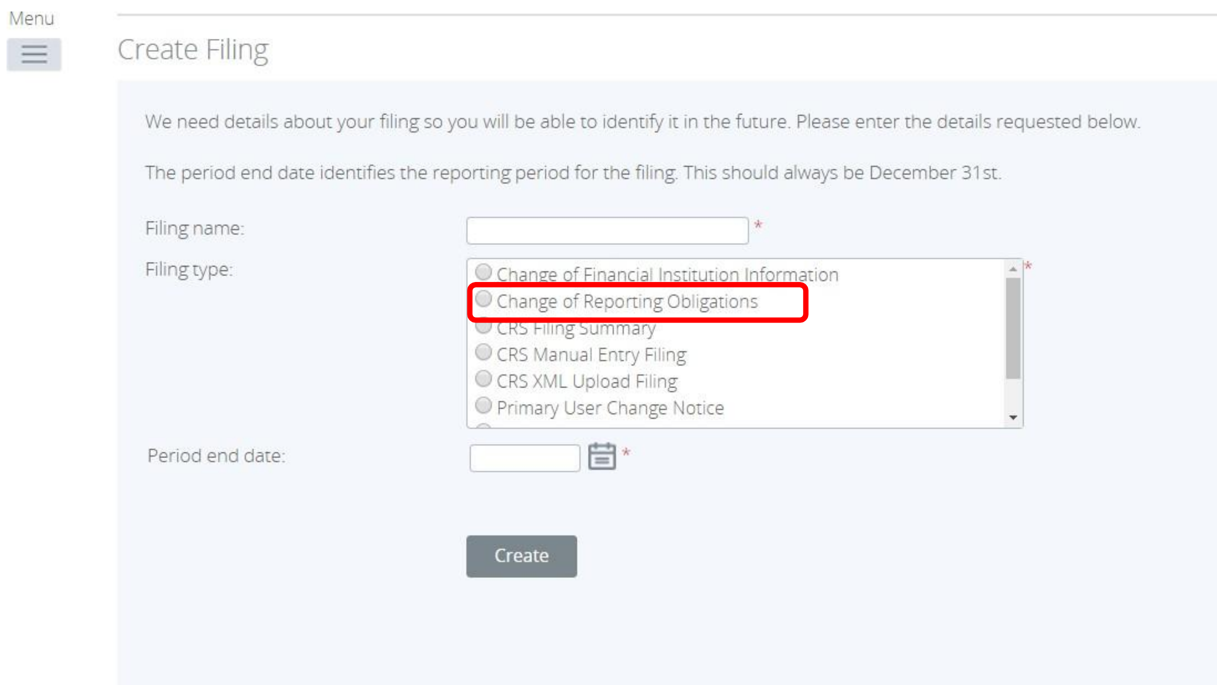
For example, if you have already enrolled for CRS reporting and later learn of an obligation to notify for FATCA as well, you can update your reporting obligations using the below process. A second enrolment form should not be submitted.

3.4.1 Creating a Change of Reporting Obligations filing

In order to notify the Bahamas Competent Authority of updated reporting obligations, you must first create a **Change of Reporting Obligations** filing.

1. Navigate to the **Create Filing** screen using the menu at the top left of the screen. Select **Manage Filings** > **Create Filings**, as shown in the image below.

2. You will be presented with the **Create Filing** page, as shown in the image below.



3. Enter a **Filing name** that is meaningful to you. It is best practice to include "Change of Reporting Obligations" so that filings can be easily differentiated from CRS and FATCA filings.

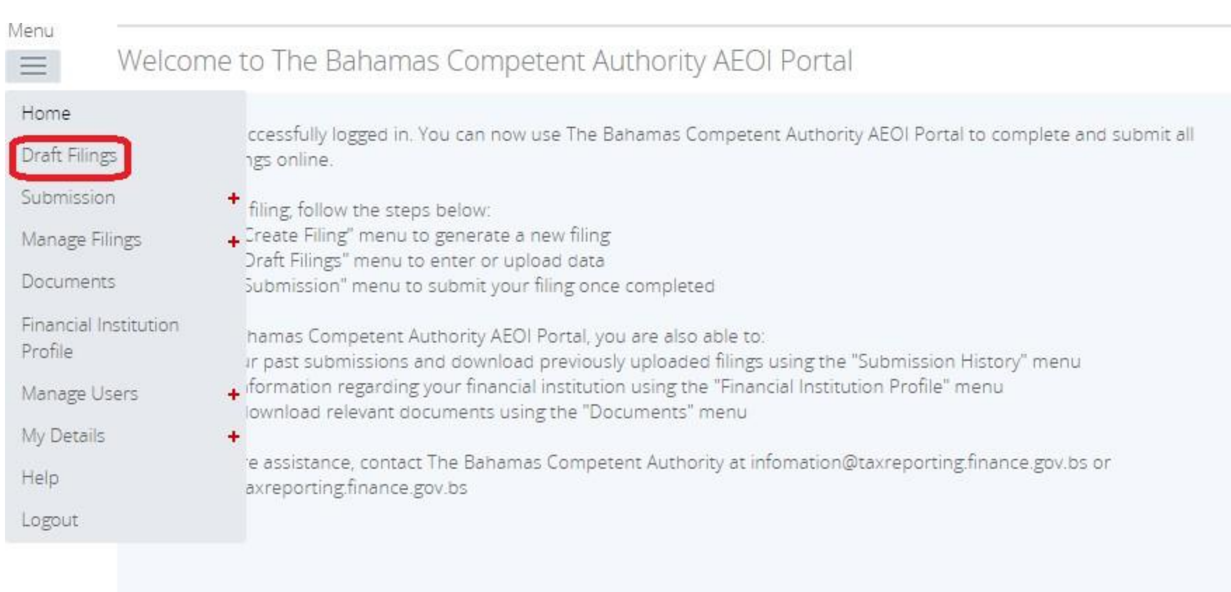
4. Select "**Change of Reporting Obligations**" as the **Filing type**.

5. Select the **Period end date** for the filing. For the Change of Reporting Obligations form, this should be the <u>current date</u>.

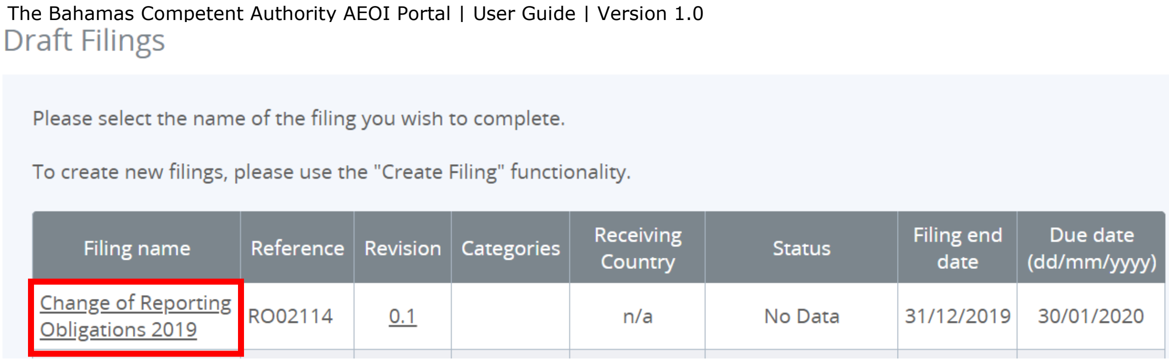
6. Select the **Create** button to complete the creation of your form and make it available to submit a change of reporting obligations.

3.4.2 Completing a Change of Reporting Obligations form

1. Navigate to the **Draft Filings** screen using the menu at the top left of the screen to view filings and forms that you have created but not yet submitted.



2. Select the name of the form you created from the **Filing name** column of the Draft Filings table to open that filing. You will be presented with the **Draft Filing** screen for the Change of Reporting Obligations form.

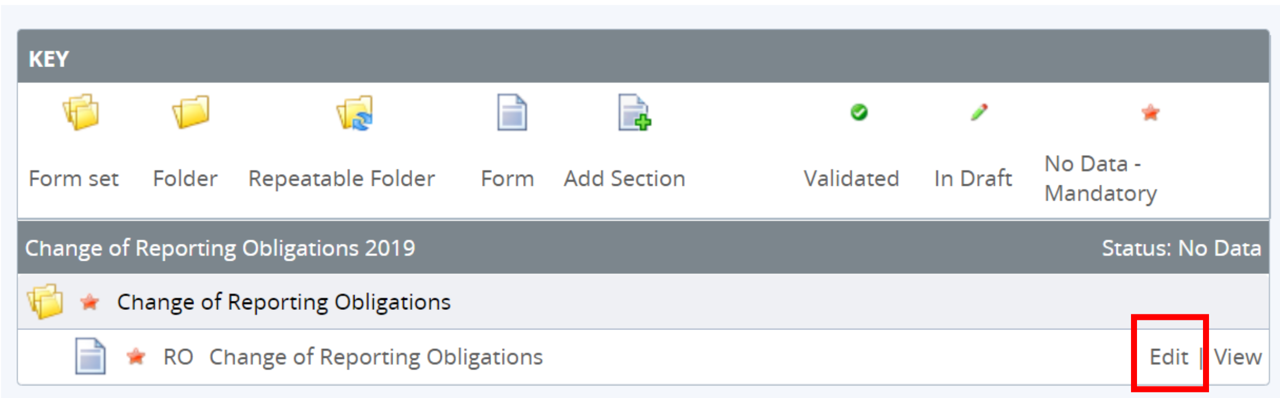

Draft Filings

Please select the name of the filing you wish to complete.

To create new filings, please use the "Create Filing" functionality.

Filing name	Reference	Revision	Categories	Receiving Country	Status	Filing end date	Due date (dd/mm/yyyy)
Change of Reporting Obligations 2019	RO02114	0.1		n/a	No Data	31/12/2019	30/01/2020

3. Select the **Edit** link beside the Change of Reporting Obligations form to display the form below. Note that the form will be pre-populated with the current Reporting Type and Fiscal Year End stored for your entity.

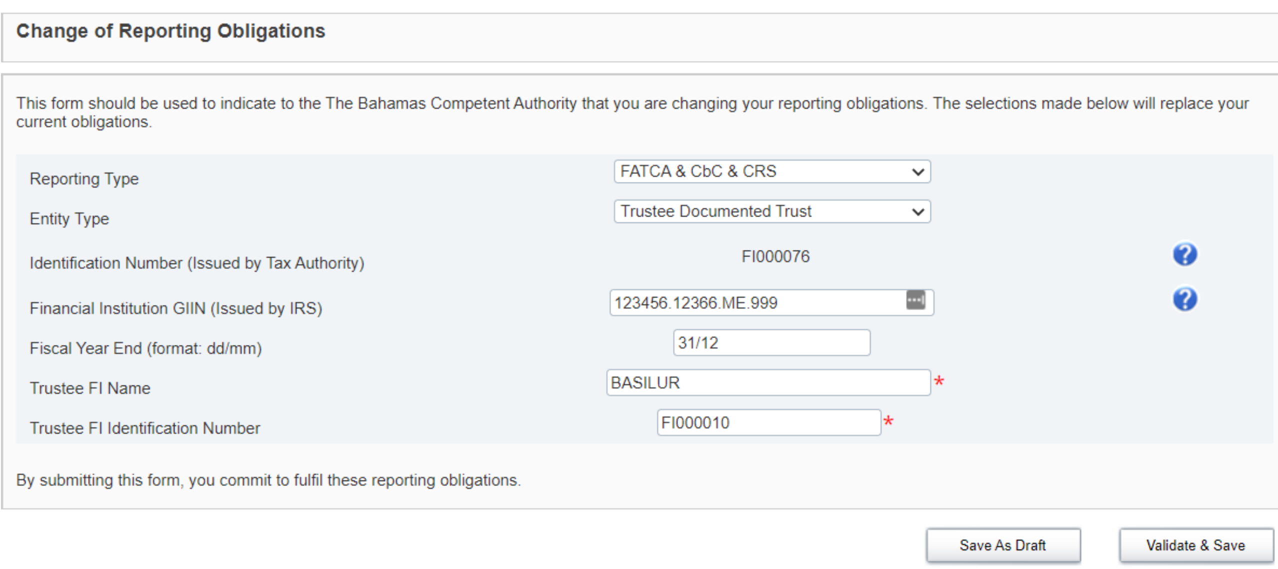


4. Update your Reporting Type by selecting either “FATCA”, “CRS” or “CRS & FATCA” from the drop down list.

5. Update your Entity Type if applicable

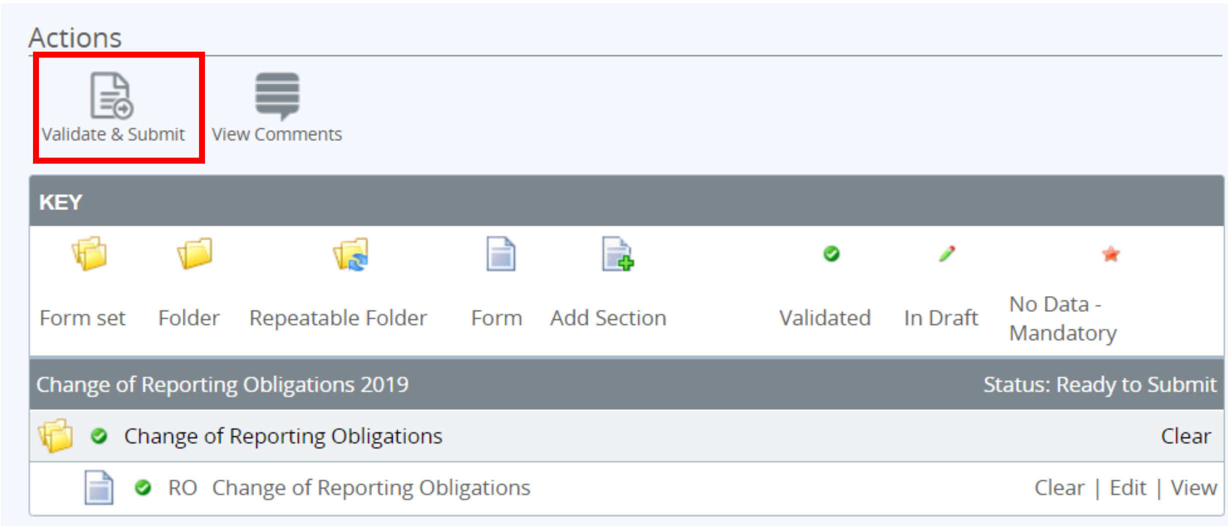
6. Update/add your GIIN if applicable

7. Update/add your Fiscal Year End.

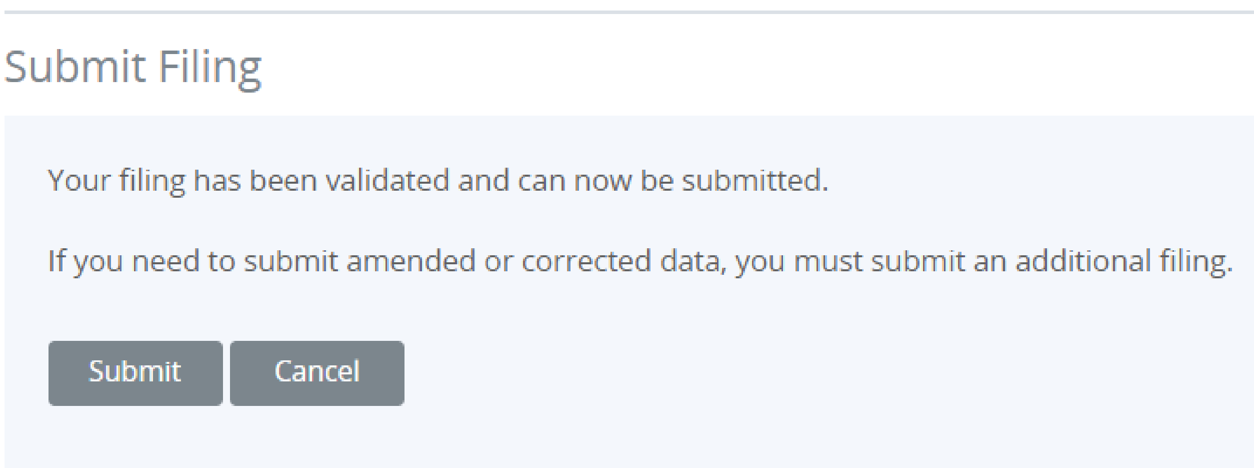


8. Select “**Validate & Save**”. You will be brought back to the Draft Filing screen for this Change of Reporting Obligations filing.

Click **Validate & Submit button** above the Key.



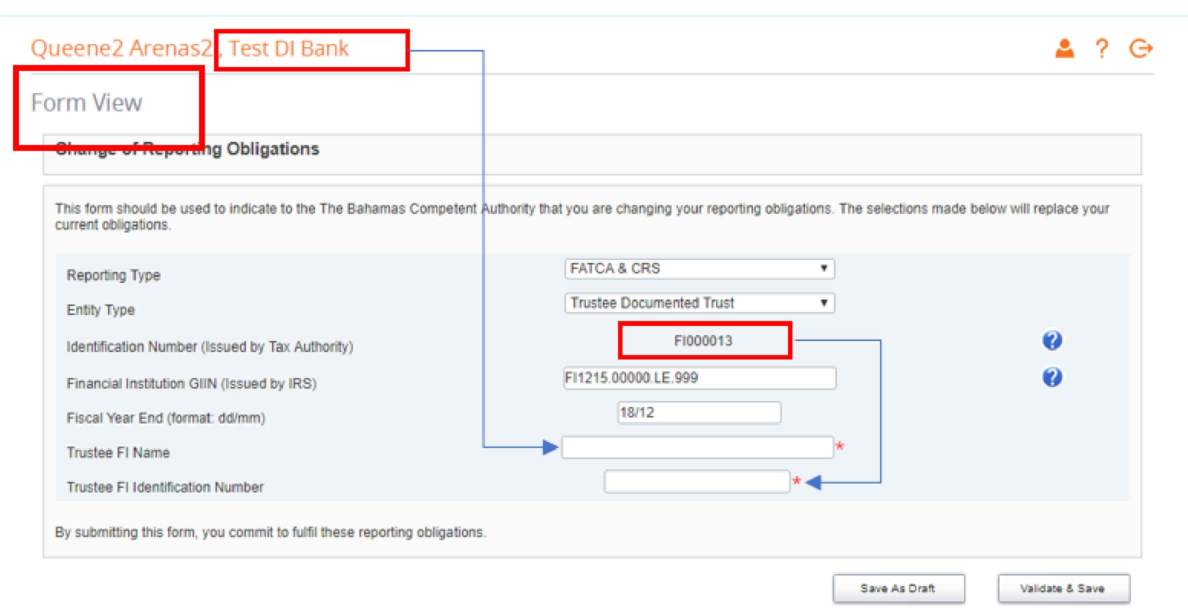
9. You will be presented with the **Submit Filing** page. Select **Submit** to confirm submission.



3.4.3 Change of Reporting Obligations as a TDT

In the event of **Trustee Documented Trusts Entity requires to update their reporting obligations, then the completion of a** 'Change of Reporting Obligations Form' will need to be completed and submitted.

For FI's registered as A TDT, then two extra steps are required to be completed when filling out and 'Change of Reporting obligations' form.



TDT's will be required to fill out both their Trustee FI Name and Trustee FI Identification number.

Once the Information is completed, the user will be able to save and submit the form as normal.

In the event of incorrect information in either the Trustee FI Name and/or the Trustee FI Identification number. The following validation error will trigger upon attempted submission:

Submission Validation Issues

Our checks have found some issues that need to be reviewed before you can submit. Please see below for details.

Rule name	Type	Problem	Additional information
Trustee FI Check	Error	1. The Trustee FI name and Trustee FI reference number provide do not match to an active FI in the system.	Review your Change of Reporting Obligations form to ensure the provided Trustee FI Name and Reference match an Active FI in the system.

Printer Friendly Format | Show errors in new window

In this event, the user will need to re-enter the correct information and attempt submission again.

Once the form has been successfully submitted, the FI's Reporting obligations will automatically update.

3.5 Updating Reporting Entity details after enrolment

If you have already submitted an enrolment form and received your credentials for the system, you must not submit another enrolment form. If you wish to update certain details regarding your entity, please do so using the **Change of Reporting Entity Information** form, outlined below.

The following information can be updated by submitting a **Change of Reporting Entity Information** form:

i. Entity Type
ii. Reporting Entity GIIN (if applicable)
iii. Fiscal Year End
iv. Entity Address
v. Institution Email

Important note: The Change of Reporting Entity Information form cannot be used to update the following:

i. Reporting Entity Name: please contact helpdesk@taxreporting.finance.gov.bs if you need to update your Financial Institution's name

ii. Reporting Type: please submit a Change of Reporting Obligations form if you would like to update your reporting type (see *Section 2.3 – Updating reporting obligations after enrolment*)

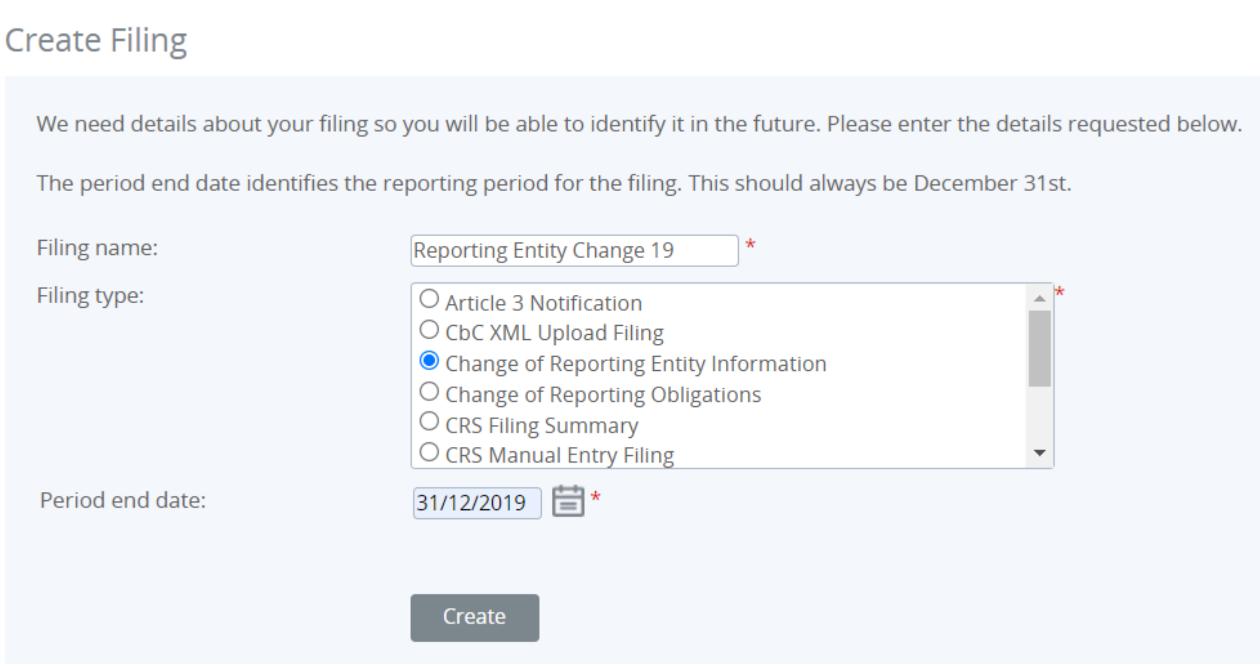
iii. Primary User: please submit a Primary User Change Notice if you would like to update your entity's Primary User (see *Section 13 – Updating a Primary User*)

3.5.1 Creating a Change of Reporting Entity Information filing

To update certain details about your Financial Institution, you must first create a **Change of Reporting Entity Information** filing.

1. Navigate to the **Create Filing** screen using the menu at the top left of the screen. Select **Manage Filings** > **Create Filings**, as shown in the image below.

2. You will be presented with the **Create Filing** page, as shown in the image below.



3. Enter a **Filing name** that is meaningful to you. It is best practice to include the change being made so that filings can be easily differentiated from other filings.

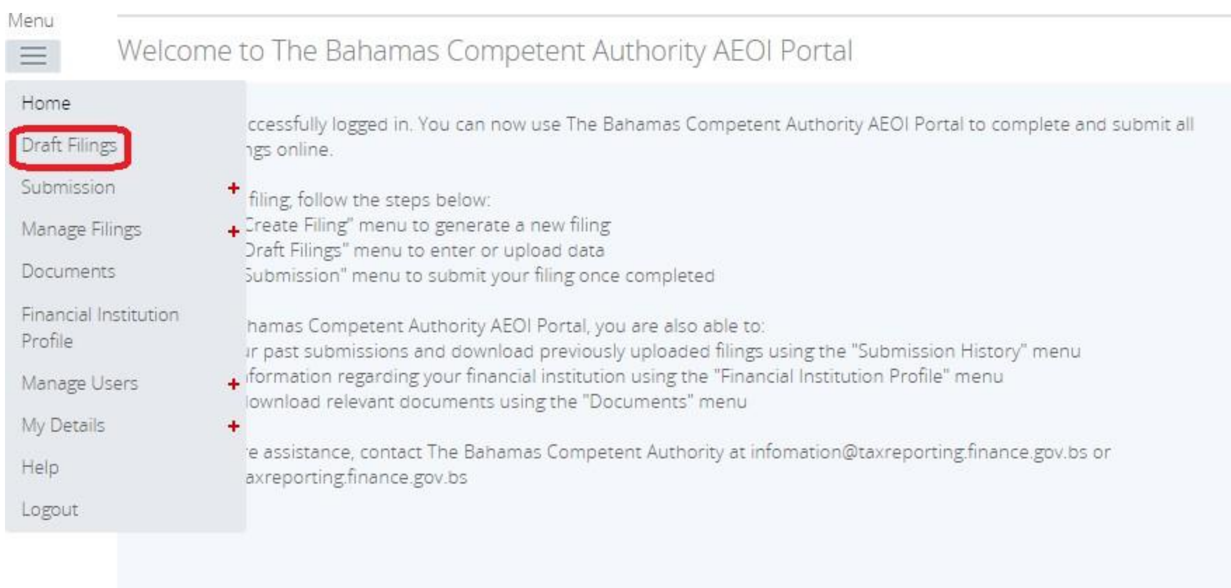
4. Select "Change of Reporting Entity Information" as the **Filing type**.

5. Select the **Period end date** for the filing. For the Change of Reporting Entity Information form, this should be the current date or the date in which the change was effective.

6. Select the **Create** button to complete the creation of your form and make it available to submit.

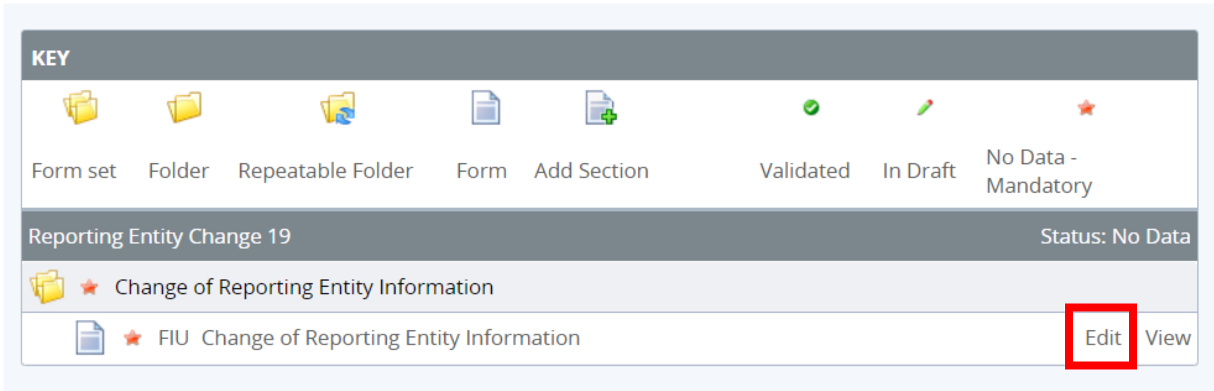
3.5.2 Completing a Change of Reporting Entity Information form

1. Navigate to the **Draft Filings** screen using the menu at the top left of the screen to view filings and forms that you have created but not yet submitted.



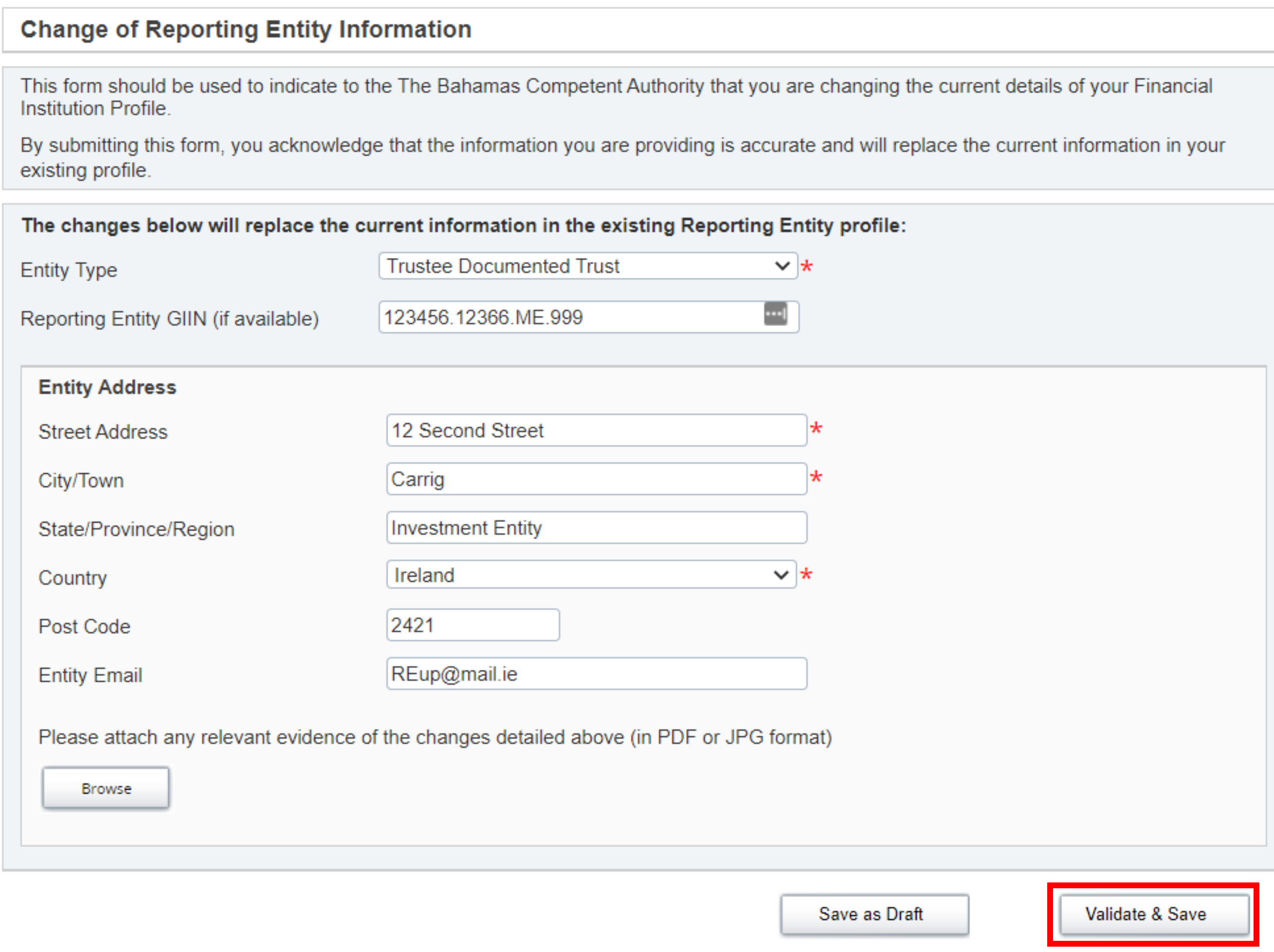
2. Select the name of the form you created from the **Filing name** column of the Draft Filings table to open that filing. You will be presented with the **Draft Filing** screen for the Change of Reporting Entity Information form.

3. Select the **Edit** link beside the Change of Reporting Entity Information form to display the form below. Note that the form will be pre-populated with the current information stored in your entity's profile.

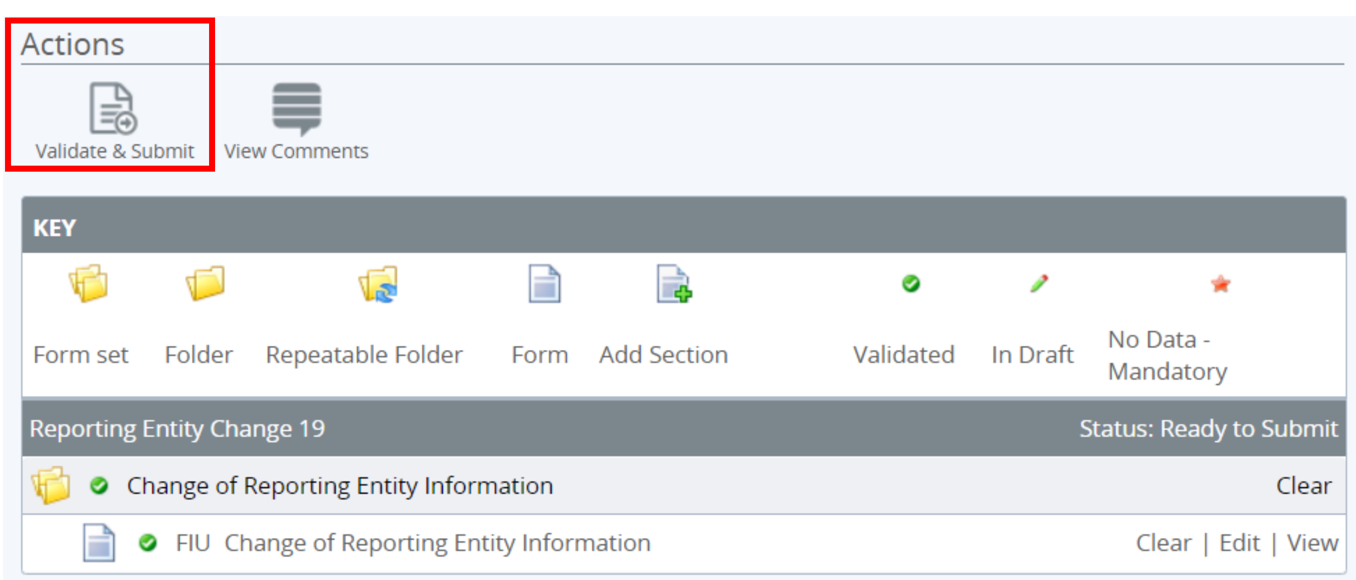


4. Update your information as required, including uploading any documentary evidence of the change using the "**Browse**" button**.**

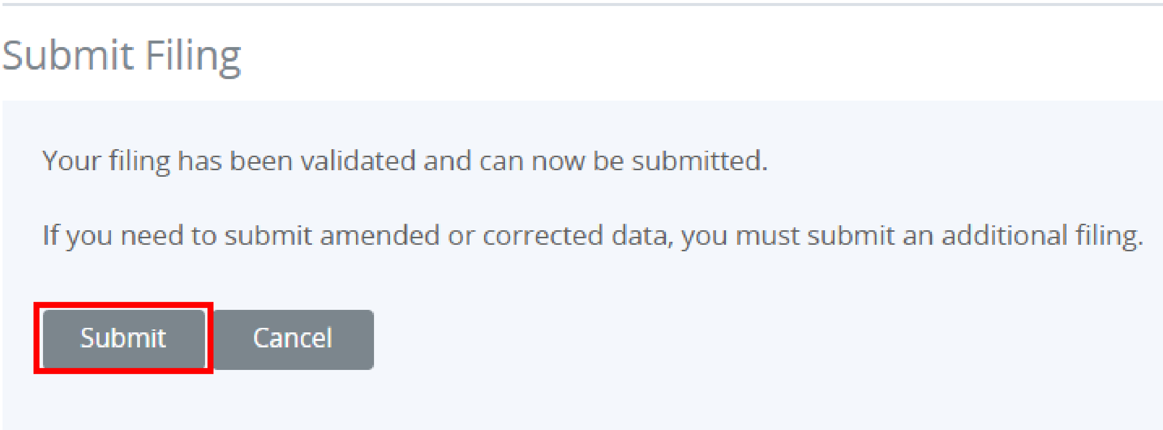
5. Click "**Validate & Save**". You will be brought back to the Draft Filing page for the filing.



6. Click **Validate & Submit** above **Key**



7. You will be presented with the **Submit Filing** page. Select **Submit** to confirm submission. Your changes will be reflected on the **Reporting Entity Profile** tab.



4 Submitting CRS filings

The Bahamas Competent Authority AEOI Portal provides Bahamas CRS Reporting FIs with two options for submitting CRS filings:

i. Manual Entry via online web forms; or,

ii. Upload of an XML file that complies with the CRS XML Schema v.2.0 as published by the OECD.

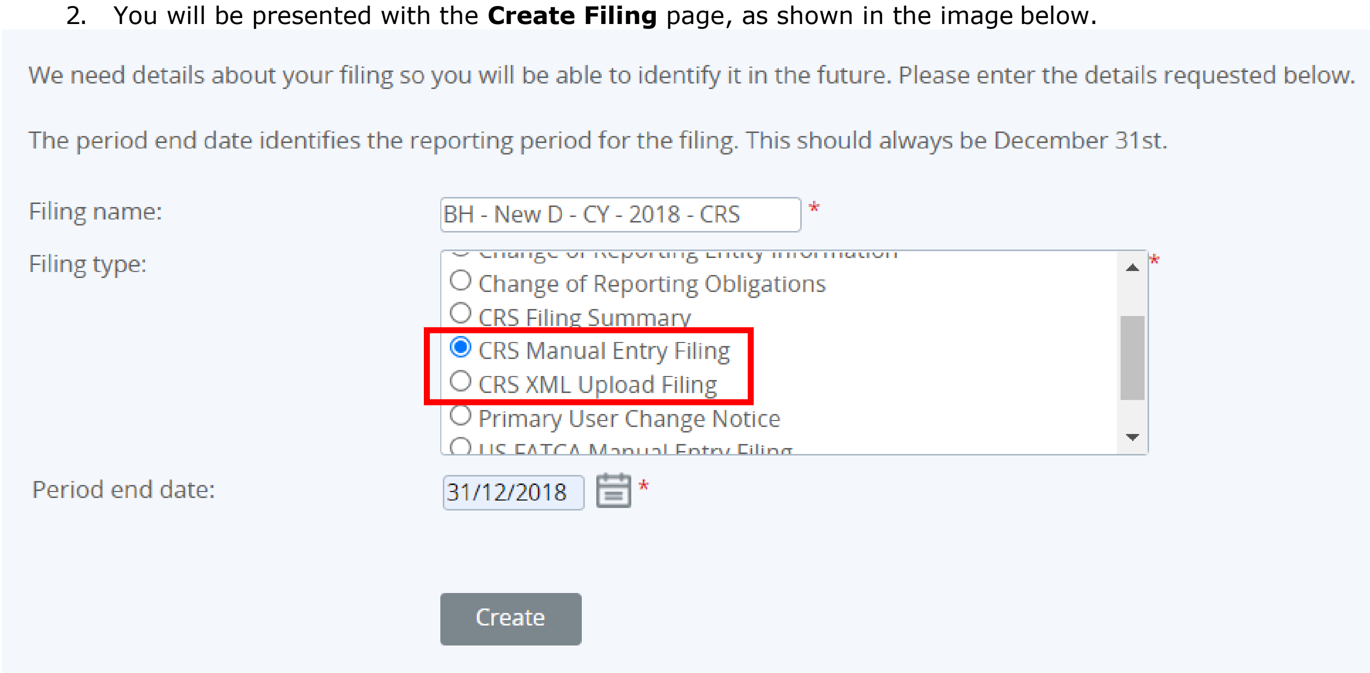
Important Note: a separate Manual Entry or XML Upload filing must be created and submitted for <u>EACH</u> reportable jurisdiction your entity has reportable accounts for.

4.1 Creating CRS filings

In order to submit data to the Bahamas Competent Authority to meet your CRS reporting requirements, you must first create a filing.

1. Navigate to the **Create Filing** screen using the menu at the top left of the screen. Select **Manage Filings** > **Create Filing**, as shown in the image below.

2. You will be presented with the **Create Filing** page, as shown in the image below.



3. Enter a **Filing name** that is meaningful to you. It is best practice to include the jurisdiction country code, type of document, and the year (e.g. IE - New Data – 2016, UK - Corrected Data – 2016, etc.) so that filings can be easily differentiated over time.

4. Select the **Filing type** that you want to complete.

   - **Important note:** If you will be <u>providing data in an XML file</u>, you must choose the *CRS XML Upload Filing* filing type. If you will be <u>entering data manually in a web form</u>, you must choose the *CRS Manual Entry Filing* filing type.

5. Enter the **Period end date** for the filing.

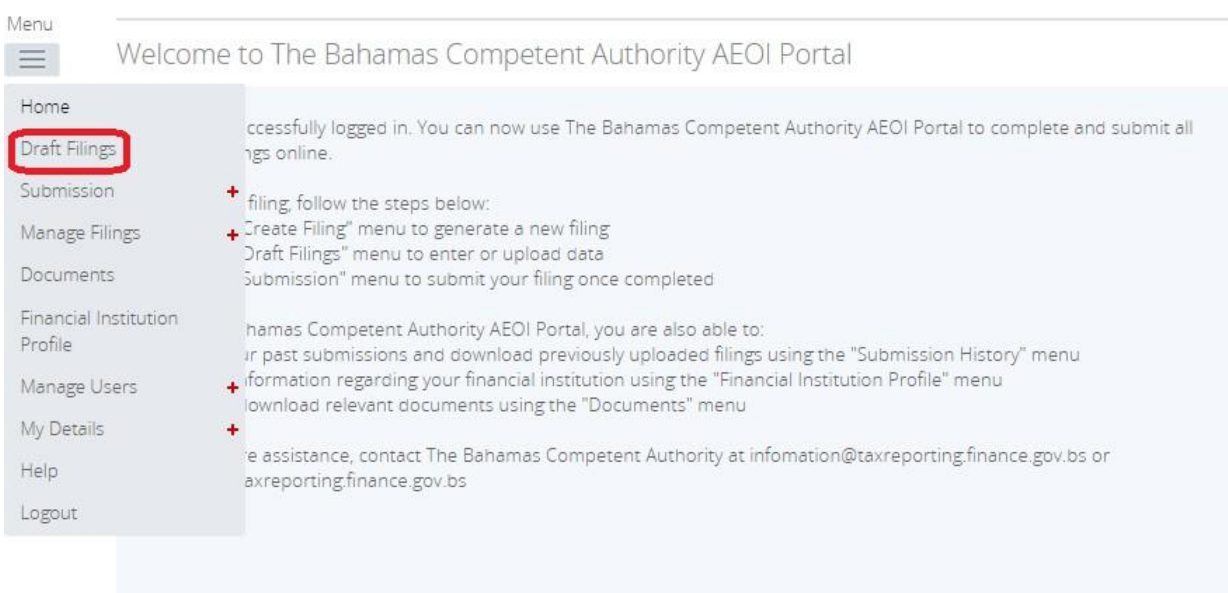
- **Important note:** The period end date is the last day of the reporting period (the calendar year). For CRS, this date must **always be December 31st**. Failure to select December 31st will result in an error being displayed on screen.

6. Select the **Create** button to complete the creation of your filing and make it available to enter or upload data.

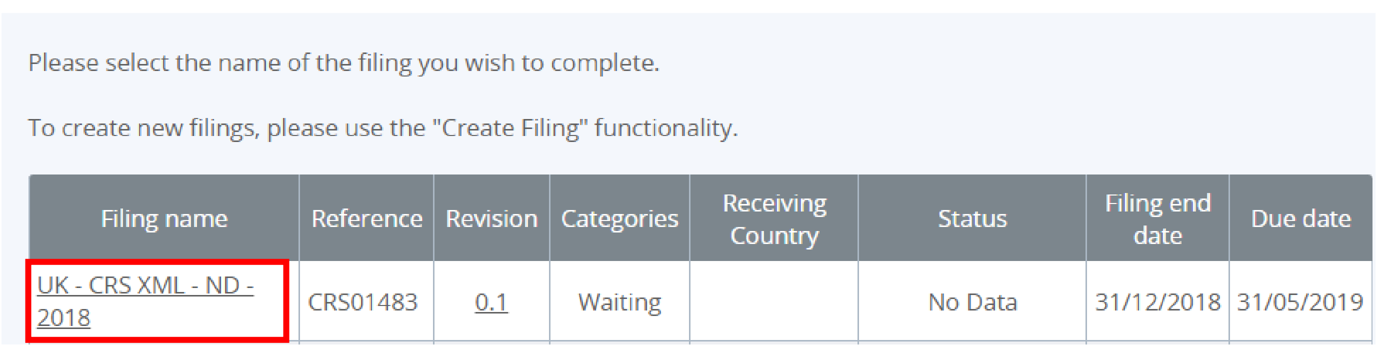
4.2 Submitting a CRS filing via XML Upload

If you have chosen the CRS XML Upload filing (see section *4.1 Creating CRS filings*), you will submit your CRS data by uploading an XML file into the filing.

1. Navigate to the **Draft Filings** screen using the menu at the top left of the screen to view filings that you have created but not yet submitted.



2. Select the name of the filing you created from the **Filing name** column of the Draft Filings table to open that filing. You will be presented with the **Draft Filing** screen for that filing.

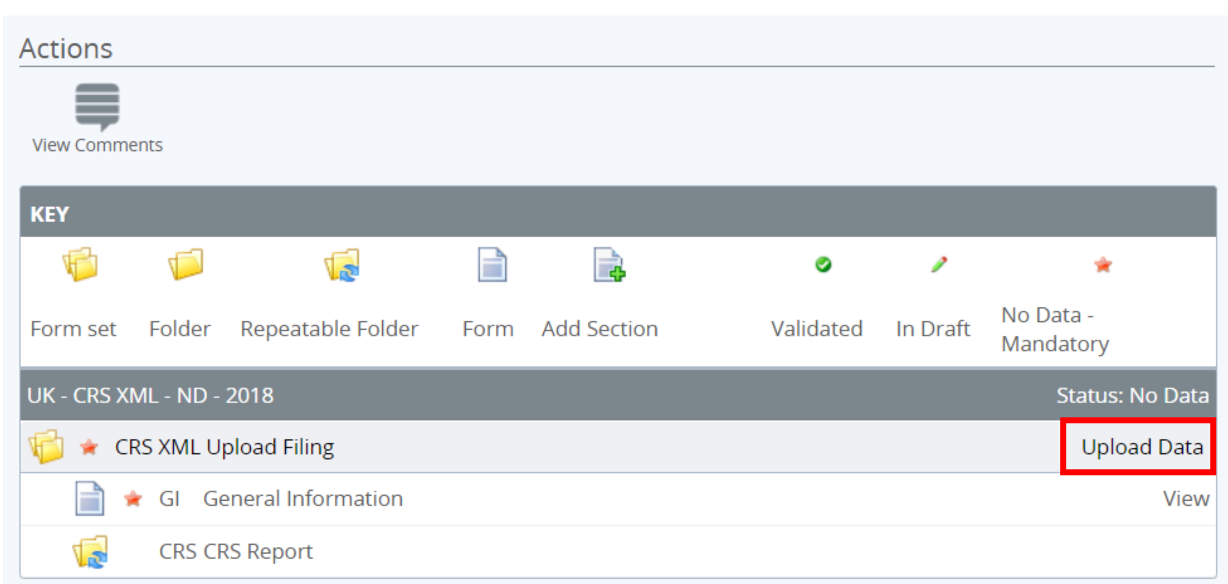


Please select the name of the filing you wish to complete.

To create new filings, please use the "Create Filing" functionality.

Filing name	Reference	Revision	Categories	Receiving Country	Status	Filing end date	Due date
UK - CRS XML - ND - 2018	CRS01483	0.1	Waiting		No Data	31/12/2018	31/05/2019

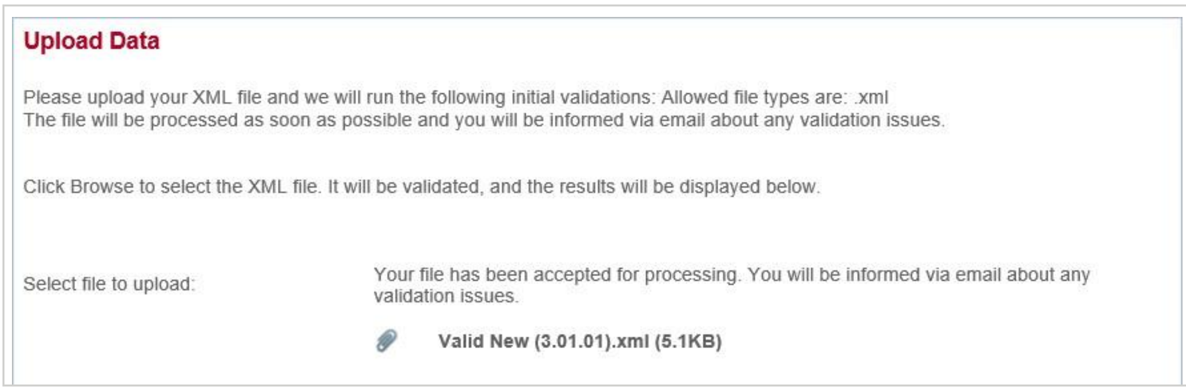
3. Select the **Upload data** link within the filing table. You will be presented with the **Upload Data** page.



4. Select the **Browse** button and choose the file you want to upload. Only files in XML format will be accepted, and they must comply with the CRS XML schema v.2.0 as published by the OECD (http://www.oecd.org/tax/automatic-exchange/common-reporting-standard/schema-and-user- guide/).
5. The system will begin validation of your file immediately against the OECD CRS XML schema and

business rules. If you have uploaded a file that is not an XML file, you will see an error message on the Upload Data page informing you of that error.

6. If you do not receive any error message on the Upload XML page, the file will be submitted for processing and additional validation will be applied. More details on the validation that will be applied to all files can be found in *Section 5.1 - Summary of CRS validation rules*.

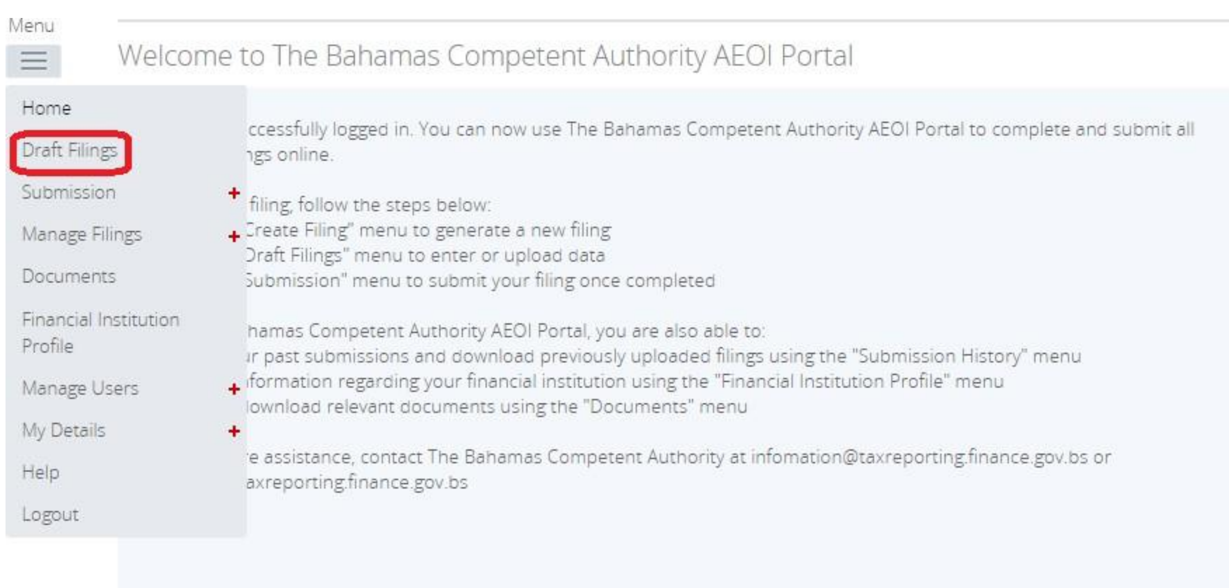


7. You will receive a system-generated email when the processing is complete, indicating either that your submission was successful, or that the submission was unsuccessful and that the file must be updated and resubmitted.

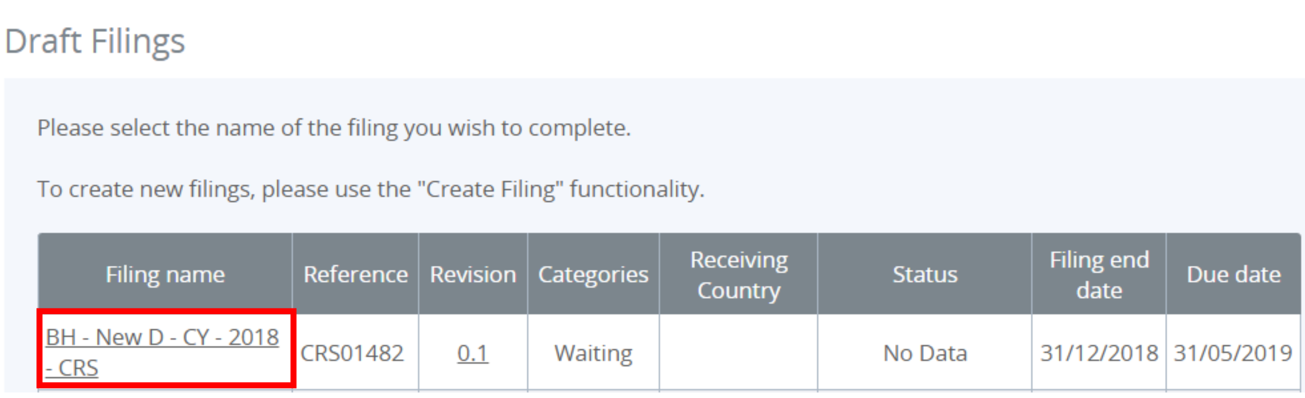
4.3 Submitting a CRS filing via Manual Entry

If you have chosen the CRS Manual Entry filing (see section *4.1 Creating CRS filings*), you will submit your CRS data by typing data into web forms.

1. Navigate to the **Draft Filings** screen using the menu at the top left of the screen to view filings that you have created but not yet submitted.

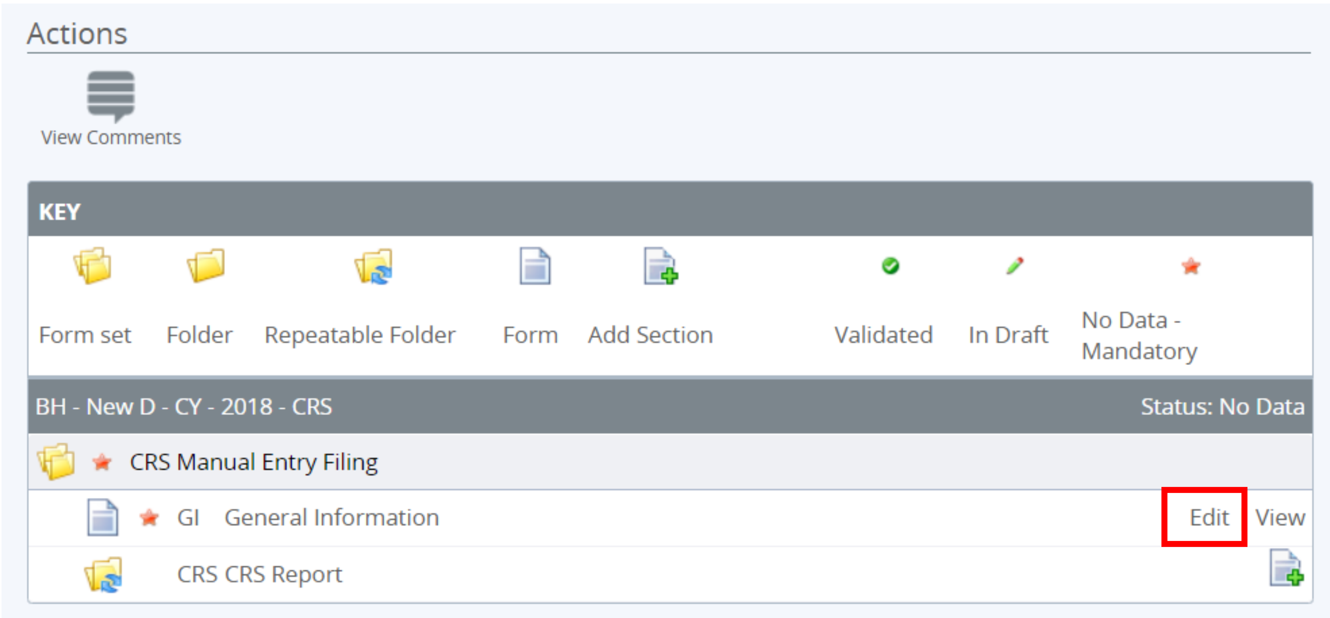


2. Select the name of the filing you created from the **Filing name** column of the Draft Filings table to open that filing. You will be presented with the **Draft Filing** screen for that filing.

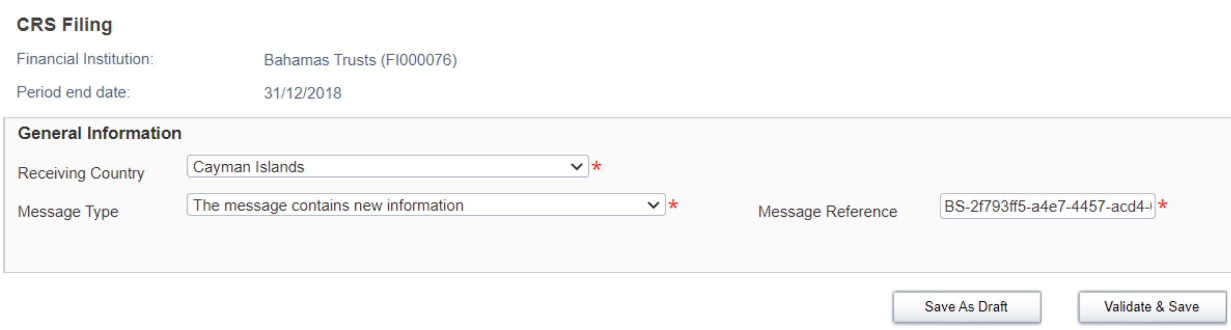


Filing name	Reference	Revision	Categories	Receiving Country	Status	Filing end date	Due date
BH - New D - CY - 2018 - CRS	CRS01482	0.1	Waiting		No Data	31/12/2018	31/05/2019

3. Select the **Edit** link beside the **General Information** form to confirm the receiving country and message type related to the filing being submitted.



4. You will be presented with the editable form for data entry. The image below is a sample **General Information** form.



5. Select the **Receiving Country** associated with the filing from the drop-down, which is restricted to only include the list of reportable jurisdictions.

   - **Important Note:** A separate filing will be required for each reportable jurisdiction the entity has reportable accounts for.

6. Confirm the **Message Type** for the filing:

   - *The message contains new information* should be selected for the original filings being sent to reportable jurisdictions for the reporting period.

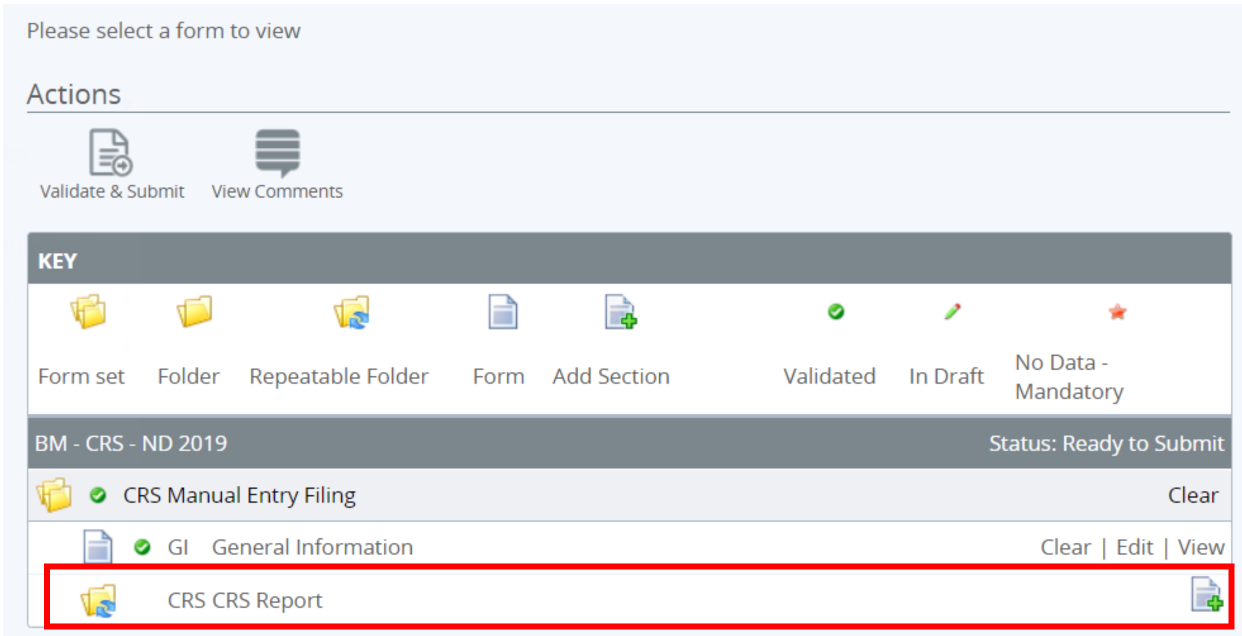
   - *The message contains corrections for previously sent information* should be selected for any subsequent corrections/deletions being sent to reportable jurisdictions for previously submitted filings for the reporting period.

7. Select "**Validate & Save**" to proceed.

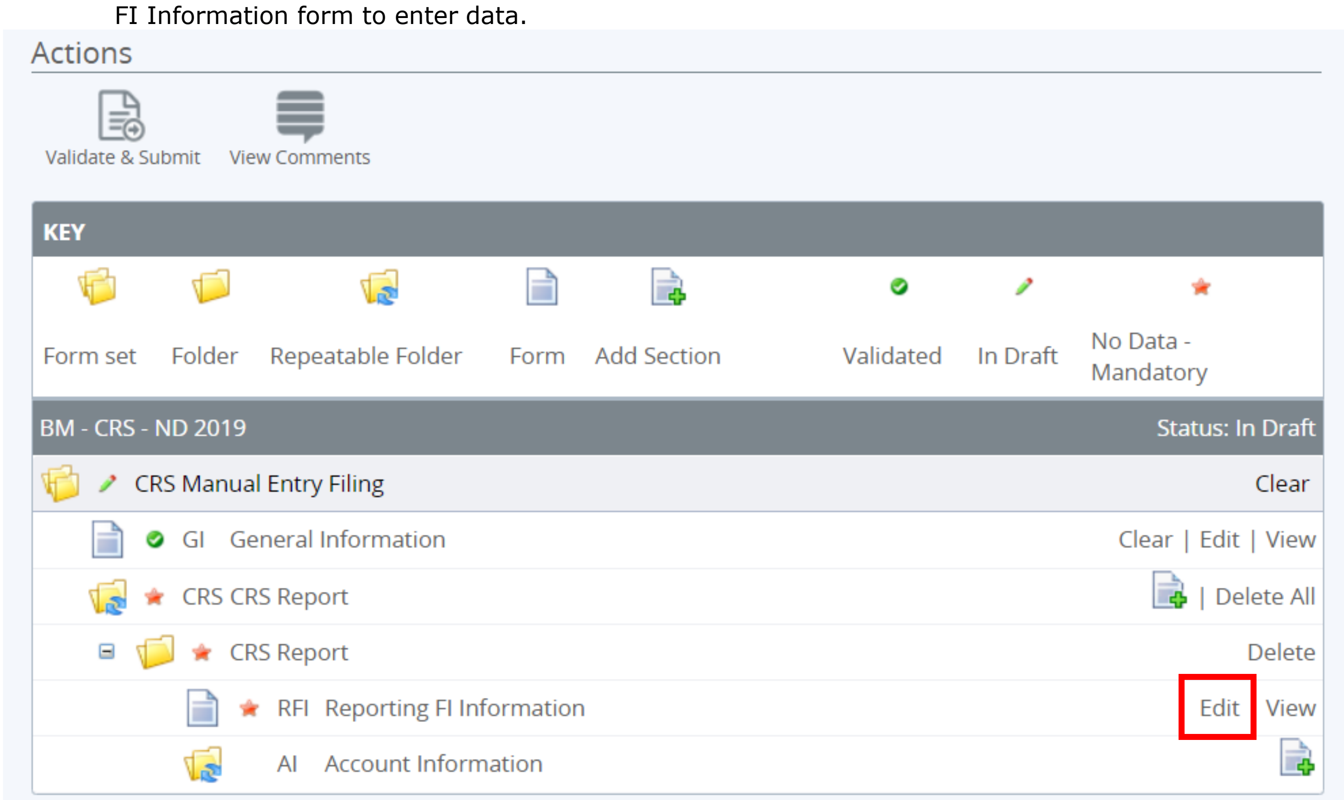
   - **Important Note:** If you are alerted to any errors on the form, these must be corrected before proceeding, or selecting "Save as Draft" allows you to bypass on-form validation and save the data as draft until your return.

8. To complete the remainder of the filing, select the **Add Section** icon next to the CRS Report repeatable folder to generate a CRS Report folder.

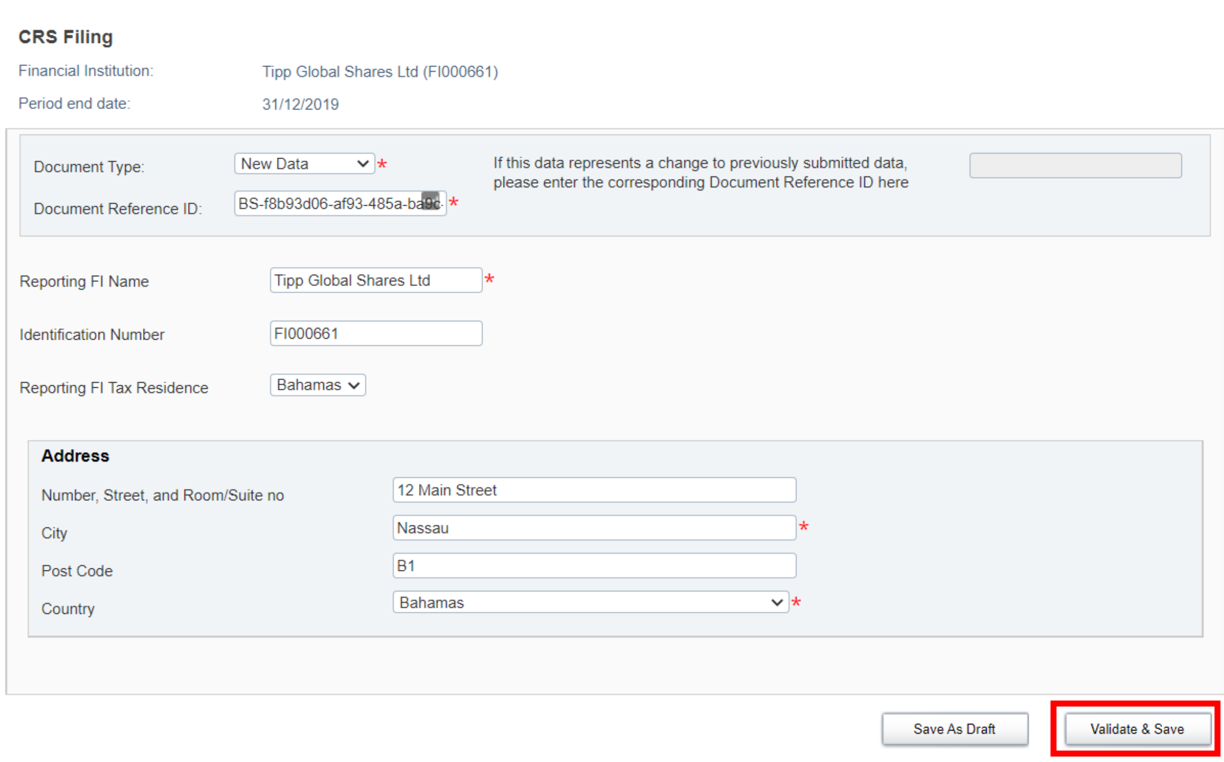
   - **Important Note:** Each CRS filing should only contain a single CRS Report folder, as they should include accounts for a single Reporting Financial Institution.



9. Expand the CRS Report Folder (using the "+" icon) and select the **Edit** link beside the Reporting FI Information form to enter data.



10. You will be presented with the editable **Reporting FI Information** form for data entry. The image below shows a sample Reporting FI Information form.



11. Complete all required information on the form. Please take note of the following:

    - The **Document Type** field is included in both the Reporting FI Information and Account Information sections of the filing. Allowable entries are New Data, Corrected Data, and Deletion of Data. If you selected a Message Type of "The message contains new information" on the General Information form, all Document Types contained in the filing must be set to "New Data".

        - **Important Note:** The OECD have introduced a fourth document type of "Resend Data", which will be applicable to corrections being sent in response to partner jurisdiction notifications. This will be added to the system at a later date, and more information on this will be included at that time.

    - The **Document Reference ID** is an auto-generated unique ID that must be included for each section. If you overwrite the auto-generated value with an internal reference, the ID must begin with "BM", contain no spaces, and be globally unique.

    - The **Reporting FI Name** and **Address** fields will be pre-populated based on the information stored in your Financial Institution Profile (which was submitted as part of your enrolment). If this name or address is incorrect, you must update the pre-populated data before submitting the form.

    - The **Identification Number** field on this form will prepopulate with the identification number assigned to you during the enrolment process

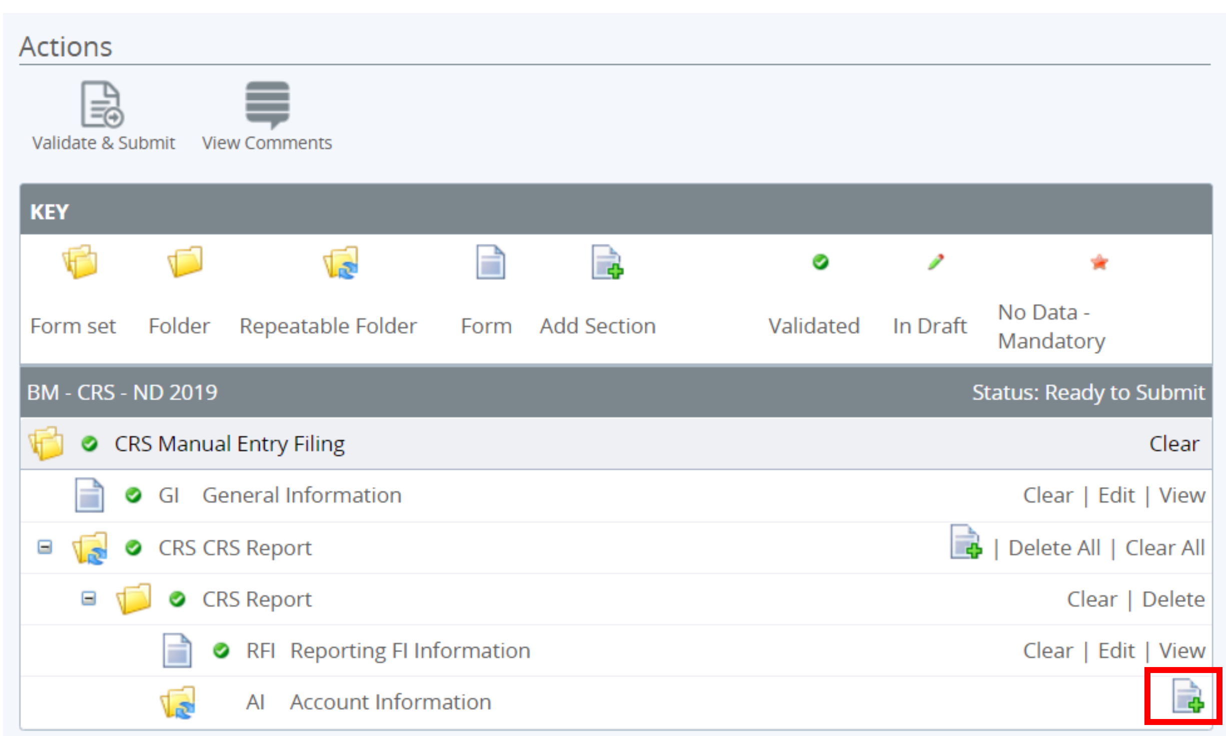
12. Select "**Validate & Save**" to proceed.

    - **Important Note:** If you are alerted to any errors on the form, these must be corrected before proceeding, or selecting "Save as Draft" allows you to bypass on-form validation and save the data as draft until your return.

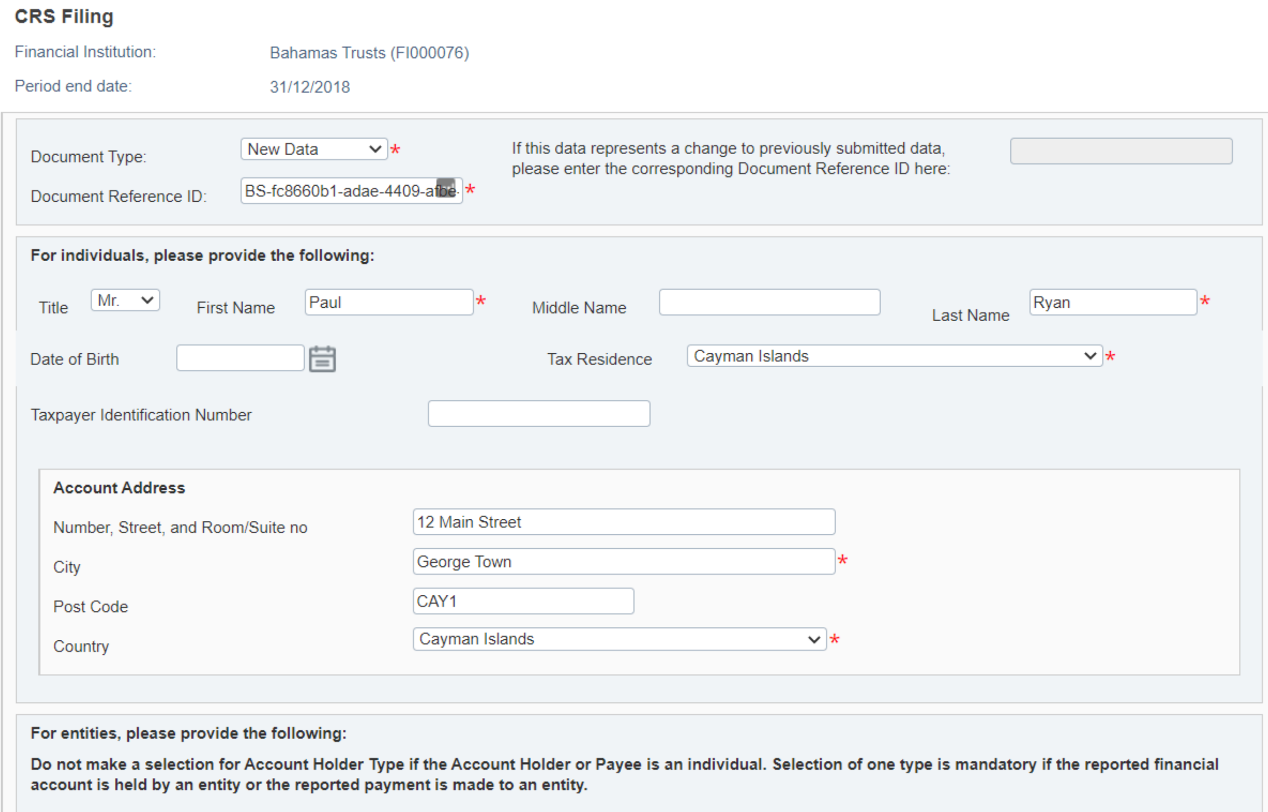
13. Select the **Add Section** icon next to the Account Information section to add an account.

    - **Important Note:** A separate Account Information form will be required for each reportable account being submitted for the receiving country. When returning to the Draft Filings page, you will need to expand the CRS Report Folder (using the "+" icon) to see all forms.

    - **Important Note:** If this is a Nil filing, no reports should be added. Please see *Section 4.4 - Submitting a Nil CRS filing* for more information on this process.



14. You will be presented with the editable form for data entry. The fields related to information on the account holder are shown below.



CRS Filing

Financial Institution: Bahamas Trusts (FI000076)

Period end date: 31/12/2018

Document Type: New Data *

If this data represents a change to previously submitted data, please enter the corresponding Document Reference ID here:

Document Reference ID: BS-fc8660b1-adae-4409-a *

For individuals, please provide the following:

Title Mr. First Name Paul * Middle Name Last Name Ryan *

Date of Birth Tax Residence Cayman Islands *

Taxpayer Identification Number

Account Address

Number, Street, and Room/Suite no 12 Main Street

City George Town *

Post Code CAY1

Country Cayman Islands *

For entities, please provide the following:

Do not make a selection for Account Holder Type if the Account Holder or Payee is an individual. Selection of one type is mandatory if the reported financial account is held by an entity or the reported payment is made to an entity.

15. Complete all required fields as appropriate for the account holder.

16. Guidance for completion of <u>individual account holder information</u>:

    - The **Account Holder Type** must be left blank for individual account holders.

    - The individual **Tax Residence** will be pre-populated with the Receiving Country entered on the General Information form. The tax residence of all individual accounts in the filing <u>must</u> match the reportable jurisdiction selected as the receiving country.

    - The individual **Taxpayer Identification Number** is shown as optional on the form as there are valid scenarios where the TIN may not be available (e.g. the jurisdiction of tax residence does not issues TINs). However, you <u>must</u> ensure that for jurisdictions that DO expect a TIN to be submitted, this is included in the report. Otherwise, you may receive an error notification from the partner jurisdictions requiring a correction. The TIN rules and expected format by jurisdiction can be found here: http://www.oecd.org/tax/automatic-exchange/crs-implementation-and-assistance/tax-identification-numbers/.

17. Guidance for completion of <u>entity account holder information</u>:

    - The **Account Holder Type** must be selected for entity account holders. Allowable values are as follows:

        - CRS Reportable Person
        - Passive Non-Financial Entity that is a CRS reportable person
        - Passive Non-Financial Entity with one or more controlling person that is a reportable person

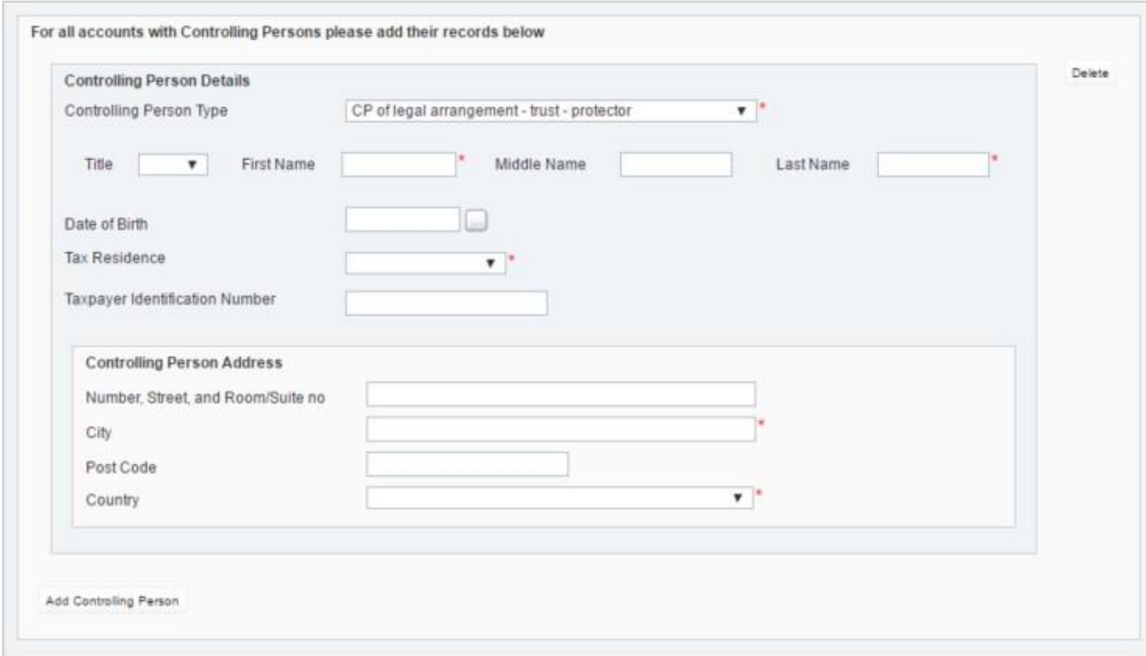
    - The entity **Tax Residence** <u>must</u> match the reportable jurisdiction selected as the receiving country on the General Information form, <u>unless</u> a Controlling Person is being added whose tax residence matches the receiving country.

    - The **Entity Identification Number** is shown as optional on the form as there are valid scenarios where the IN may not be available (e.g. the jurisdiction of tax residence does not issue INs). However, you <u>must</u> ensure that for jurisdictions that DO expect an IN to be submitted, this is included in the report. Otherwise, you may receive an error notification from the partner jurisdictions requiring a correction. The TIN/IN rules and expected format by jurisdiction can be found here: http://www.oecd.org/tax/automatic-exchange/crs-implementation-and-assistance/tax-identification-numbers/.

18. Guidance for the completion of <u>controlling person information:</u>

    - To add a controlling person record for the entity account, select the "**Add Controlling Person**" button.

    - A new section will be added to capture controlling person information, as shown below. This should be done for each controlling person for the entity with a tax residence that matches the receiving country.



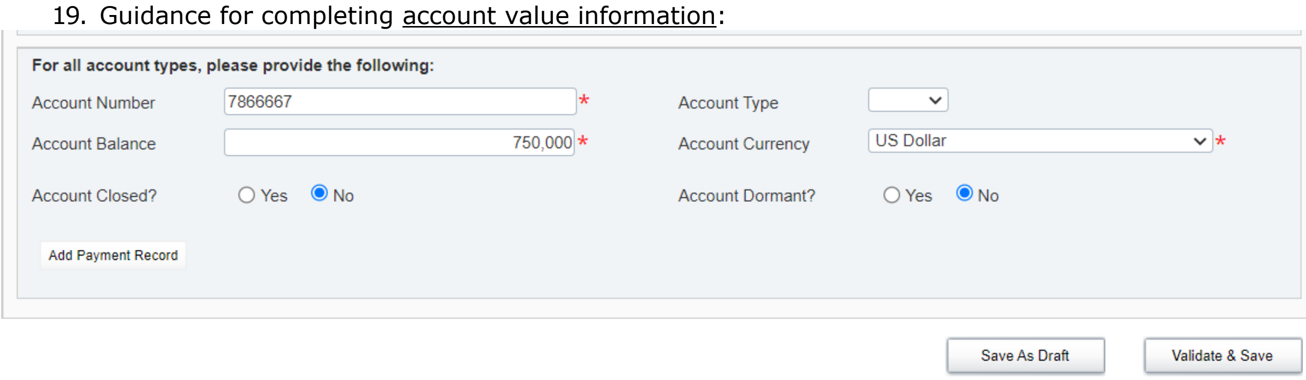
- Controlling persons can only be submitted with the account when the **Account Holder Type** is selected as "Passive Non-Financial Entity with one or more controlling person that is a CRS reportable person". If any other account holder type is selected, the Controlling Person fields will remain disabled.

- The **Controlling Person Type** must be selected, which identifies the role of the controlling person. Available values for CRS are as follows:
  - CP of legal person – ownership
  - CP of legal person – other means
  - CP of legal person – senior managing official
  - CP of legal arrangement – trust – settlor
  - CP of legal arrangement – trust – trustee
  - CP of legal arrangement – trust – protector
  - CP of legal arrangement – trust – beneficiary
  - CP of legal arrangement – trust – other
  - CP of legal arrangement – other – settlor-equivalent
  - CP of legal arrangement – other – trustee-equivalent
  - CP of legal arrangement – other – protector-equivalent
  - CP of legal arrangement – other – beneficiary-equivalent
  - CP of legal arrangement – other – other-equivalent

- The controlling person **Tax Residence** <u>must</u> match the reportable jurisdiction selected as the receiving country in the General Information Form.
  - **Important Note:** If the entity account has controlling persons in multiple jurisdictions, the entity account will need to be submitted separately for each receiving country, with the relevant controlling persons' information included in each.

- The controlling person **Taxpayer Identification Number** is shown as optional on the form as there are valid scenarios where the TIN may not be available (e.g. the jurisdiction of tax residence does not issues TINs). However, you <u>must</u> ensure that for jurisdictions that DO expect a TIN to be submitted, this is included in the report. Otherwise, you may receive an error notification from the partner jurisdictions requiring a correction. The TIN rules and expected format by jurisdiction can be found here: http://www.oecd.org/tax/automatic-exchange/crs-implementation-and-assistance/tax-identification-numbers/

19. Guidance for completing <u>account value information</u>:



- The **Account Number** is mandatory under CRS. The OECD guidance for this field is as follows:

    - Provide the account number used by the financial institution to identify the account. If the financial institution does not have an account number then provide the functional equivalent unique identifier used by the financial institution to identify the account.

    - For example: The account number may be the account number of a Custodial Account or Depository Account; ii) the code (ISIN or other) related to a Debt or Equity Interest (if not held in a custody account); or iii) the identification code of a Cash Value Insurance Contract or Annuity Contract.

    - If exceptionally there is no account numbering system use NANUM for no account number.

- The **Account Type** is optional, and is used to describe the type of account number. Available values are included below. Where an IBAN or ISIN is available, it should be provided in the correct format and the applicable account number type should be selected.

    - IBAN - International Bank Account Number (follows a known structure)

    - OBAN - Other Bank Account Number

    - ISIN - International Securities Information Number (follows a known structure)

    - OSIN - Other Securities Information Number

    - Other - Any other type of account number e.g. insurance contract

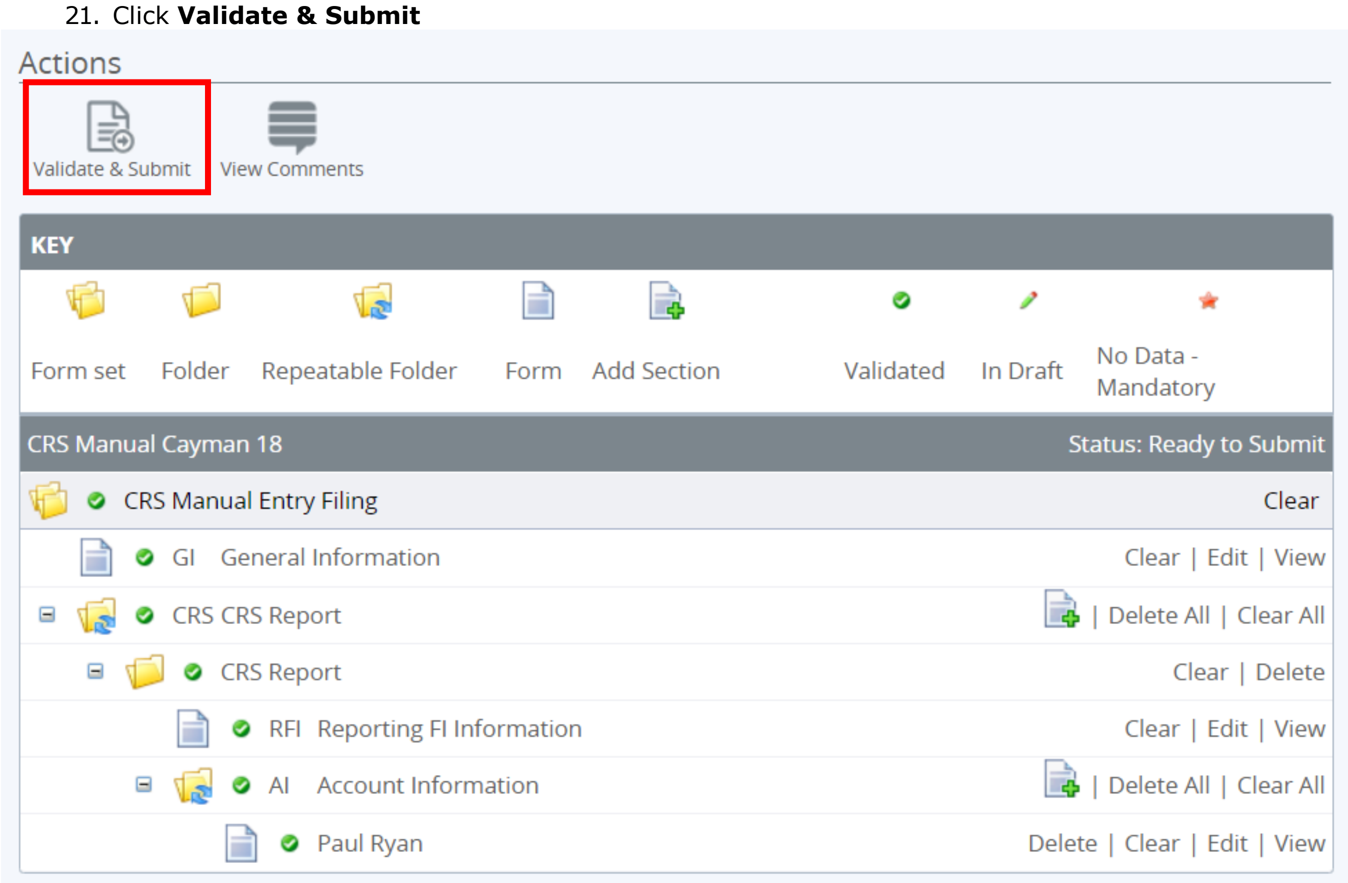
- The **Account Balance** and **Account Currency** must be provided. Negative account balances are not allowed, and must be reported as 0.00.

- The Account can also be specified as **Account Closed** or **Account Dormant**. Closed accounts must have a zero (0.00) balance.

- Select the "**Add Payment Record**" button to record one or more payments on the reported account, including the payment type, currency, and amount. Records can be added or deleted as required.

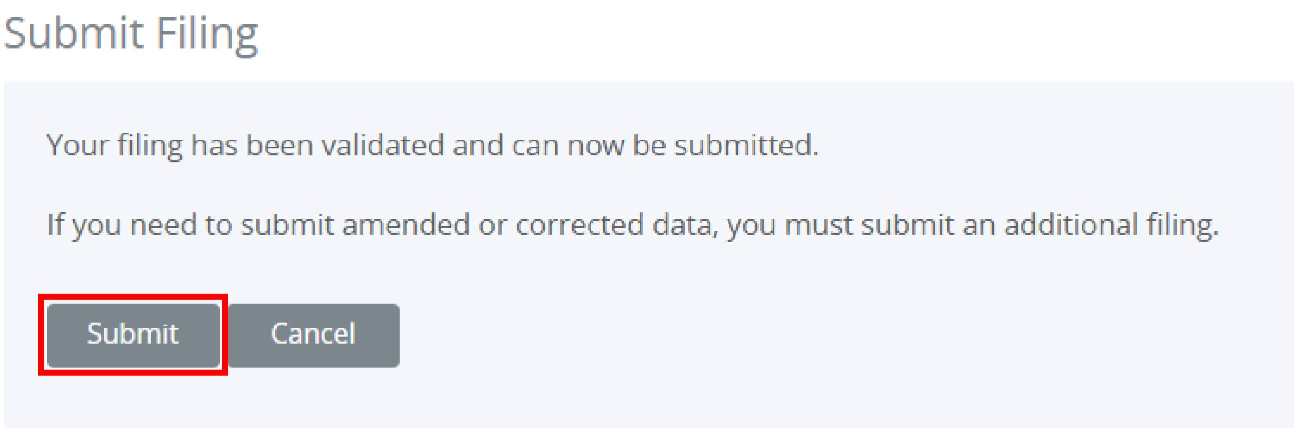
20. Once the **General Information** Form, **Reporting Information** Form, and all required Account Information forms within the filing are complete and in a **Validated** status (indicated by a green check mark icon) you must proceed to submitting the filing.

21. Click **Validate & Submit**



22. If there are validation issues with your filing, you will be notified on the page. See *Section 5 - Correcting CRS validation issues prior to submission* for more information on the process to follow if any validation issues are present.

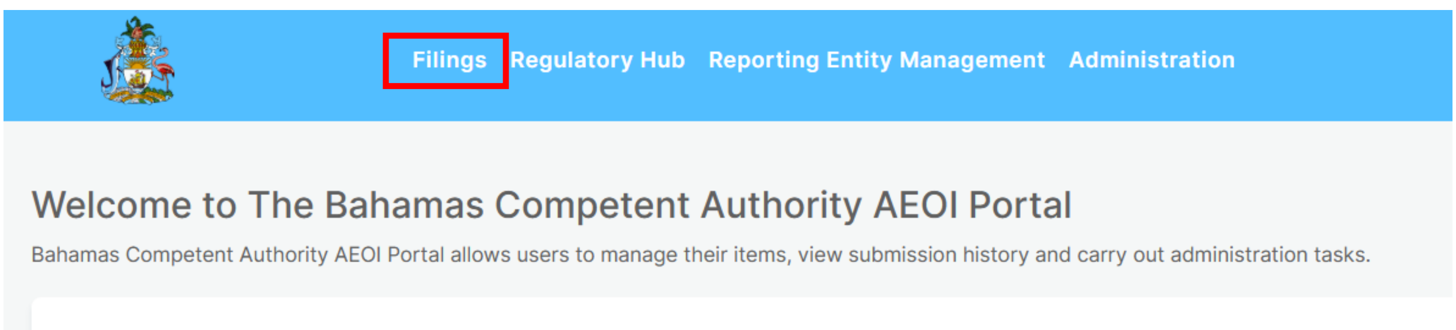
23. If there are no validation issues with your filing, you will be presented with the **Submit Filing** page. Select **Submit** to confirm submission.



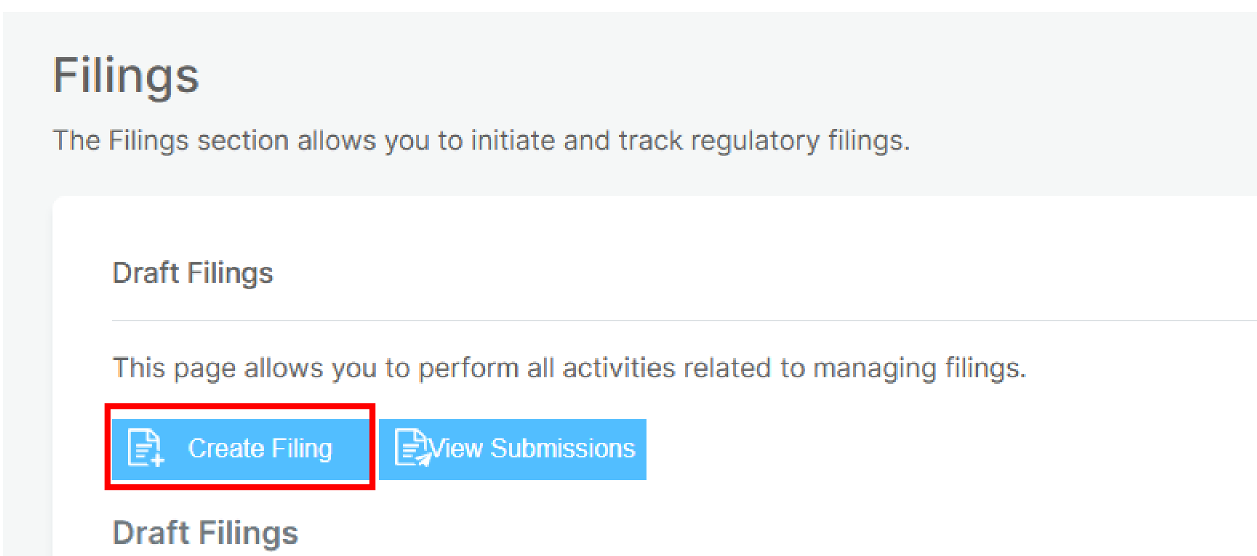
24. Once your filing is successfully submitted with no errors, you will receive a system-generated email notifying you of the successful submission.

4.4 Submitting a CRS Nil Filing

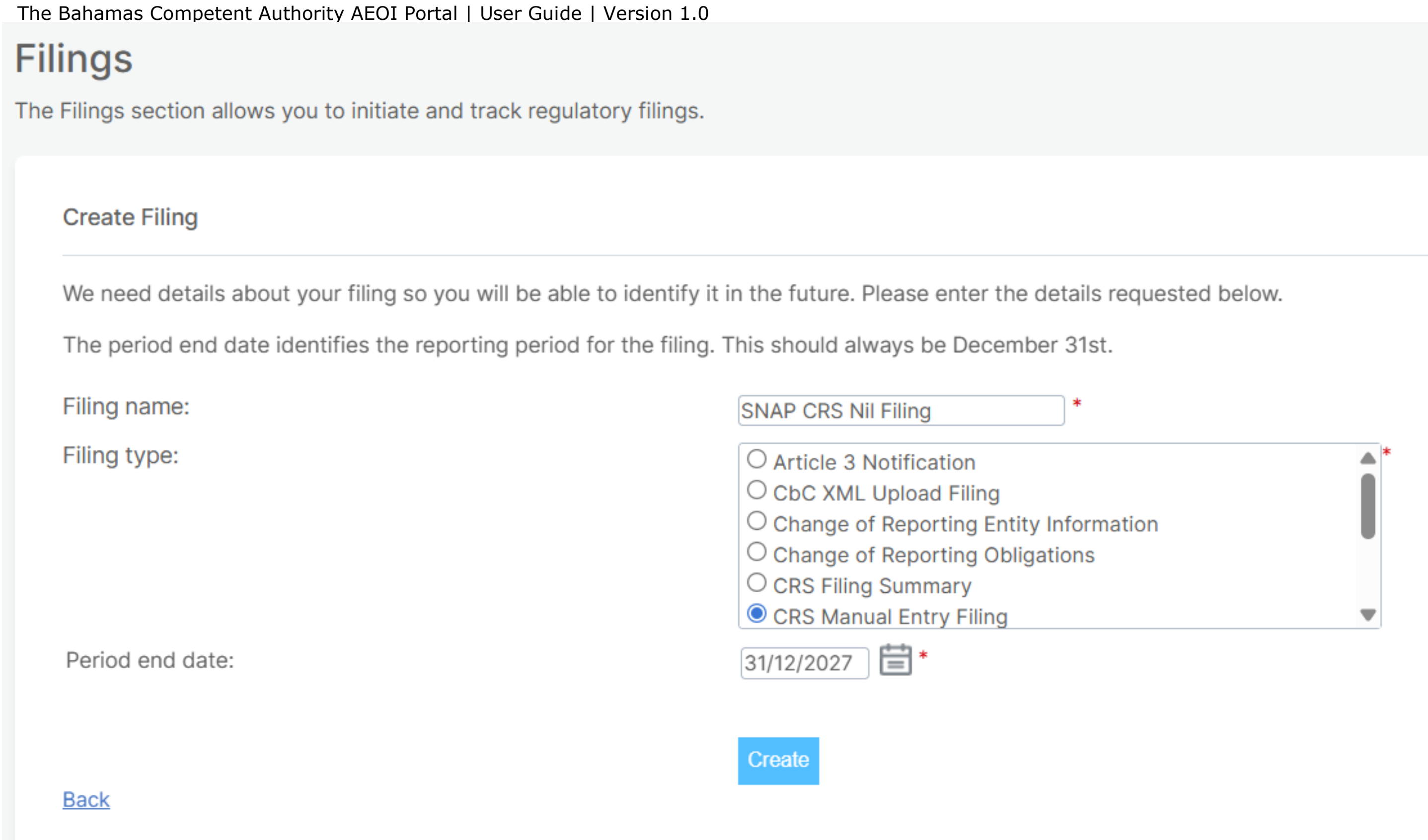
To submit a CRS Nil Filing, create filing in Portal. Click **Filings**.



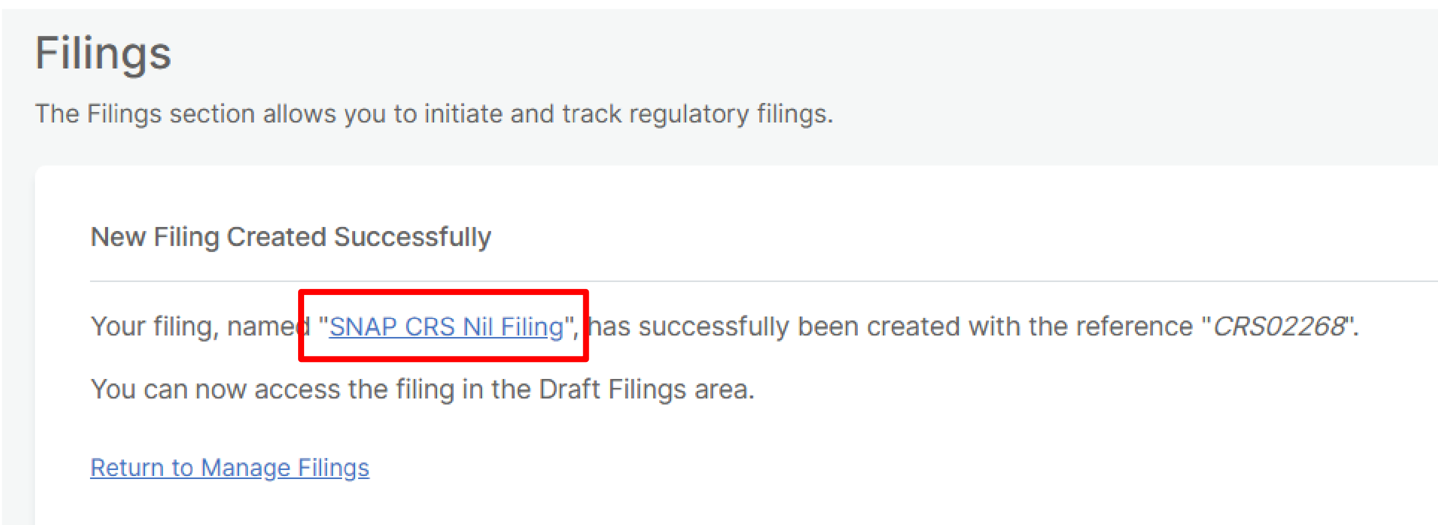
Click **Create Filing**



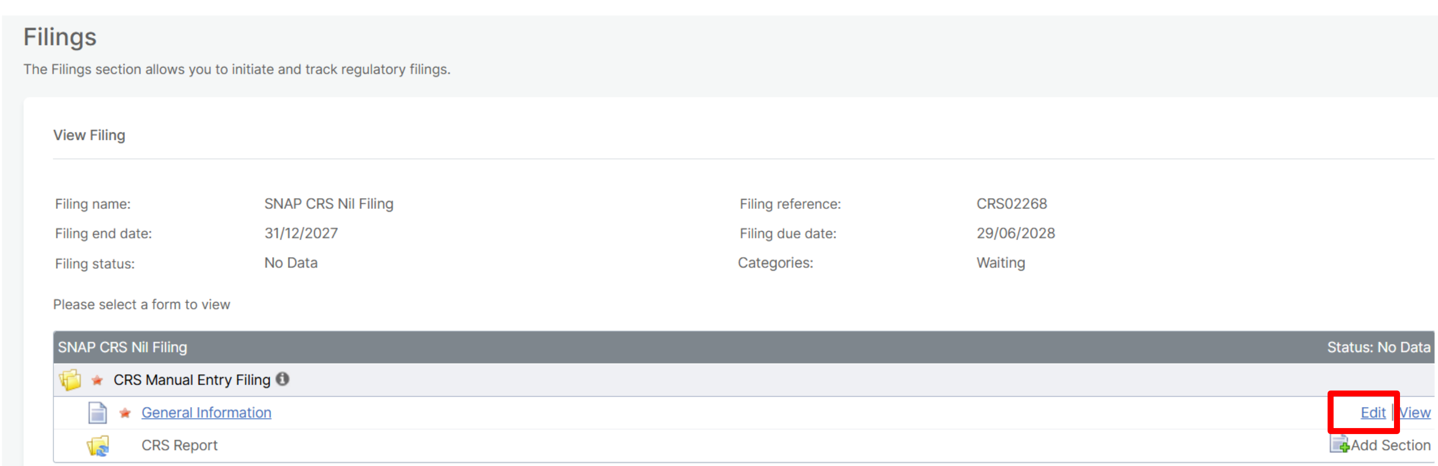
Enter **Filing Name**, Select **CRS Manual Entry Filing**. Enter **Period End Date.**



Click Filing Name.

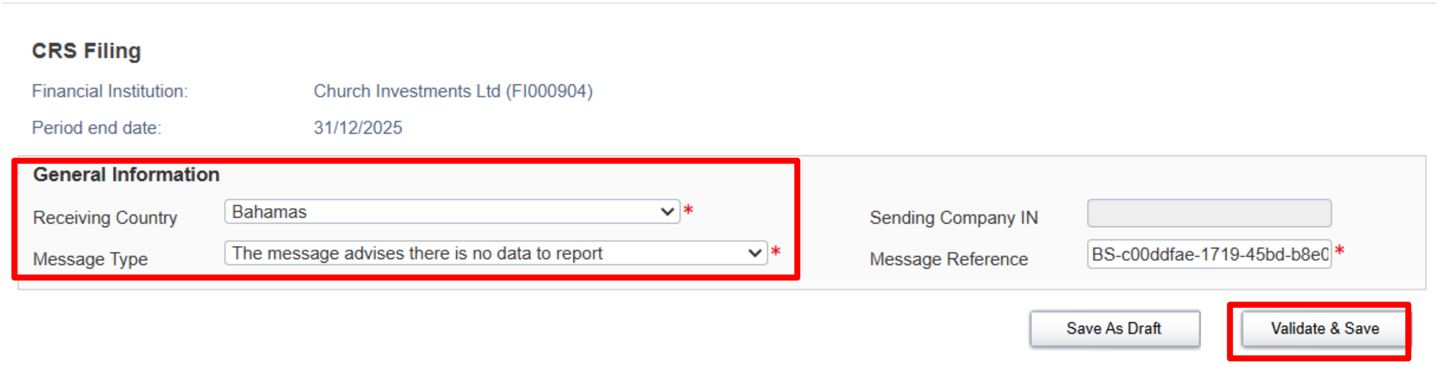


Click **Edit** for General Information



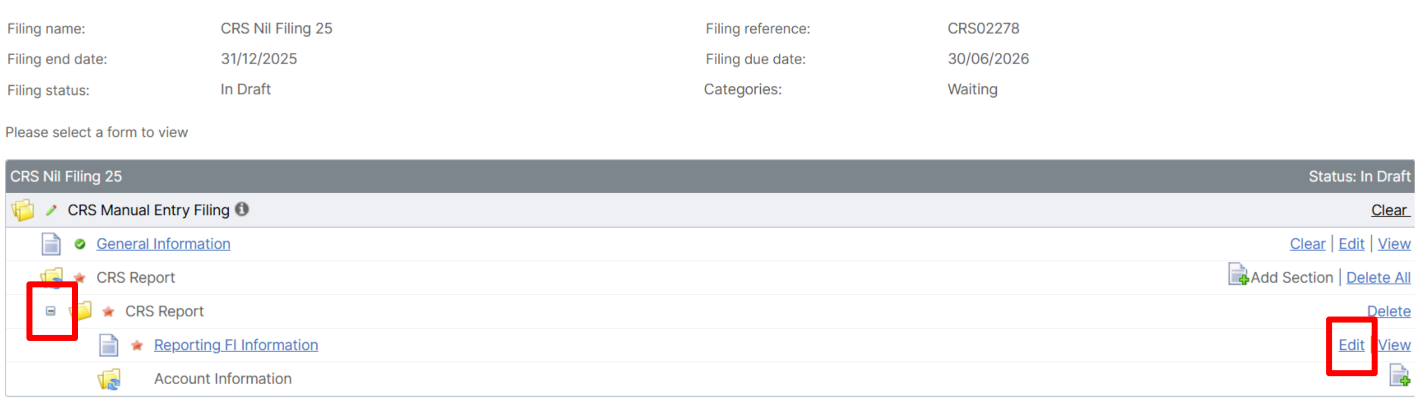
Select **Bahamas** as Receiving Country. Select The message advises there is no data to report as **Message Type**.

Click **Validate & Save**.

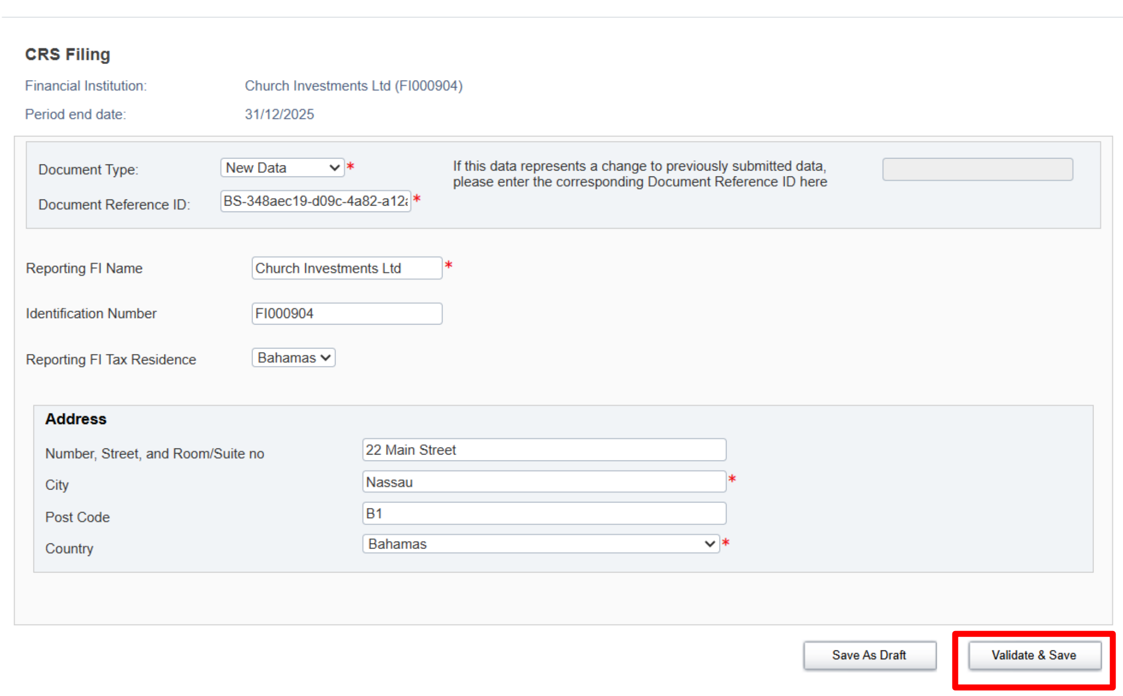


Click **Add Section**

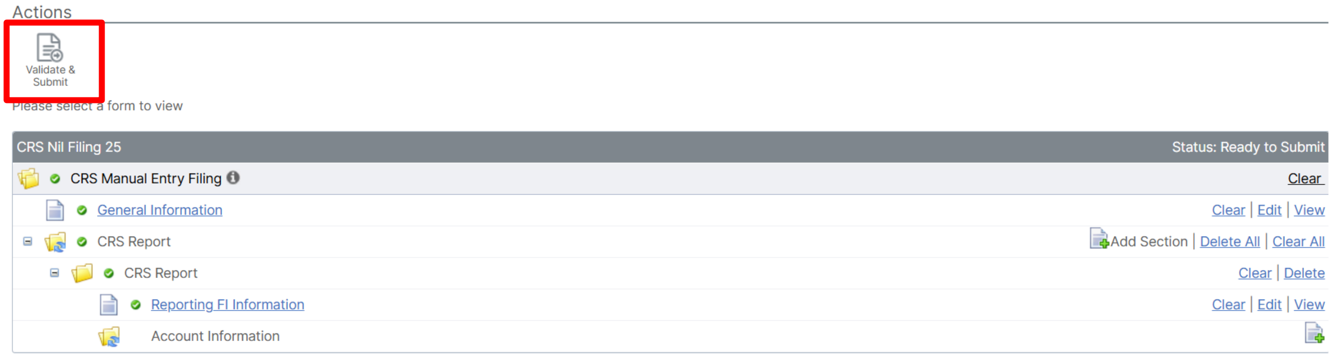
Expand **CRS Report** by clicking **+** . Click **Edit** for **Reporting FI Information**



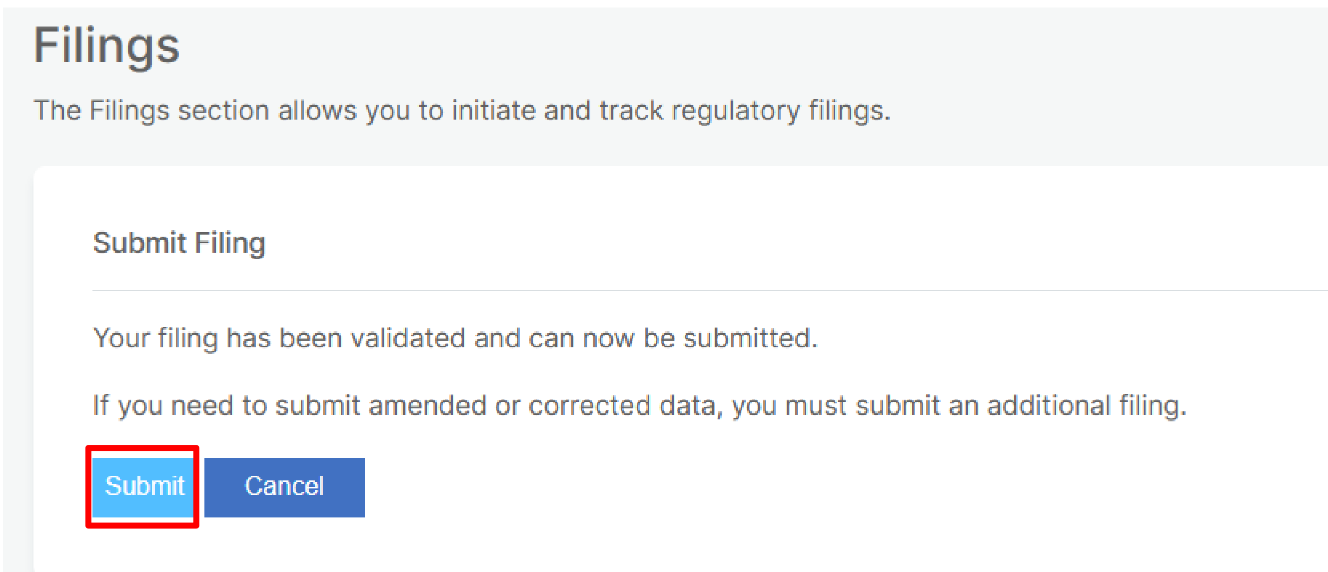
Click **Validate & Save**



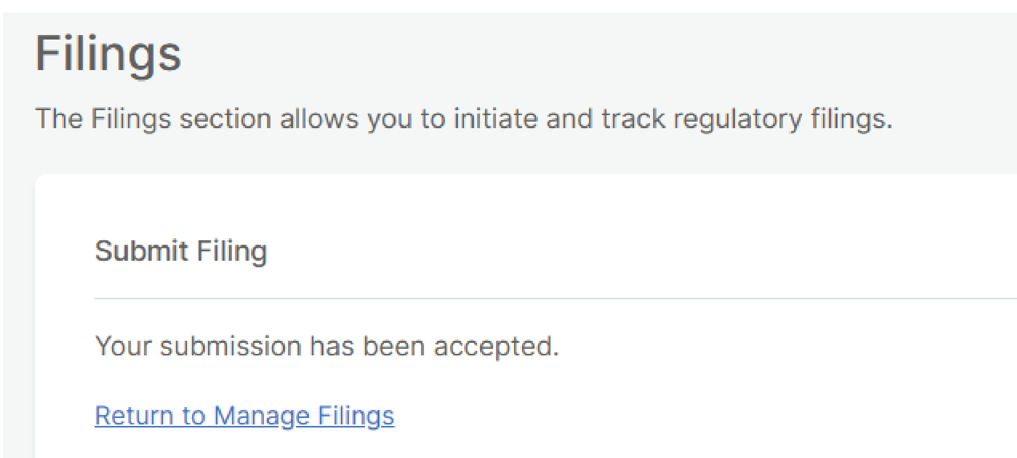
Click **Validate & Submit**



Click **Submit**

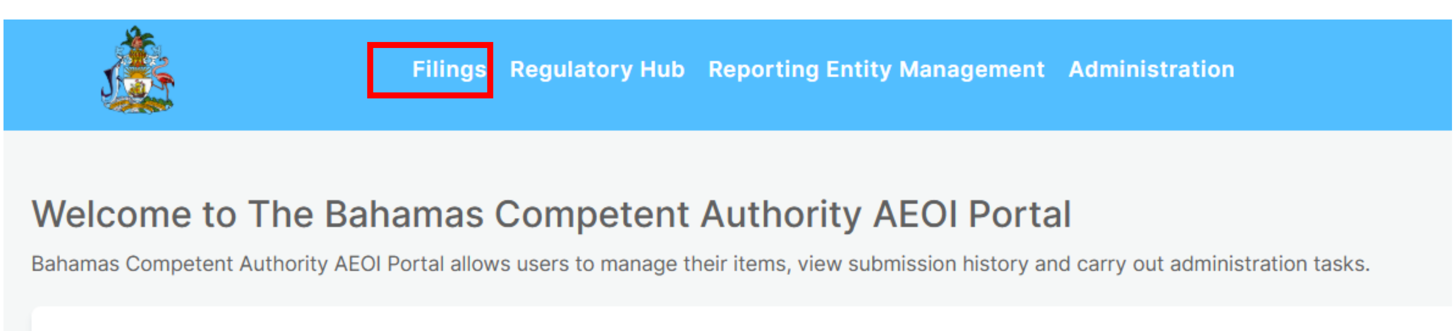


Filing is now submitted to competent authority

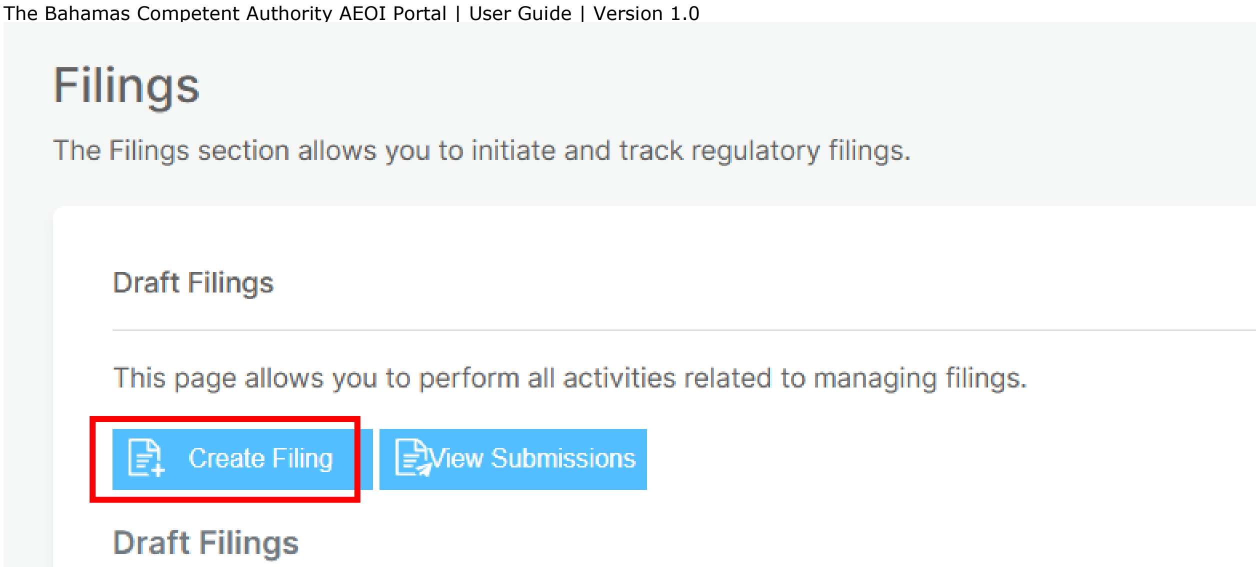


4.5 Submitting CRS Undocumented Accounts

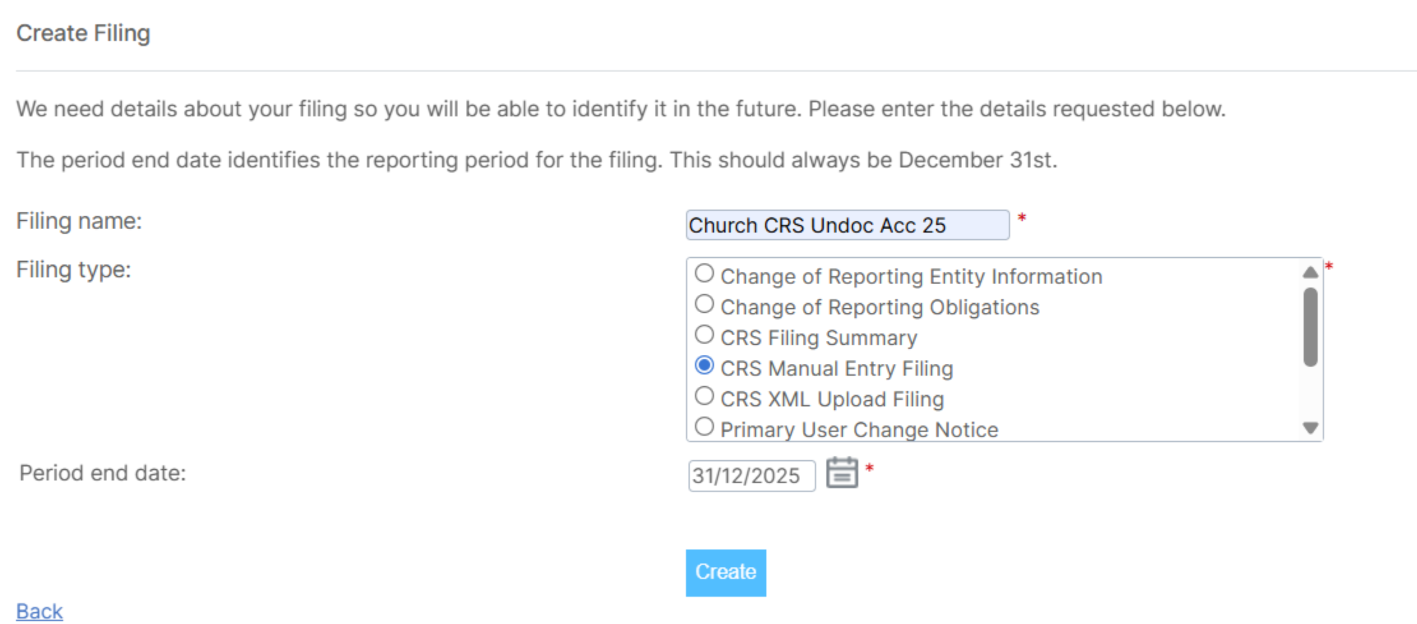
To submit CRS Undocumented Accounts, create filing in Portal. Click **Filings**.



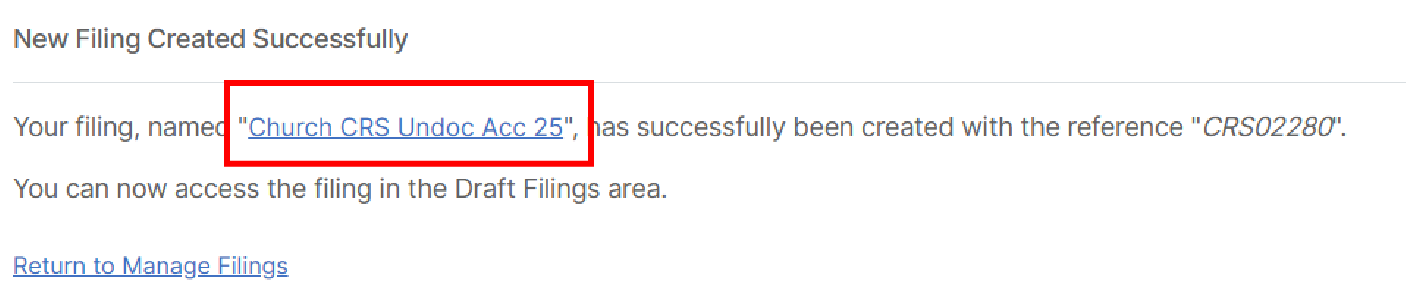
Click **Create Filing**



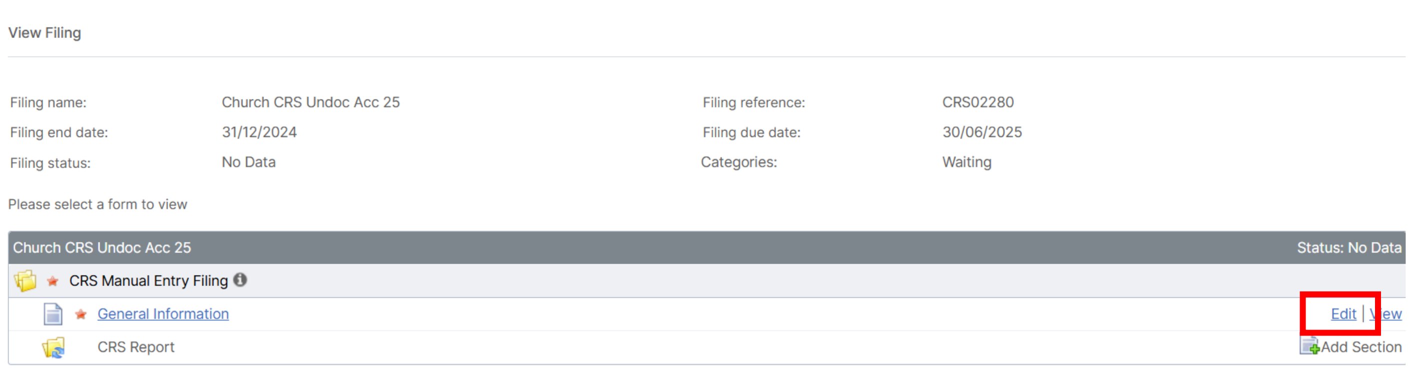
Enter **Filing Name**, Select **CRS Manual Entry Filing**. Enter **Period End Date.** Click **Create.**



Click Filing Name

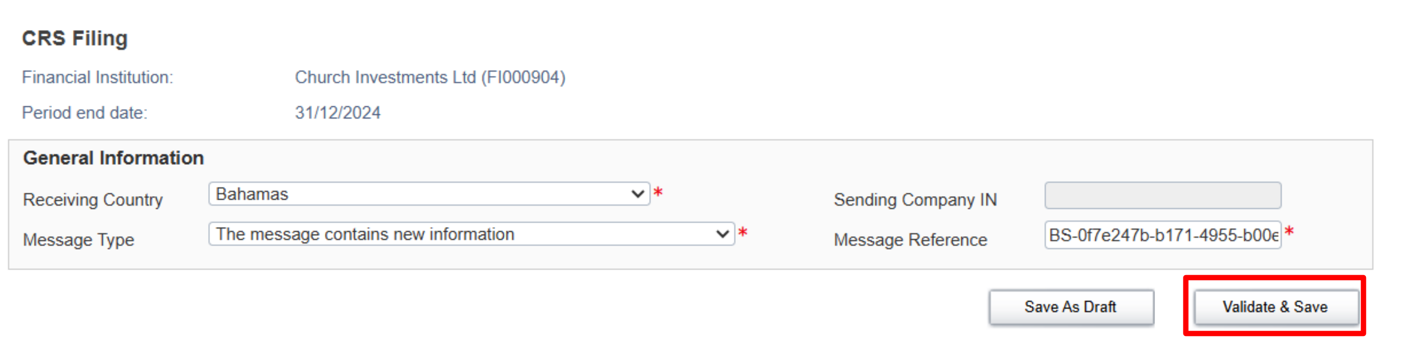


Click **Edit** for General Information



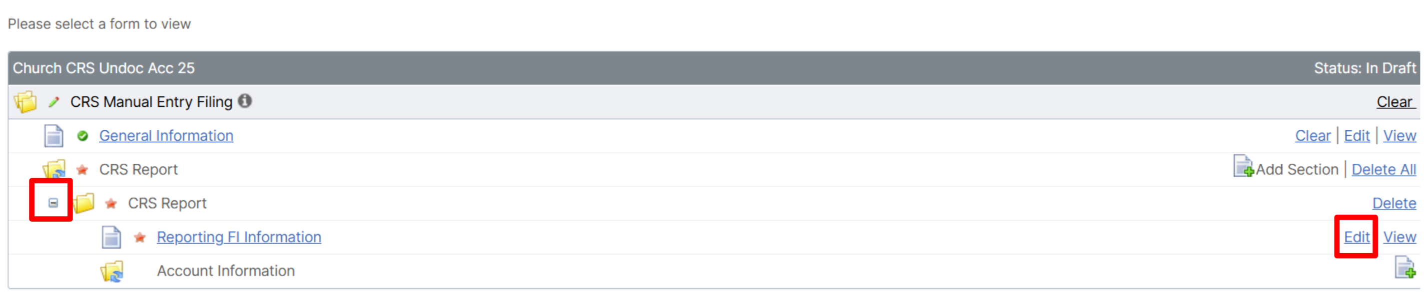
Select **Bahamas** as **Receiving Country.** Select **The message contains new information** for **Message Type.**

Click **Validate & Save**.
Click

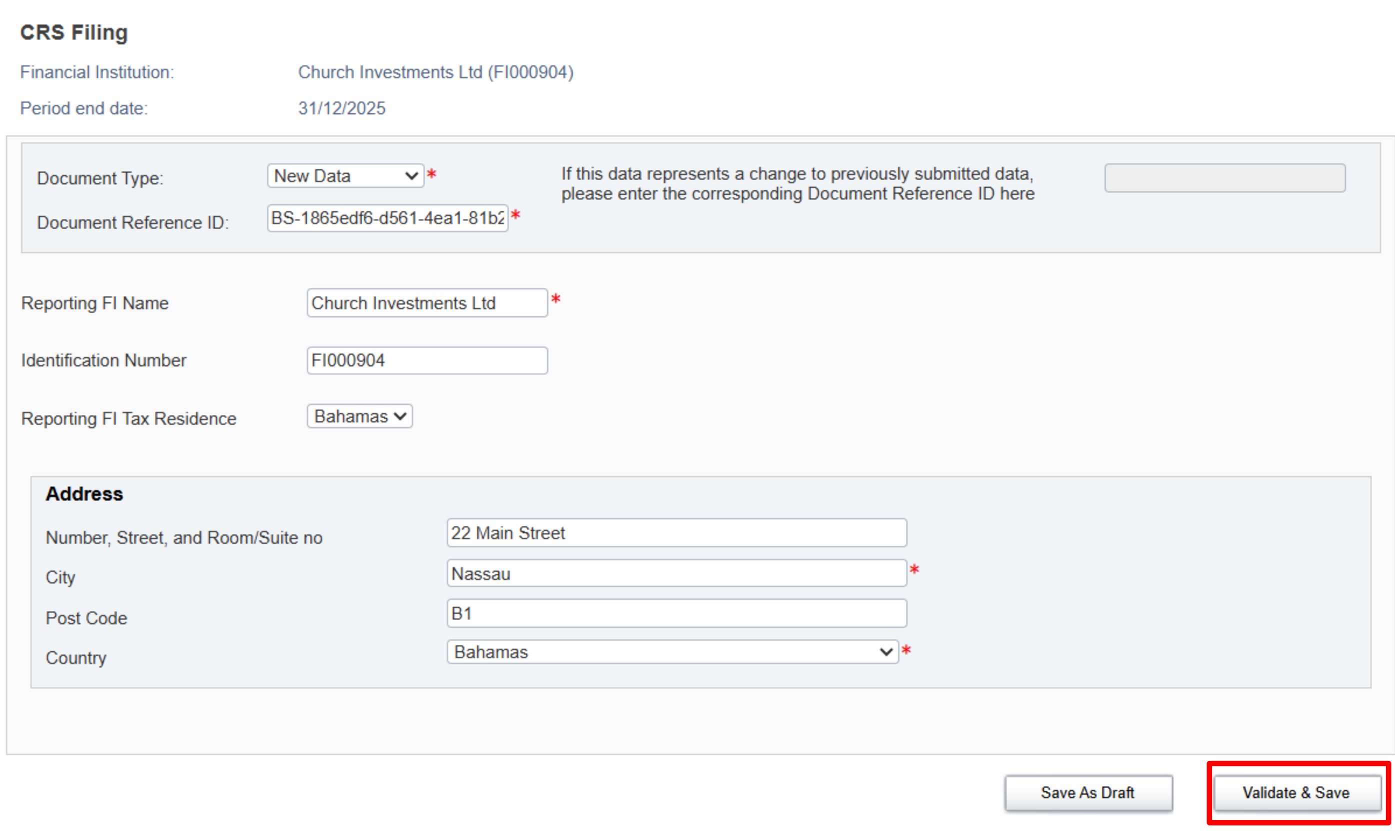


Click **Add Section**.

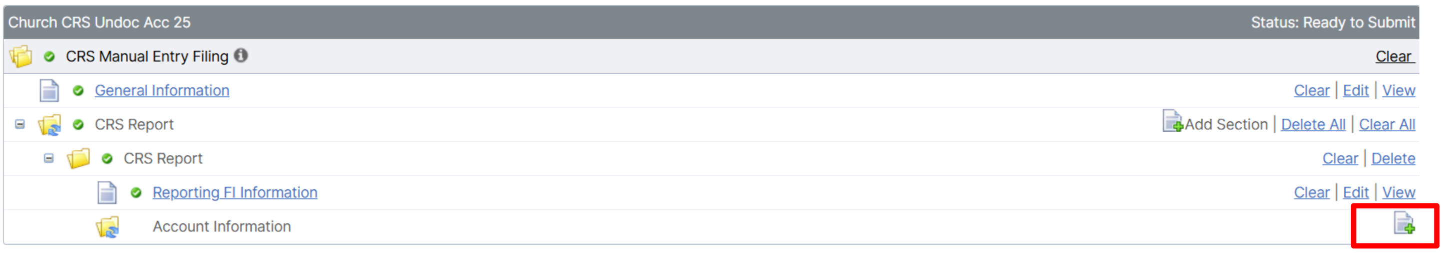
Expand **CRS Report**. Click **Edit** for **Reporting FI Information**.



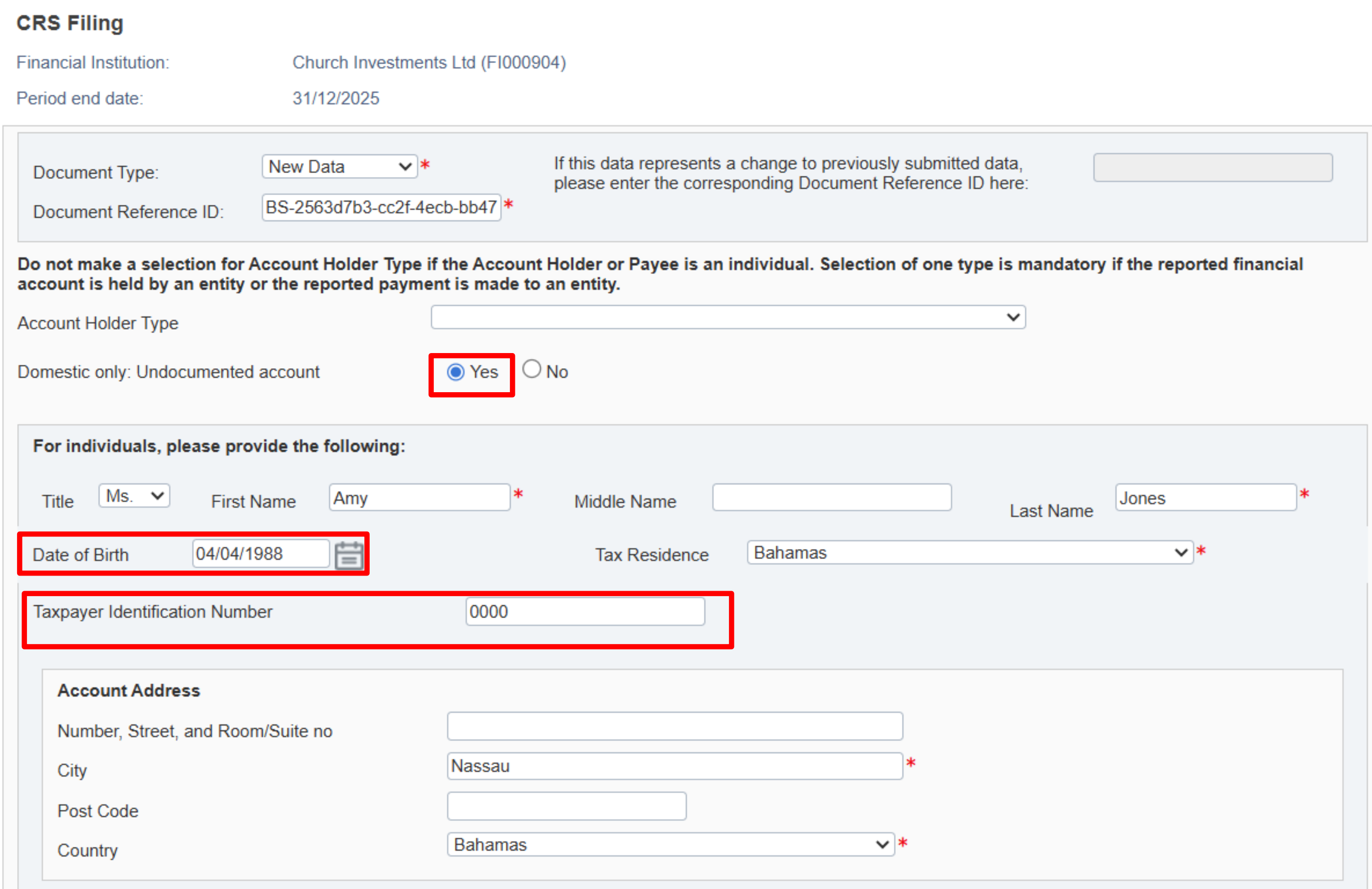
Click **Validate & Save**



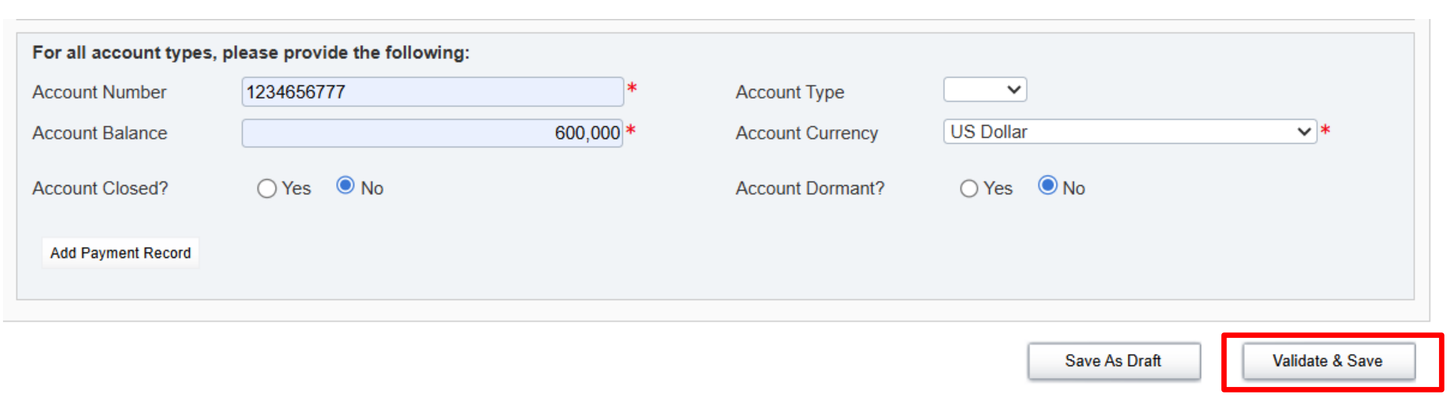
Click **+** for **Account Information**



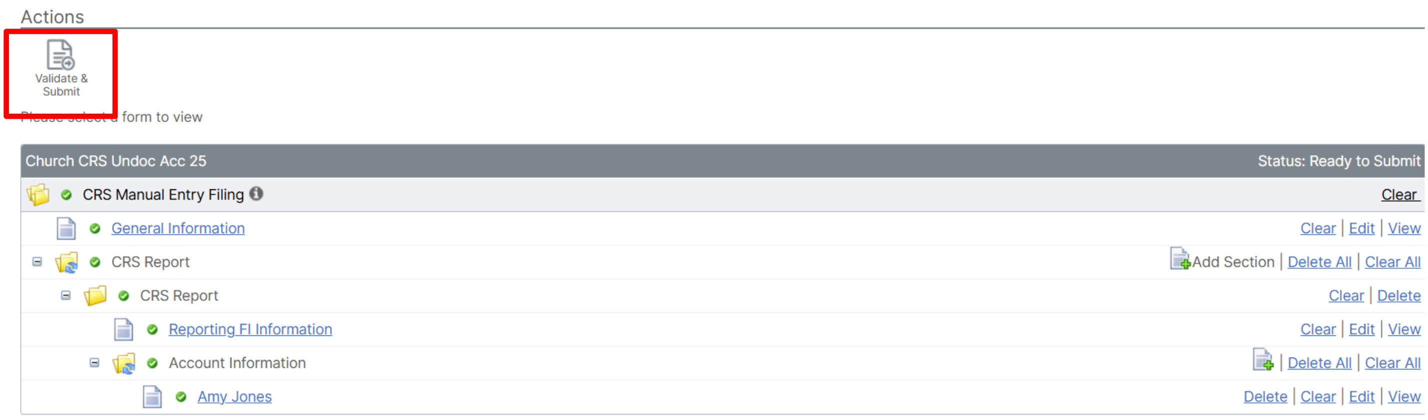
The account holder information should be completed based on whatever information is on hand. Select **Yes** for **Domestic Only: Undocumented account.** Please enter **Date of Birth, TIN** and all mandatory fields**.**



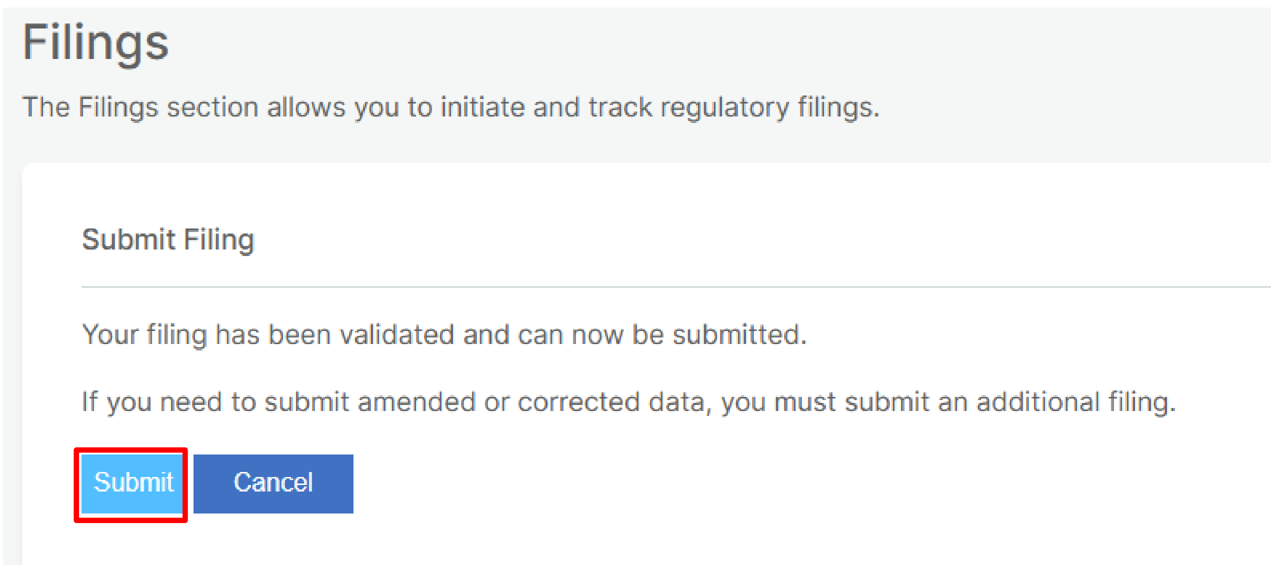
Enter account information. Click **Validate & Save**.

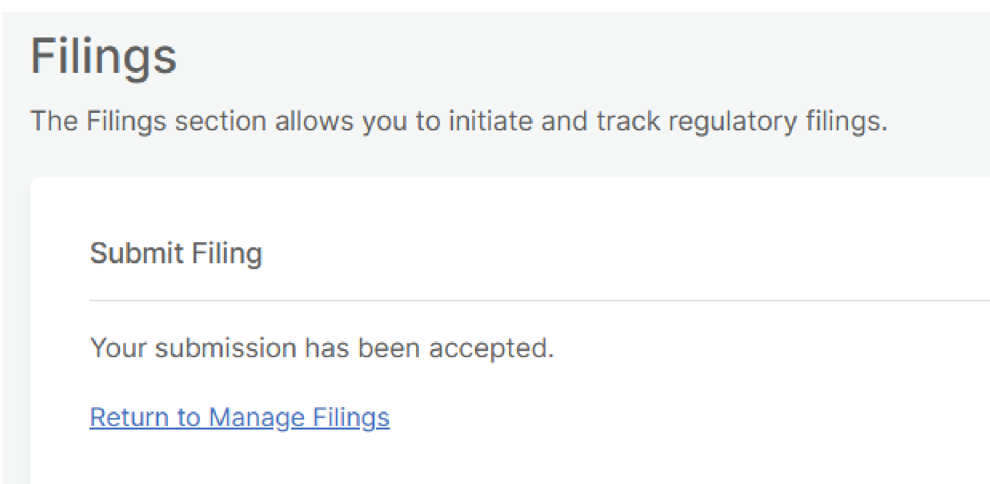


Click **Validate & Submit**



Click **Submit**



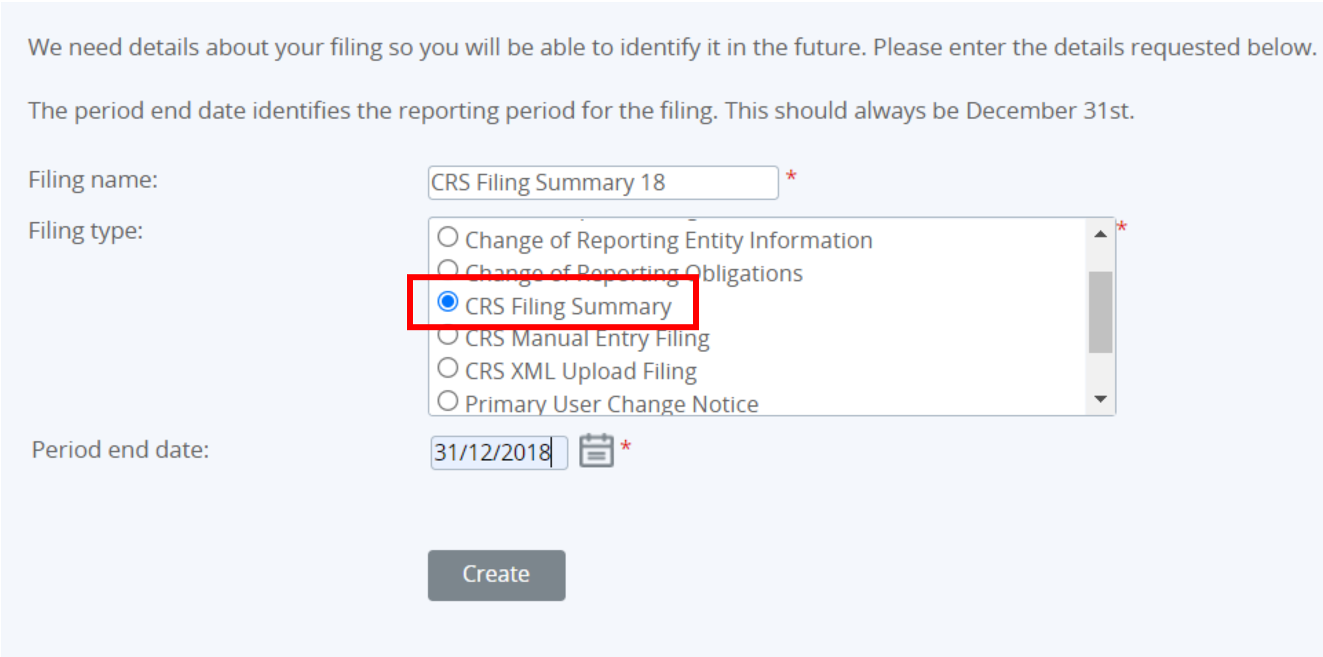


4.6 Submitting a CRS Filing Summary

Once all CRS Report have been submitted each Financial Institution is required to confirm that their reporting is complete by submitting a CRS Filing Summary.

1. Navigate to the **Create Filing** screen using the menu at the top left of the screen. Select **Manage Filings** > **Create Filing**, as shown in the image below.

2. You will be presented with the **Create Filing** page, as shown in the image below.



3. Enter a **Filing name** that is meaningful to you.

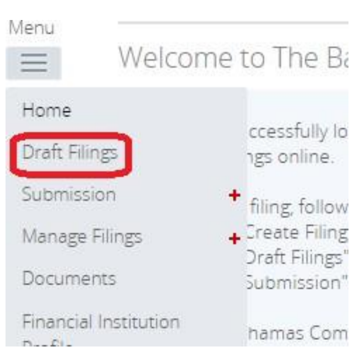
4. Select the **Filing type** that you want to complete. In this case it will be CRS Filing Summary

5. Enter the **Period end date** for the filing.

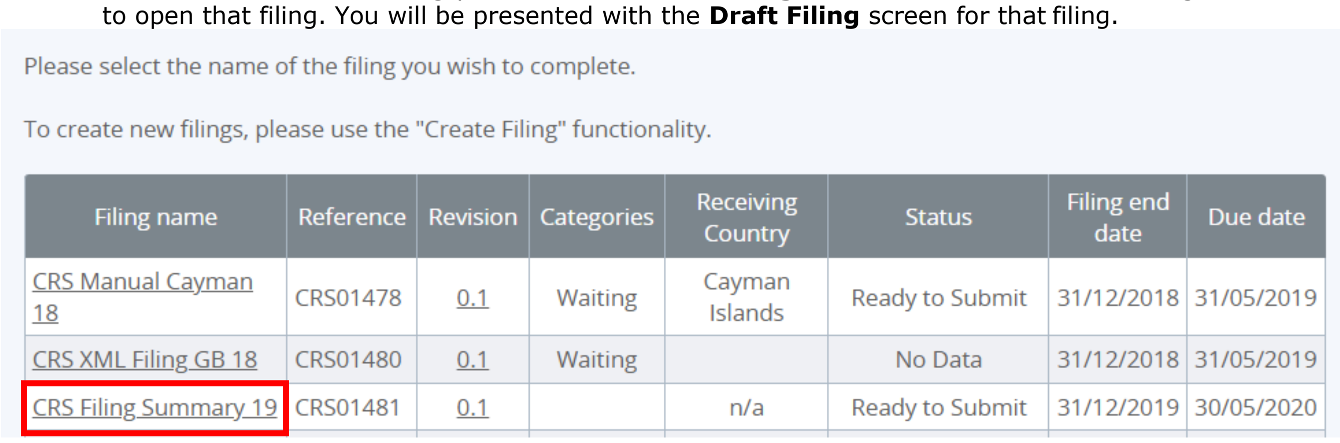
   - **Important note:** The period end date is the last day of the reporting period (the calendar year). For CRS, this date must **always** be December 31st. Failure to select December 31st will result in an error being displayed on screen.

6. Select the **Create** button to complete the creation of your filing and make it available to enter or upload data.

7. Navigate to the **Draft Filings** screen using the menu at the top left of the screen to view filings that you have created but not yet submitted.



8. Select the name of the filing you created from the **Filing name** column of the Draft Filings table to open that filing. You will be presented with the **Draft Filing** screen for that filing.

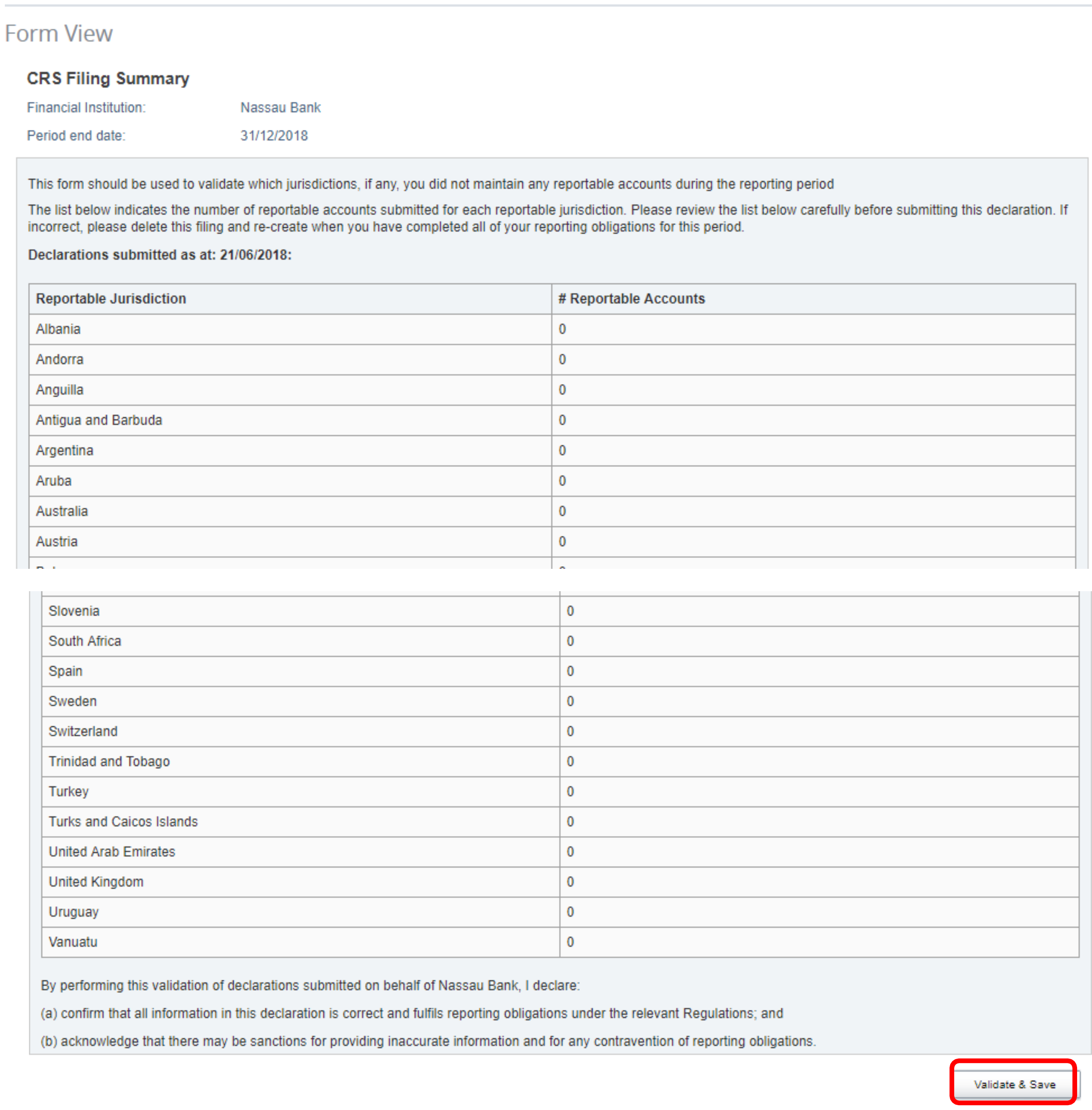


Please select the name of the filing you wish to complete.

To create new filings, please use the "Create Filing" functionality.

Filing name	Reference	Revision	Categories	Receiving Country	Status	Filing end date	Due date
CRS Manual Cayman 18	CRS01478	0.1	Waiting	Cayman Islands	Ready to Submit	31/12/2018	31/05/2019
CRS XML Filing GB 18	CRS01480	0.1	Waiting		No Data	31/12/2018	31/05/2019
CRS Filing Summary 19	CRS01481	0.1		n/a	Ready to Submit	31/12/2019	30/05/2020

9. Select **Edit** and you will be presented with a summary table of all the reportable accounts submitted for each jurisdiction. Once you have reviewed and are happy with the information presented hit "**Validate & Save**"


Form View

CRS Filing Summary

Financial Institution: Nassau Bank

Period end date: 31/12/2018

This form should be used to validate which jurisdictions, if any, you did not maintain any reportable accounts during the reporting period

The list below indicates the number of reportable accounts submitted for each reportable jurisdiction. Please review the list below carefully before submitting this declaration. If incorrect, please delete this filing and re-create when you have completed all of your reporting obligations for this period.

Declarations submitted as at: 21/06/2018:

Reportable Jurisdiction	# Reportable Accounts
Albania	0
Andorra	0
Anguilla	0
Antigua and Barbuda	0
Argentina	0
Aruba	0
Australia	0
Austria	0
Slovenia	0
South Africa	0
Spain	0
Sweden	0
Switzerland	0
Trinidad and Tobago	0
Turkey	0
Turks and Caicos Islands	0
United Arab Emirates	0
United Kingdom	0
Uruguay	0
Vanuatu	0

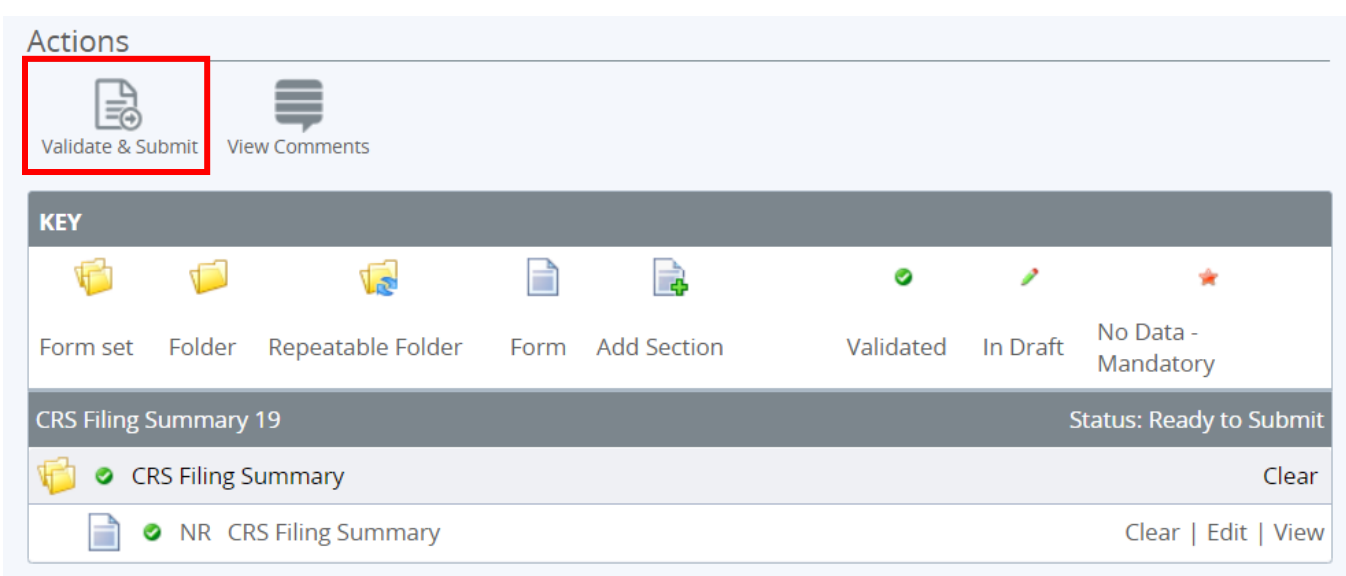
By performing this validation of declarations submitted on behalf of Nassau Bank, I declare:

(a) confirm that all information in this declaration is correct and fulfils reporting obligations under the relevant Regulations; and

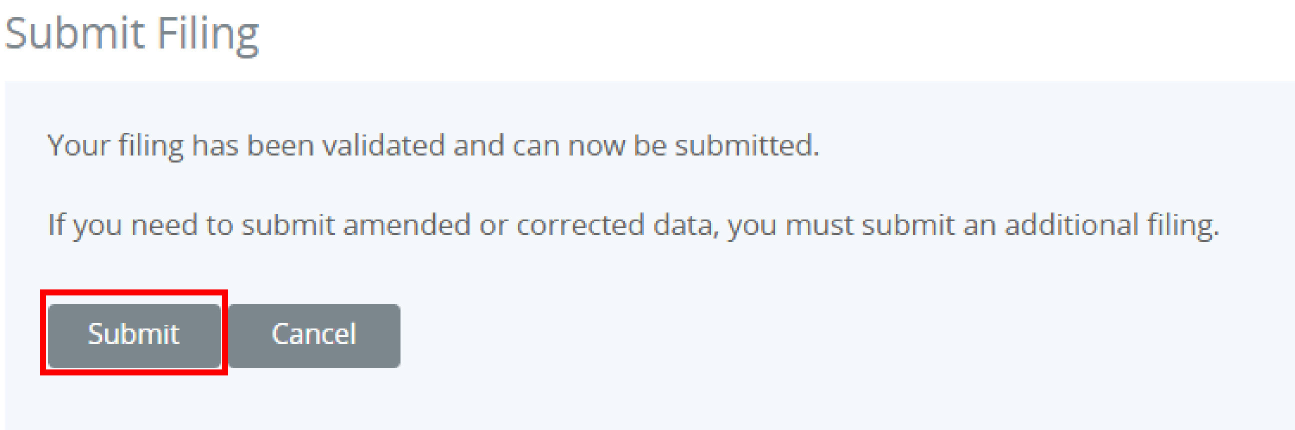
(b) acknowledge that there may be sanctions for providing inaccurate information and for any contravention of reporting obligations.

Validate & Save

10. Click **Validate & Submit**



11. If there are no validation issues with your filing, you will be presented with the **Submit Filing** page. Select **Submit** to confirm submission.



12. Once your filing is successfully submitted with no errors, you will receive a system-generated email notifying you of the successful submission. Important to note that there cannot be CRS filings in the Draft filings when completing a filing summary.

5 Correcting CRS validation issues prior to submission

5.1 Summary of CRS validation rules

The below tables detail the full list of validation rules that will be applied to CRS filings submitted in **The Bahamas Competent Authority AEOI Portal**, in addition to standard validation against the OECD CRS XML Schema v.2.0. The validation rules have been separated into the following tables for ease of reference:

- General Validation
- Reporting FI Information Validation
- Account Information Validation
- Corrected Filings Validation

The Rule Name and Problem Message shown below are shown in the portal when an error is encountered, while the comments in the "Additional Comments" column are only intended to provide further clarification and guidance, where applicable.

It should also be noted that some of these errors are only applicable to the XML Upload filing. This is indicated in the "Applicable to" column.

For the Manual Entry filing, some validation is executed upon selecting the "Validate & Save" button on the individual forms, while other validation is executed when selecting the 'Validate' link on the Validate & Submit page. The below errors may be shown on either page.

General Validation			
Rule Name	**Problem Message**	**Applicable to**	**Additional Comments**
Account Report check	Account Report can only be omitted if the Reporting FI is being corrected/deleted or, in the case of domestic reporting, if there is nil reporting. If the Reporting FI indicates new data or resent, the Account Report must be provided.	XML Upload and Manual Entry	
DocRefId format check	For non-domestic reporting, the document reference ID field must be in the following format: The first two character must correspond to the sending jurisdiction country code, the next set of characters must be a unique reference.	XML Upload and Manual Entry	
Document type check	The only document type values allowed for CRS reporting are OECD0 – Resent Data, OECD1 - New Data, OECD2 - Corrected Data or OECD3 - Deletion of Data.	XML Upload	*Note that this error may be shown as an XML enumeration constraint.*
Domestic Nil reporting check	The message type "The message advises there is no data to report" can only be used for domestic reporting.	XML Upload and Manual Entry	*The receiving country must be "Bahamas" if using message type "The message advises there is no data to report".*
Period end date matches Reporting period?	The period end date <XXXX> specified during filing creation must match the reporting period on submission.	XML Upload	*If the period end date selected when creating the filing is incorrect, you must create a new filing with the correct end date and upload yourfile.*
Pool Report Check	Pool Reporting is not applicable to CRS Reporting.	XML Upload	*Note that this error may be shown as an XML structural error.*
Receiving country is not a reportable jurisdiction	Please note <XXXX> is not yet a reportable jurisdiction for CRS	XML Upload	*The list is restricted in the Manual Entry form.*
Reporting Obligations	You are not permitted to submit this filing, as you do not have the relevant Reporting Type marked in your Reporting Obligations. If you are required to submit information to this jurisdiction, please create and submit a "Change of Reporting Obligations" filing."	XML Upload and Manual Entry	*You will get this error if you try to submit a CRS filing but are not enrolled for CRS. You will need to use the 'Change of Reporting Obligations' form to first update your reporting obligations.*
Sending Company IN check	If the CRS report is being used for domestic reporting then a Sending Company IN must be provided.	XML Upload and Manual Entry	
Transmitting Country Check	The value <XX> entered in the Transmitting Country field does not match that of the country being reported to.	XML Upload	*The Transmitting Country must always be "BM"*

General Validation			
Rule Name	**Problem Message**	**Applicable to**	**Additional Comments**
Unique document reference ID for Filing	A duplicate document reference ID has been entered for this filing.	XML Upload and Manual Entry	*All document reference IDs must be globally unique.*
Unique message reference check	The message reference <XXXX> is already in use in another filing.	XML Upload and Manual Entry	*The message reference must be unique.*

Reporting FI Information Validation			
Rule Name	**Problem Message**	**Applicable to**	**Description**
Reporting FI document reference ID spaces check	Please note, the Reporting FI Document Reference ID <XXXX> contains spaces and cannot be submitted	XML Upload and Manual Entry	*Spaces are not allowed in the document reference ID.*
Reporting FI document type does not match filing message type	Please note the document type you specified in the Reporting FI section of the filing does not match the overall message type selected.	XML Upload and Manual Entry	*A) Where a Message Type of "The message contains new information" is selected then all Document types contained within the filing must have a type of "New Data"* *B) Where a message type of "The message contains corrections for previously sent information" is selected then all Document types contained within the filing must have a type of "Resent Data" "Corrected Data" or "Deletion of Data"*
Reporting FI tax residence check	The Tax Residence of the Reporting FI must always match the Transmitting Country.	XML Upload	*This must always be Bahamas (BM).*
Reporting FI Unique Document Reference ID check	Please note the document reference ID <XXXX> found in the Reporting FI section of this filing is already in use in the system.	XML Upload and Manual Entry	*All Document Reference IDs must be globally unique, with the exception of the Reporting FI Document Reference ID being sent with a document type of OECD0 – Resent Data.*

Account Information Validation			
Rule Name	**Problem Message**	**Applicable to**	**Description**
Account balance check	The account balance cannot be less than zero.	XML Upload and Manual Entry	*Under the CRS, an account with a balance or value that is negative must be reported as having an account balance or value equal to zero.*
Account Closed	Must specify true or false in the Account Closed element.	XML Upload	*If the Account Closed element is included in an uploaded XML, it must contain either True or False.*
Account holder unique Document Reference ID check	Please note the document reference ID <XXXX> found in the account holder section of this filing is already in use in the system.	XML Upload and Manual Entry	*All Document Reference IDs must be globally unique.*
Account Report document reference ID spaces check	Please note, the Account Report document reference ID <XXXX> contains spaces and cannot be submitted	XML Upload and Manual Entry	
Account report document type does not match filing type	Please note the document type you specified in the Account Report section of the filing does not match the overall message type selected.	XML Upload and Manual Entry	*A) Where a Message Type of "The message contains new information" is selected then all Document types contained within the filing must have a type of "New Data"* *B) Where a message type of "The message contains corrections for previously sent information" is selected then all Document types contained within the filing must have a type of "Corrected Data" or "Deletion of Data"*
Closed account nil balance check	Please note closed accounts must have a zero balance.	XML Upload and Manual Entry	
Controlling Person Account Holder Nationality	A controlling person must not have a value for nationality as it is not a reportable item in CRS.	XML Upload	*Note that this error may be shown as an XML structural error.*
Birth date check	Date of birth <XXXX> is not in a valid range. Date of birth must be greater than 1900 and not after the current year.	XML Upload and Manual Entry	*Applicable to both the individual account holder date of birth and the controlling person date of birth.*
Controlling person check a)	Please note the account holder type selected requires at least one controlling person to be reported.	XML Upload and Manual Entry	*If you select 'CRS101' or 'Passive Non-Financial Entity with one or more controlling person that is a reportable person' as the account holder type you must include at least 1 controlling person in the account report.*
Controlling person Check (b)	A controlling person may only be submitted when the Account Holder Type is Passive Non-Financial Entity with one or more controlling person that is a Reportable Person.	XML Upload and Manual Entry	*If the account holder type is 'CRS Reportable Peron' (CRS102) or 'Passive Non-Financial Entity that is a CRS Reportable Person' (CRS103), it is not permitted to include a*

Account Information Validation			
Rule Name	**Problem Message**	**Applicable to**	**Description**
			controlling person in the account report.
Controlling person tax residence check	The controlling person tax residence must match the receiving country.	XML Upload and Manual Entry	
Deletion of Data	The Document Type of the Reporting FI marked for deletion does not match that of the Account Report form.	XML Upload and Manual Entry	*If the Document Type in the Reporting FI Information section is "Deletion of Data", all Account Report forms must also have a Document Type of "Deletion of Data".*
IBAN format check	Please note account number: <XXXX> is not a valid IBAN.	XML Upload and Manual Entry	
Individual Account Holder Nationality	An Individual account holder cannot have a value for nationality as it is not a reportable item in CRS.	XML Upload	*Note that this error may be shown as an XML structural error.*
Individual account holder tax residence	The account holder tax residence must match the receiving country.	XML Upload and Manual Entry	
ISIN format check	Please note account number: <XXXX> is not a valid ISIN.	XML Upload and Manual Entry	
Organisation account holder tax residence	The account holder tax residence must match the receiving country.	XML Upload and Manual Entry	*Note this is only applicable when there is no Controlling Person specified. If a Controlling person is specified (for an account with account type = Passive Non-Financial Entity with one or more controlling persons that is a reportable person), then it is permissible that the organisation account holder tax residence does not match the receiving country.*
Person name type invalid	The name type selected for an individual corresponds to the value not used for CRS i.e. "OECD201 – SMFAliasOrOther.	XML Upload	
Undocumented account check	Where a CRS filing is being used for domestic reporting the filer must indicate if the account being reported upon is undocumented or not.	XML Upload and Manual Entry	

Corrected Filings Validation			
Rule Name	**Problem Message**	**Applicable to**	**Description**
Account holder corresponding document reference ID check	Please note the corresponding document reference you have entered in the account holder section of the filing does not match a previously submitted document reference ID.	XML Upload and Manual Entry	*If a corresponding document reference ID is entered on the account holder form, it must refer to a value contained in the document reference ID field of the account holder form of a previously submitted filing.*
Account Holder Corresponding document reference ID not present	If a document type of corrected data or deletion of data is selected on the account holder form then a corresponding document reference ID must be included in the filing.	XML Upload and Manual Entry	
Corresponding Message Ref ID present in Message Spec	Please note entering a Corresponding Message Reference within the Message Spec section of your filing is prohibited in CRS reporting.	XML Upload	*Note that this error may be shown as an XML structural error.*
Corresponding message reference present in Account Holder Doc Spec	Corresponding Message References are prohibited within the Account Holder Doc Spec group.	XML Upload	*Note that this error may be shown as an XML structural error.*
Corresponding message reference present in Reporting FI Doc Spec	Corresponding Message References are prohibited within the Reporting FI Doc Spec group.	XML Upload	*Note that this error may be shown as an XML structural error.*
Duplicate corresponding document reference check	The same DocRefID cannot be corrected or deleted twice in the same filing. E.g. You cannot repeat an account record to amend two different fields within the record.	XML Upload and Manual Entry	
Number of Account Reports marked for deletion does not match the number in the original filing.	If a deletion filing is being submitted the total number of account reports in the filing must be equal to the number of account reports that was in the original filing that was first submitted.	XML Upload and Manual Entry	
Receiving country in Corrected Filing	The Receiving country in the Filing with CorrDocRefID <XXXX> does not match the Receiving country from its corresponding Filing.	XML Upload and Manual Entry	*When submitting a correction for a previously submitted record, the receiving country of the corrected filing must match the receiving country of the associated original filing.*

Corrected Filings Validation			
Rule Name	**Problem Message**	**Applicable to**	**Description**
Reporting FI Duplicate CorrDocRefId	The CorrDocRefId in this filing is a duplication of a previous one already submitted.	XML Upload and Manual Entry	*If you have already submitted a correction for a record, there should be no future corrections submitted for it, as it will be considered outdated by the previous correction. Future corrections should refer to the DocRefID of the latest message submitted for the record.*
Reporting FI corresponding document reference ID check	Please note the corresponding document reference you have entered in the Reporting FI section of the filing does not match a previously submitted document reference ID.	XML Upload and Manual Entry	
Reporting FI Corresponding document reference ID not present	If a document type of corrected data or deletion of data is selected on the Reporting FI information form then a corresponding document reference ID must be included in the filing.	XML Upload and Manual Entry	
Reporting FI Resend Data Doc Ref Check	The Doc Ref ID specified in the Reporting Information does not match a Doc Ref ID previously submitted.	XML Upload and Manual Entry	*The OECD specifies that when the Reporting FI element has to be resent (used OECD0), the element is identified with the same DocRefID as the immediately preceding version of the Reporting FI element.*

5.2 Viewing and correcting CRS validation issues

If your filing has any of the issues outlined in *Section 5.1 - Summary of CRS validation rules*, you can view the details within the portal in order to determine any corrections that need to be made.

Important Note: only those errors triggered on the "Validate & Submit Filing" page will be saved and accessible using the process below. Errors triggered on the individual forms will not be saved and must be corrected before proceeding past the relevant form.

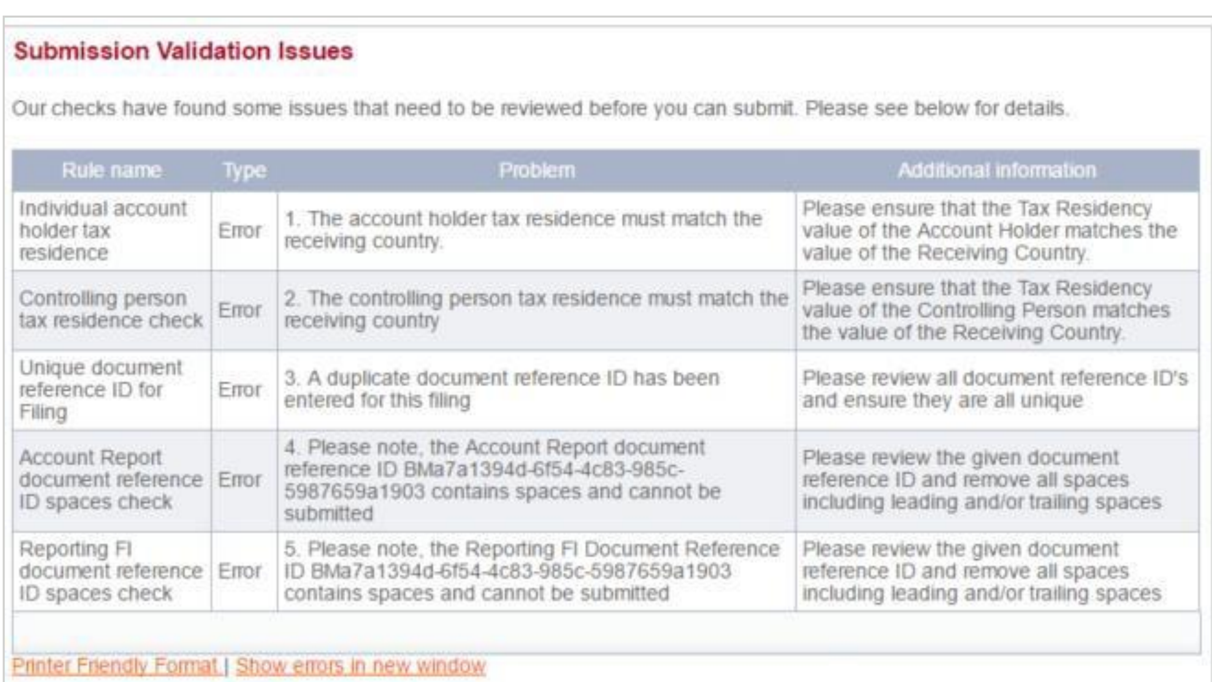
1. Navigate to the **Draft Filings** page using the menu at the top left of the screen. If there are errors on a filing that you have attempted to submit, the **error icon** (red circle with an exclamation point) will be displayed beside the filing's status, as shown in the image below.


Please select the name of the filing you wish to complete.

To create new filings, please use the "Create Filing" functionality.

Filing name	Reference	Revision	Categories	Receiving Country	Status	Filing end date	Due date
Change of Reporting Obligations 2019	RO01477	0.1		n/a	Ready to Submit	31/12/2019	30/01/2020

2. Click on the **error icon** to display the validation errors. A sample of potential errors is shown in the image below.


Submission Validation Issues

Our checks have found some issues that need to be reviewed before you can submit. Please see below for details.

Rule name	Type	Problem	Additional information
Individual account holder tax residence	Error	1. The account holder tax residence must match the receiving country.	Please ensure that the Tax Residency value of the Account Holder matches the value of the Receiving Country.
Controlling person tax residence check	Error	2. The controlling person tax residence must match the receiving country	Please ensure that the Tax Residency value of the Controlling Person matches the value of the Receiving Country.
Unique document reference ID for Filing	Error	3. A duplicate document reference ID has been entered for this filing	Please review all document reference ID's and ensure they are all unique
Account Report document reference ID spaces check	Error	4. Please note, the Account Report document reference ID BMa7a1394d-6f54-4c83-985c-5987659a1903 contains spaces and cannot be submitted	Please review the given document reference ID and remove all spaces including leading and/or trailing spaces
Reporting FI document reference ID spaces check	Error	5. Please note, the Reporting FI Document Reference ID BMa7a1394d-6f54-4c83-985c-5987659a1903 contains spaces and cannot be submitted	Please review the given document reference ID and remove all spaces including leading and/or trailing spaces

Printer Friendly Format | Show errors in new window

3. To correct errors and resubmit your filing, return to the **Draft Filings** page and then select the filing in question from the **Filing name** column of the table.

   - For the **Manual Entry Filing**: Select the **Edit** link next to the form(s) that you need to correct, update the data, and select **Validate & Save**. Then follow the steps to submit the filing, as per *Section 4.3 - Submitting a CRS filing via Manual Entry*.

   - For the **XML Upload Filing**: Select the **Upload data** link and select a new XML file to upload. The system will begin validation of your new file immediately.

     - **Important Note:** if data has already been populated into the form (i.e. it has passed XML validation but failed a business validation), you will be presented with a pop-up message that says "Do you want to delete all existing data before uploading a new file? ", and should select "Yes" to avoid further data validation issues. If the file failed at the XML validation stage, this step will not be required as data would not yet be populated into the forms.

6 Reviewing and Correcting Errors from Partner Jurisdictions

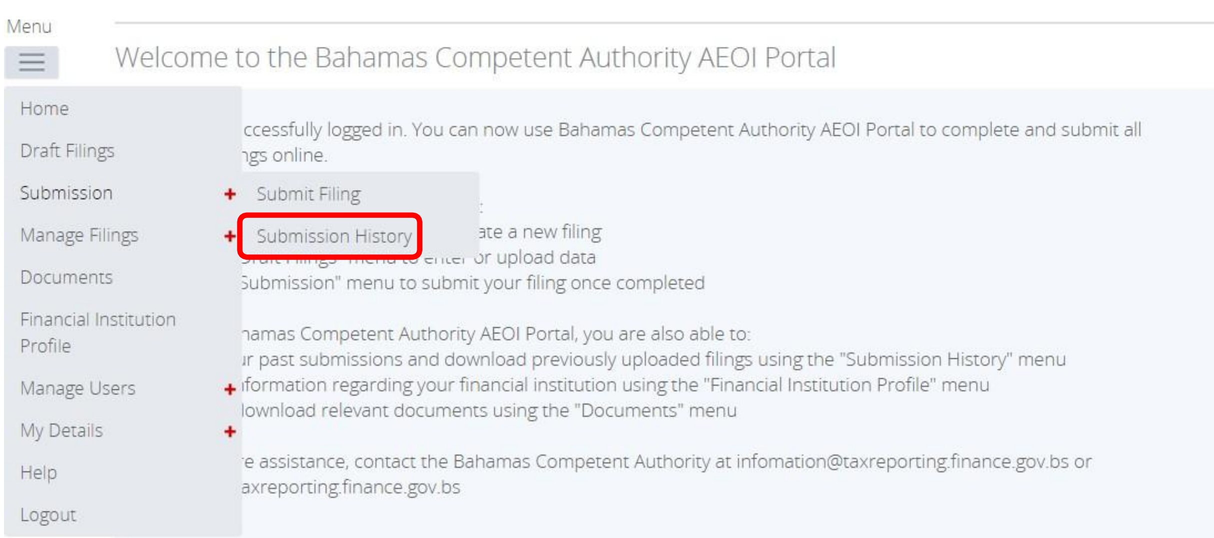
After the Bahamas Competent Authority transmits CRS filings submitted via **The Bahamas Competent Authority AEOI Portal** to the various Reportable Jurisdiction Competent Authorities, the receiving jurisdiction will review and respond to indicate whether the CRS filing is accepted as-is or if they have found errors with the submitted data.

6.1 Viewing CRS transmission progress and record errors

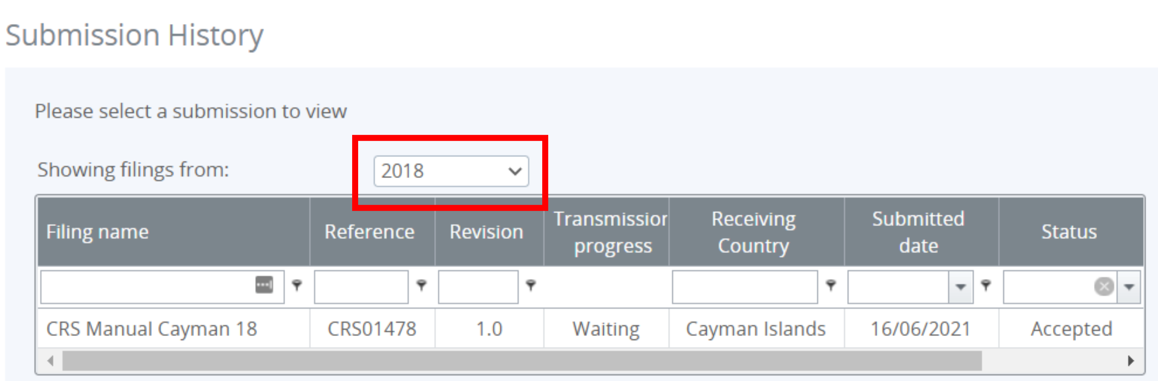
When a record validation error is received for a CRS filing, the users for the Reporting Entity that submitted the original filing will receive an email titled "Bahamas Tax Information Reporting Portal: Error Received for <FILING_REFERENCE>". The email will indicate the reference for the effected filing, and instruct the user to log-in to review and correct the error(s).

To view the transmission progress and record validation error(s) (where applicable) for any submitted CRS filing, follow the steps below:

1. Log in to **The Bahamas Competent Authority AEOI Portal** and select the appropriate Financial Institution if you have permissions for more than one entity.
2. Navigate to **Submission** > **Submission History** using the menus at the top of the screen.



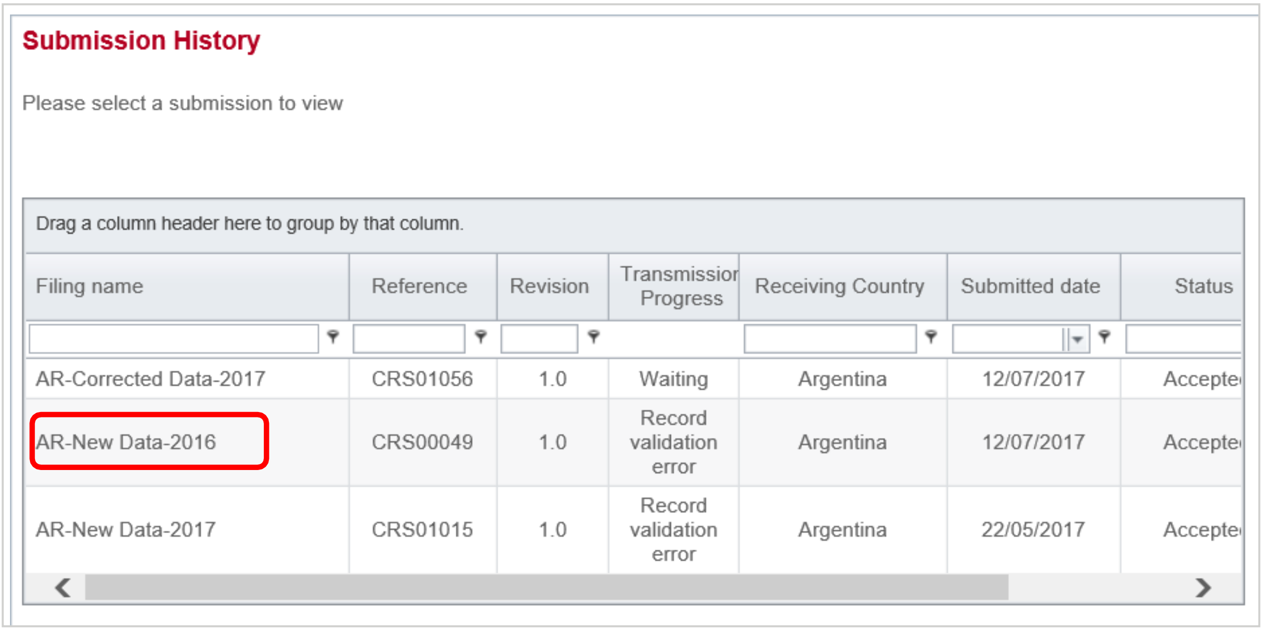
3. You will be presented with the **Submission History** page, which displays the filings that have been submitted for your Financial Institution. Select the **year** from the filings from drop down menu.



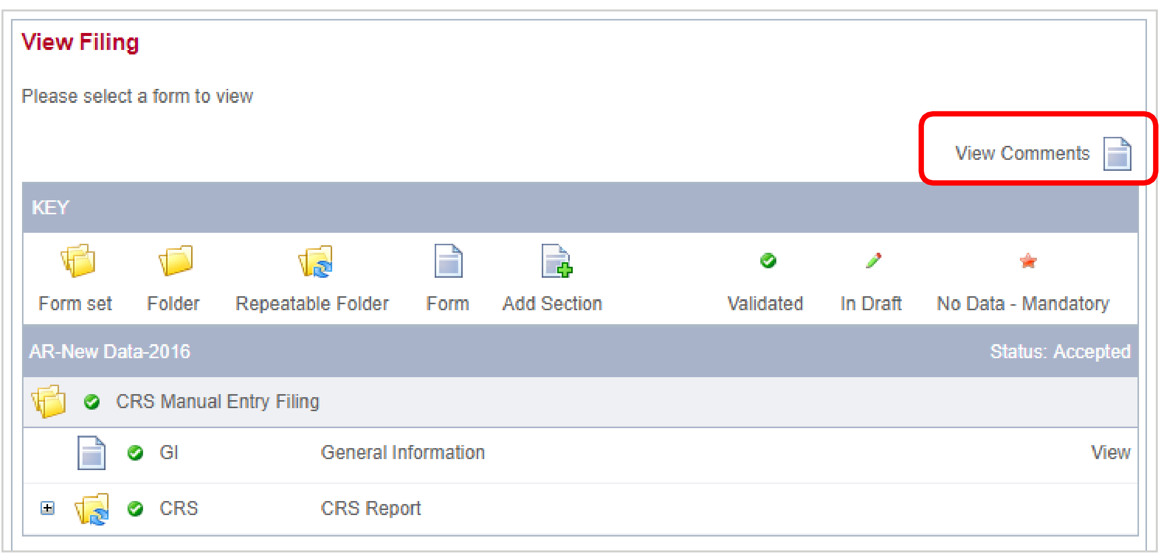
4. Review the Transmission Progress column to determine the status of your filing. When a CRS filing is created and submitted in **The Bahamas Competent Authority AEOI Portal**, it will have a Transmission Progress of "Waiting" until a response is received from the partner jurisdiction. Once a response is received, the Transmission Progress for the filing will be updated to either "Received" or "Record Validation Error".
   - Received: A message has been received from the partner jurisdiction, indicating that no errors have been found. No further action is required at this time.
   - Record Validation Error: A message has been received from the partner jurisdiction,

indicating that one or more error has been found that requires correction.

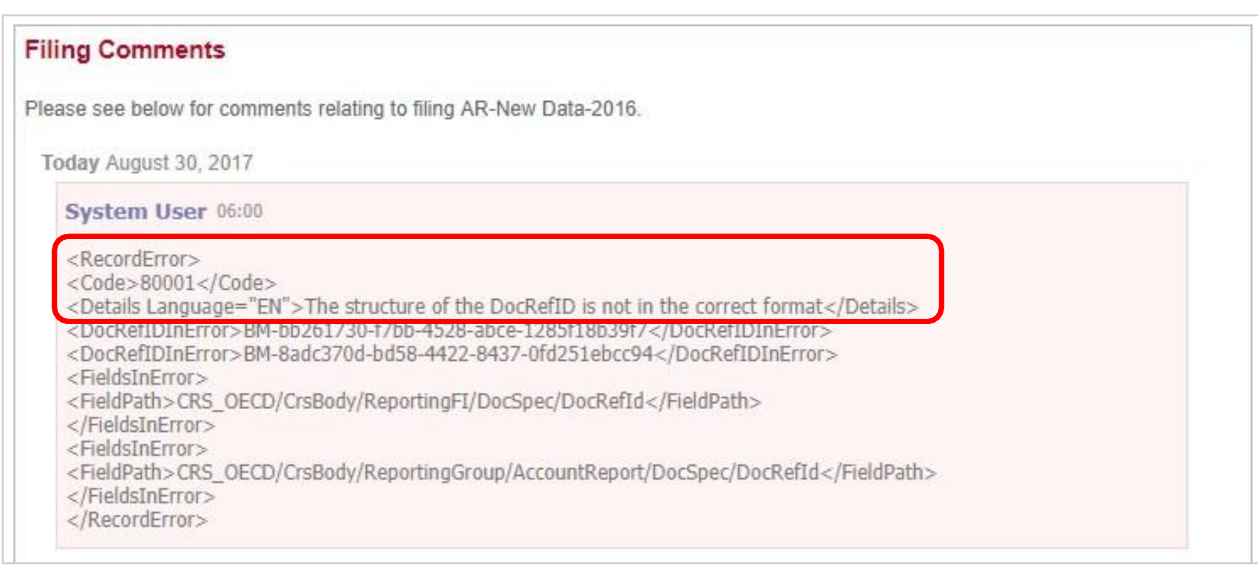
5. Select the name of the filing you wish to view from the **Filing name** column of the Submission History tab (the record validation error email will include the filing reference of any filings with record validation errors).



6. You will be presented with the View Filing page for the selected filing.
7. Select the **View Comments** icon to display the record error(s) for the filing.



8. Review the error(s) listed, specifically noting the <u>**<Code>**</u> and <u>**<Details>**</u> displayed.



The explanation for these CRS record error codes, as outlined by the OECD, are included in the table below. Note that the validation within the portal has been implemented such that a Financial Institution should never receive the majority of these errors back from a partner jurisdiction, as the error will be caught at the point of submission.

Record Validations – CRS data fields		
Record Error Code	**Validation name**	**Validation description**
60000	Account Number IBAN	The Account Number must follow the IBAN structured number format when the Account Number type= OECD601 – IBAN.
60001	Account Number ISIN	The Account Number must follow the ISIN structured number format when the Account Number type= OECD603 – ISIN.
60002	Account Balance	The account balance entered was less than zero. This amount must be greater than or equal to zero.
60003	Account Balance and Closed account	The Account Balance must be zero if account was indicated as closed in the account closed attribute.
60004	Person.Name type invalid	Name type selected is invalid, i.e. corresponds to the value not used for CRS: OECD201= SMFAliasOrOther
60005	Controlling Person type must be omitted	When the Account Holder is an Organisation and the "Account Holder Type" is CRS102 or CRS103, the "Controlling Person Type" must be omitted. (CRS102= CRS Reportable Person; CRS103= Passive Non-Financial Entity that is a CRS Reportable Person)
60006	Controlling Person type must be provided	When the Account Holder is an Organisation and the "Account Holder Type" is CRS101, the "Controlling Person Type" must be provided. (CRS101= Passive Non-Financial Entity with - one or more controlling person that is a Reportable Person)
60007	Reporting Group	The Reporting Group cannot be repeated.
60008	Sponsor	Sponsor cannot be provided.
60009	Intermediary	Intermediary cannot be provided
60010	Pool Report	Pool Report cannot be provided.
60011	Verify data sorting Person ResCountry Code	When the Person is a Controlling Person or an Individual Account Holder, at least one of the according ResCountryCodes must match the Message Receiving Country Code
60012	Verify data sorting Organisation ResCountry Code	At least one of either the Entity Account Holder ResCountryCode or Controlling Person ResCountryCode must match the Message Receiving Country Code.
60013	Verify data sorting ReportingFI. ResCountry Code	ReportingFI.ResCountryCode should always be provided and it must match the Message Sending Country Code
60014	BirthDate	Date of birth should be in a valid range (e.g. not before 1900 and not after the current year).
60015	AccountReport	AccountReport can only be omitted if ReportingFI is being corrected/deleted or, in the case of domestic reporting, if there is nil reporting. If the ReportingFI indicates new data or resent, then AccountReport must be provided.

Record Validations – Missing or empty fields		
Record Error Code	**Validation name**	**Validation description**
70000	MessageRefID	Mandatory element
70001	Individual Account Holder TIN	Cannot be left blank if element is included
70002	Individual Account Holder First Name	Mandatory element (Note: use "NFN" for No First Name)
70003	Individual Account Holder Last Name	Mandatory element
70004	Individual Account Holder Address - City	Mandatory element
70005	Controlling Person TIN	Cannot be left blank if element is included
70006	Controlling Person First Name	Mandatory element (Note: use "NFN" for No First Name)
70007	Controlling Person Last Name	Mandatory element
70008	Controlling Person Address - City	Mandatory element

70009	Organisation Account Holder IN	Cannot be left blank if element is included
70010	Organisation Account Holder Name	Mandatory element
70011	Organisation Account Holder Address - City	Mandatory element
70012	Reporting FI IN	Cannot be left blank if element is included
70013	Reporting FI Name	Mandatory element
70014	Reporting FI Address - City	Mandatory element
70015	Account Number	Mandatory element
Record Validations – Fields used for the correction process		
Record Error Code	**Validation name**	**Validation description**
80000	DocRefID already used	The DocRefID is already used for another record.
80001	DocRefID format	The structure of the DocRefID is not in the correct format, as set out in the User Guide.
80002	CorrDocRefId unknown	The CorrDocRefId refers to an unknown record.
80003	CorrDocRefId no longer valid	The corrected record is no longer valid (invalidated or outdated by a previous correction message). As a consequence, no further information should have been received on this version of the record.
80004	CorrDocRefId for new data	The initial element specifies a CorrDocRefId. Only corrected or deleted records should have a CorrDocRefID.
80005	Missing CorrDocRefId	The corrected element does not specify any CorrDocRefId.
80006	DocSpec. CorrMessage RefID	The CorrMessageRefID is forbidden within the DocSpec_Type.
80007	MessageSpec. CorrMessage RefID	The CorrMessageRefID is forbidden within the Message Header
80008	Resend option	The Resend option may only be used with respect to the Reporting FI element.
80009	Delete ReportingFI	The Reporting FI cannot be deleted without deleting all related Account Reports.
80010	Message TypeIndic	A message can contain either new records (OECD1) or corrections/deletions (OECD2 and OECD3), but should not contain a mixture of both.
80011	CorrDocRefID twice in same message	The same DocRefID cannot be corrected or deleted twice in the same message.
80012	Reporting Period	A message must not contain data for two different Reporting Periods.

6.2 Submitting CRS Corrections

To address a record validation error, the Financial Institution must create and submit a "Corrected" CRS filing that references the original filing to correct the errors indicated, and submit it via **The Bahamas Competent Authority AEOI Portal**.

Corrected filings are created and submitted via XML Upload or Manual Entry, using the same processes outlined in section *4 - Submitting CRS filings*.

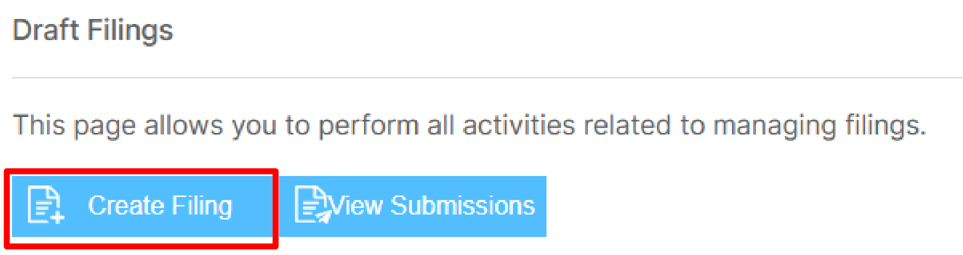
When submitting a Corrected filing, you must ensure the following:

- The Message Type Indicator must be set to "The message contains corrections for previously sent information" (CRS702).
- The Document Type Indicator for the Reporting FI section must be set to either "Resent Data" (OECD0), "Corrected Data" (OECD2) or "Deletion of Data" (OECD3). Resent Data (OECD0) should only be used when one or more Account Reports are being corrected or deleted, but there are no updates being sent for the Reporting FI section.
- The Document Type Indicator for the Account Report section must be set to either "Corrected Data" (OECD2) or "Deletion of Data" (OECD3). "Resent Data" (OECD0) is not permitted for the Account Report section.

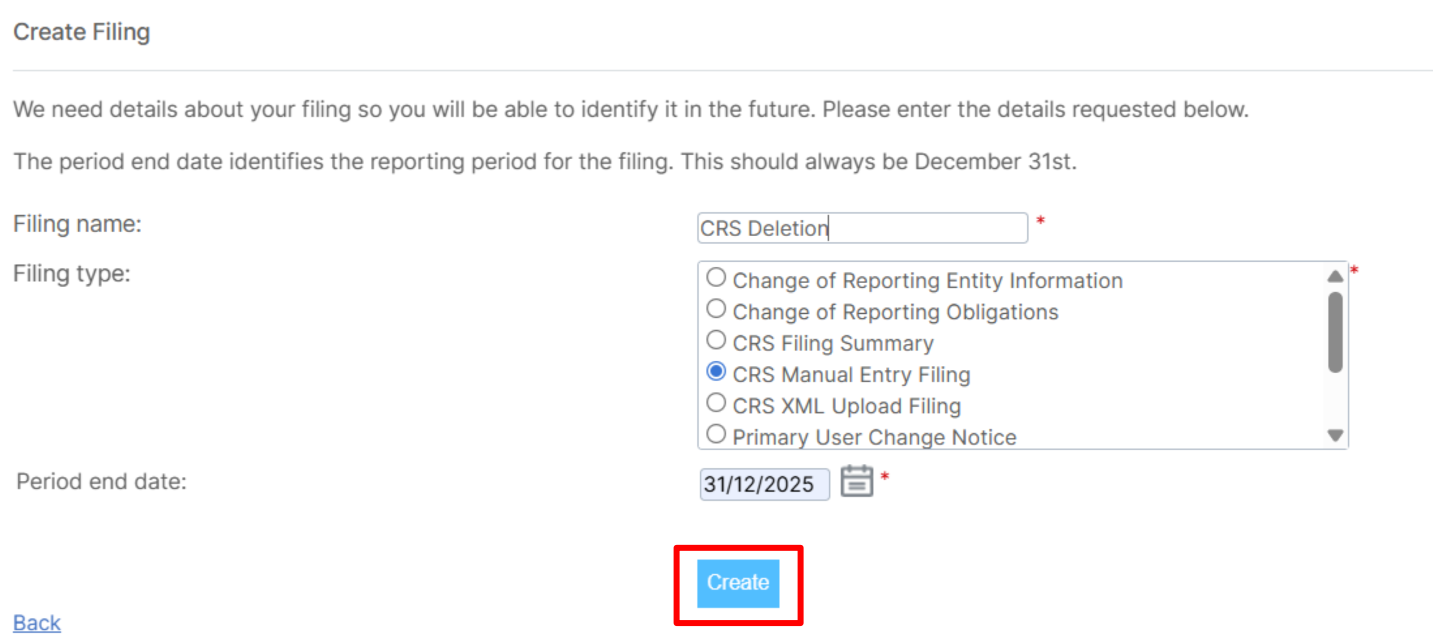
- If the Reporting FI section is being resent without modification (using OECD0 - Resent Data), the same Document Reference ID should be used as was used in the previous submission. For any sections containing a modification, a new unique Document Reference ID should be used.
- The Corresponding Document Reference ID for each section being corrected or deleted should reference the Document Reference ID from the associated section of the previous filing. This should always refer to the *latest* document reference ID. For example, for a correction of a previous correction record, the CorrDocRefID of the second correction of the message must reference the DocRefID of the first correction (not the initial record).
- A correction message can contain either corrections (OECD2) or deletions (OECD3) or both, as well as a resent Reporting FI element (OECD0), but may not contain new data (OECD1).

6.3 Deletion of Data

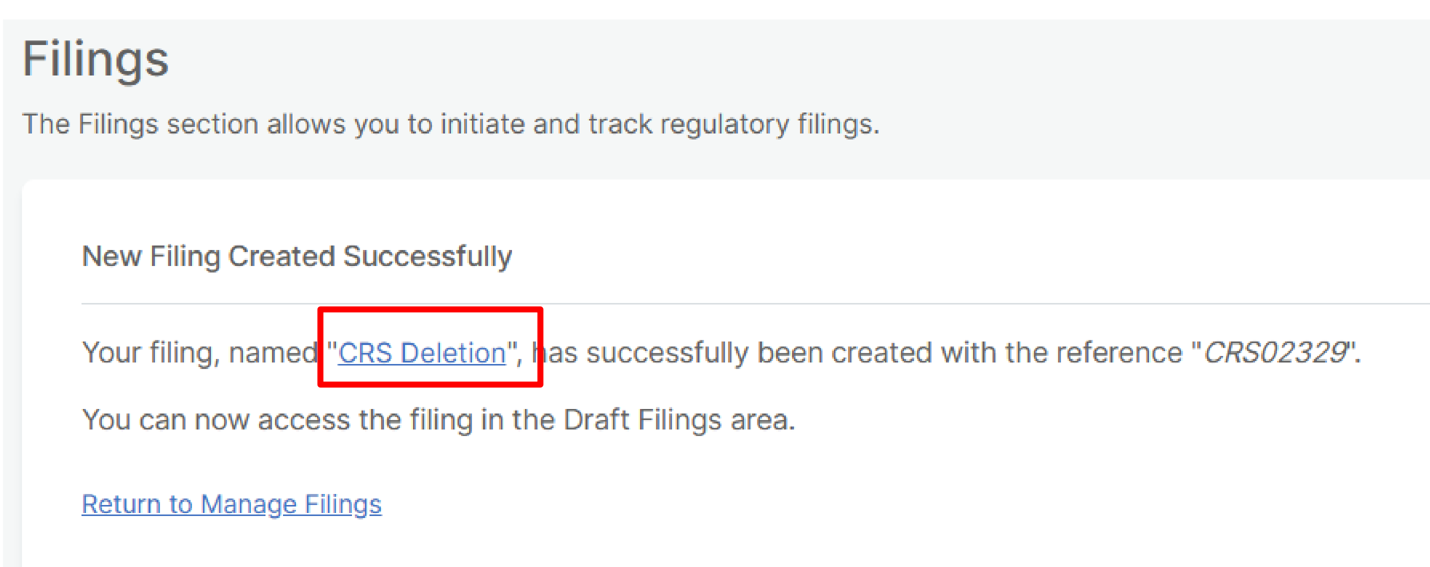
Create a filing.



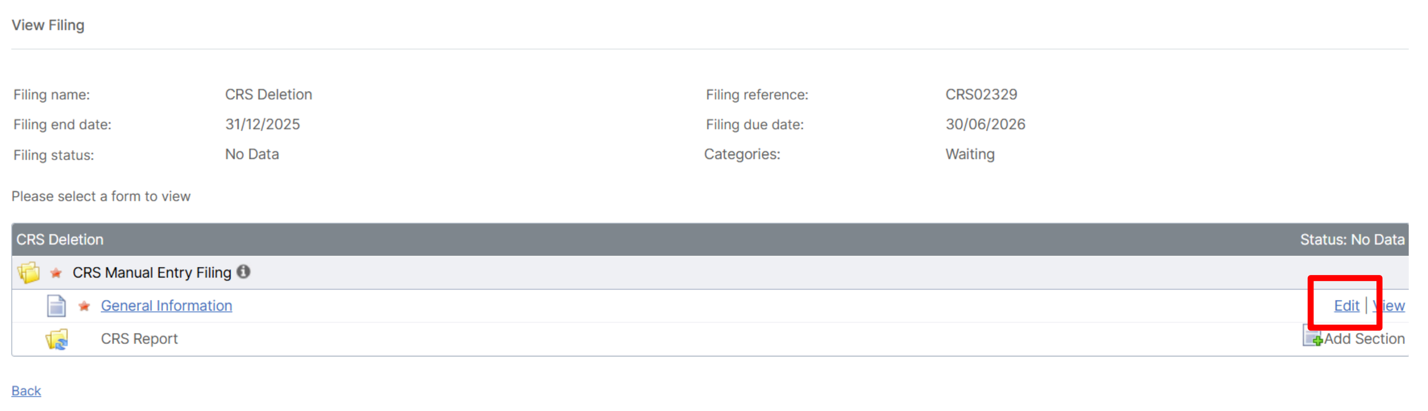
Enter Filing Name, select Filing Type and enter Period End Date. Click Create.



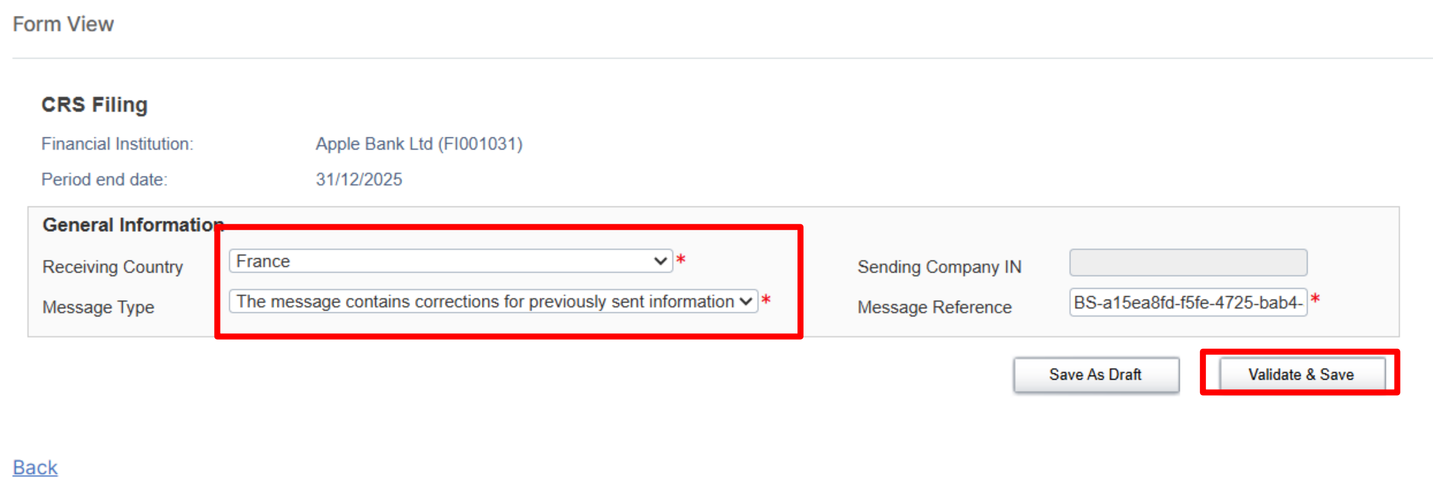
Click on Filing Name.



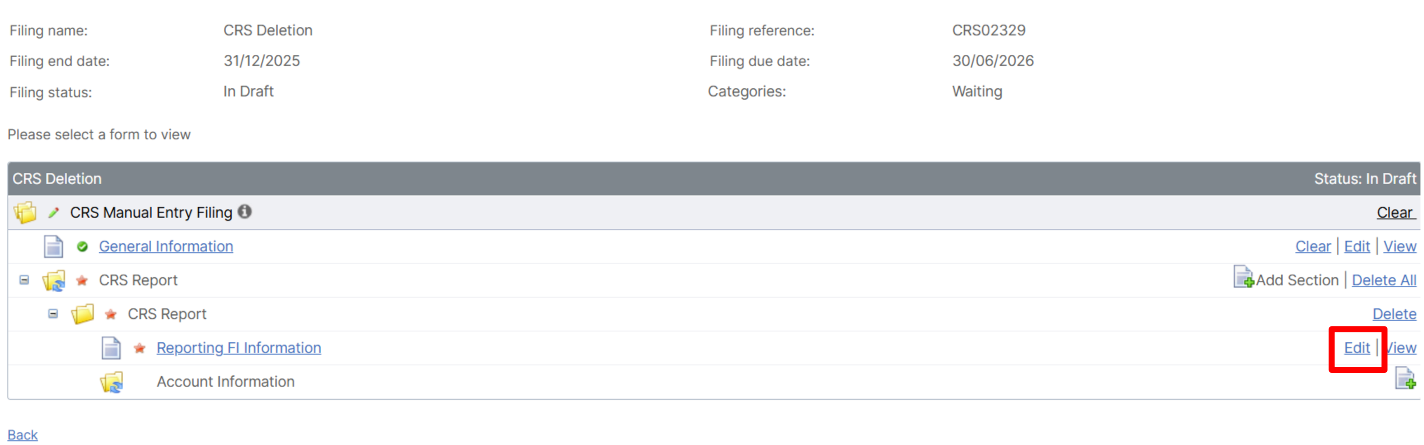
Click **Edit** for General Information.



Select **Receiving Country**, Change **Message Type** to **The message contains corrections for previously sent information**. Click Validate & Save.

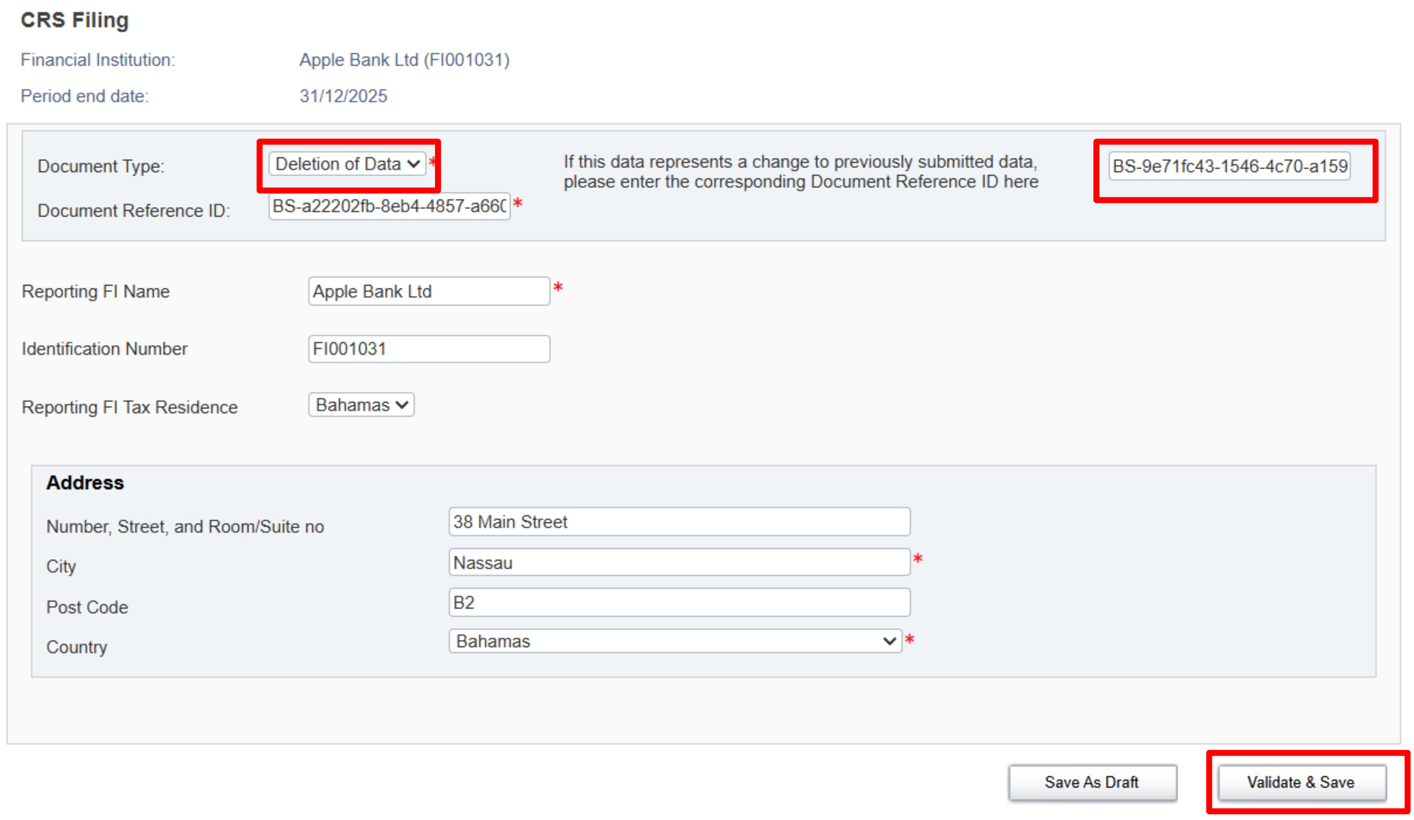


Click **Add Section**. Expand **CRS Report**. Click **Edit** for Reporting FI Information

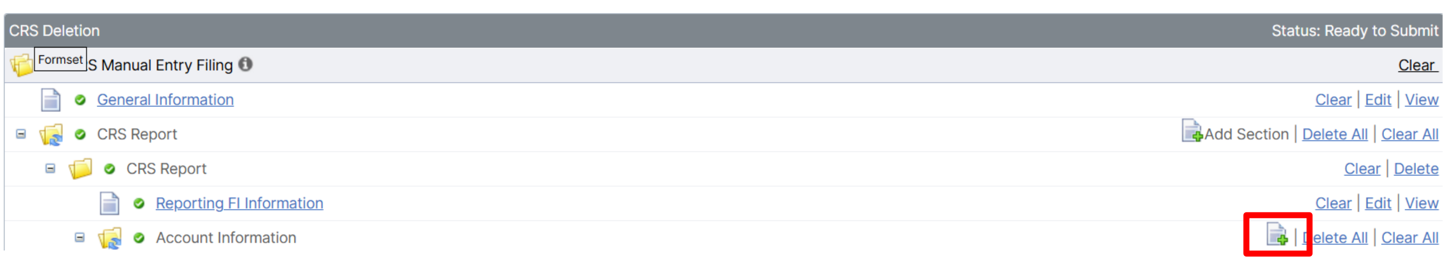


Select **Deletion of Data** for **Document Type**. Copy the Doc Ref ID from the original submission to the box on the right hand side of the screen with **please enter the corresponding Document Reference ID here**.

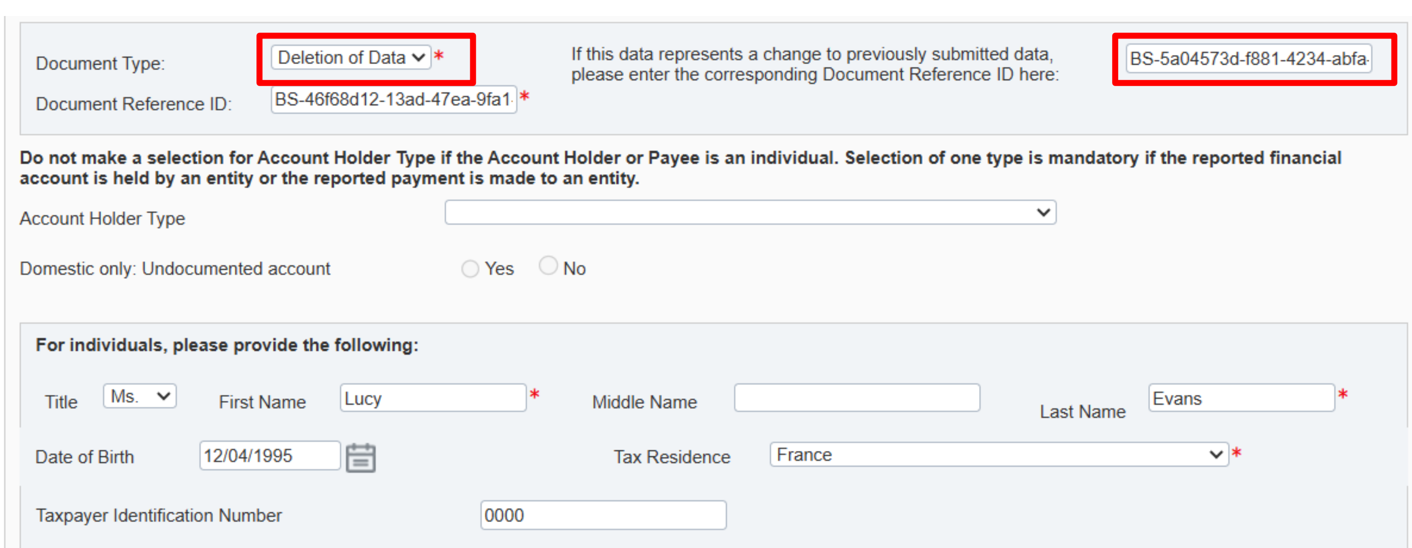
Click **Validate & Save**.



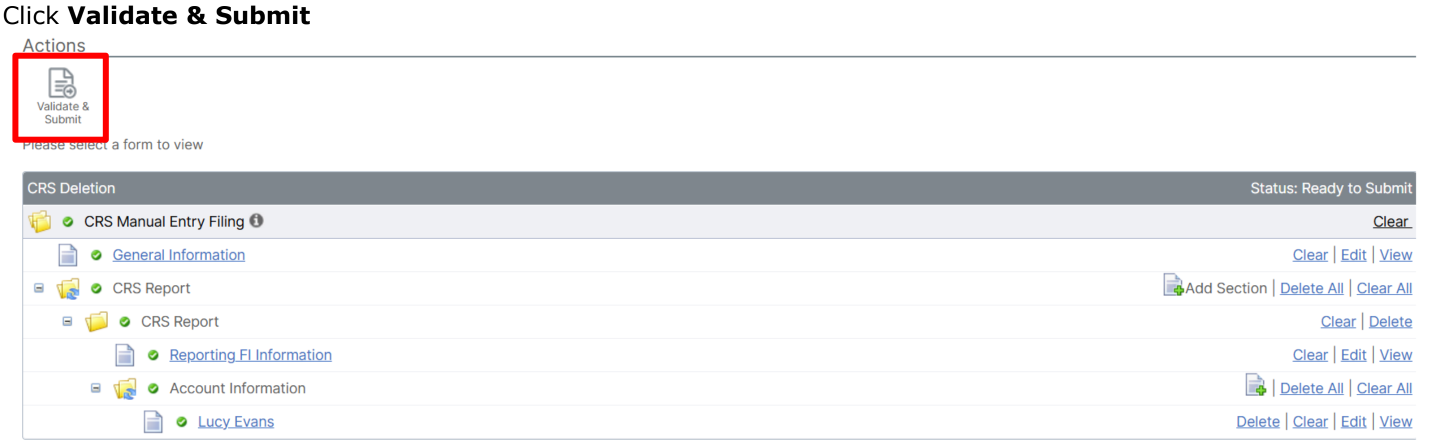
Add **Account Information**



Copy the Doc Ref ID from the original account submission to the box on the right hand side of the screen with **please enter the corresponding Document Reference ID here**. Enter the relevant details. Click Validate & Save.

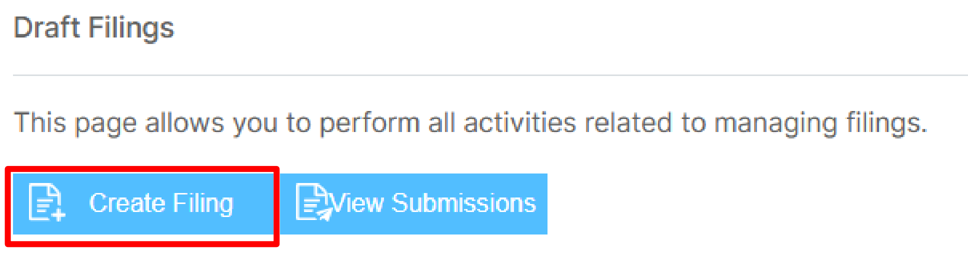


Click **Validate & Submit**

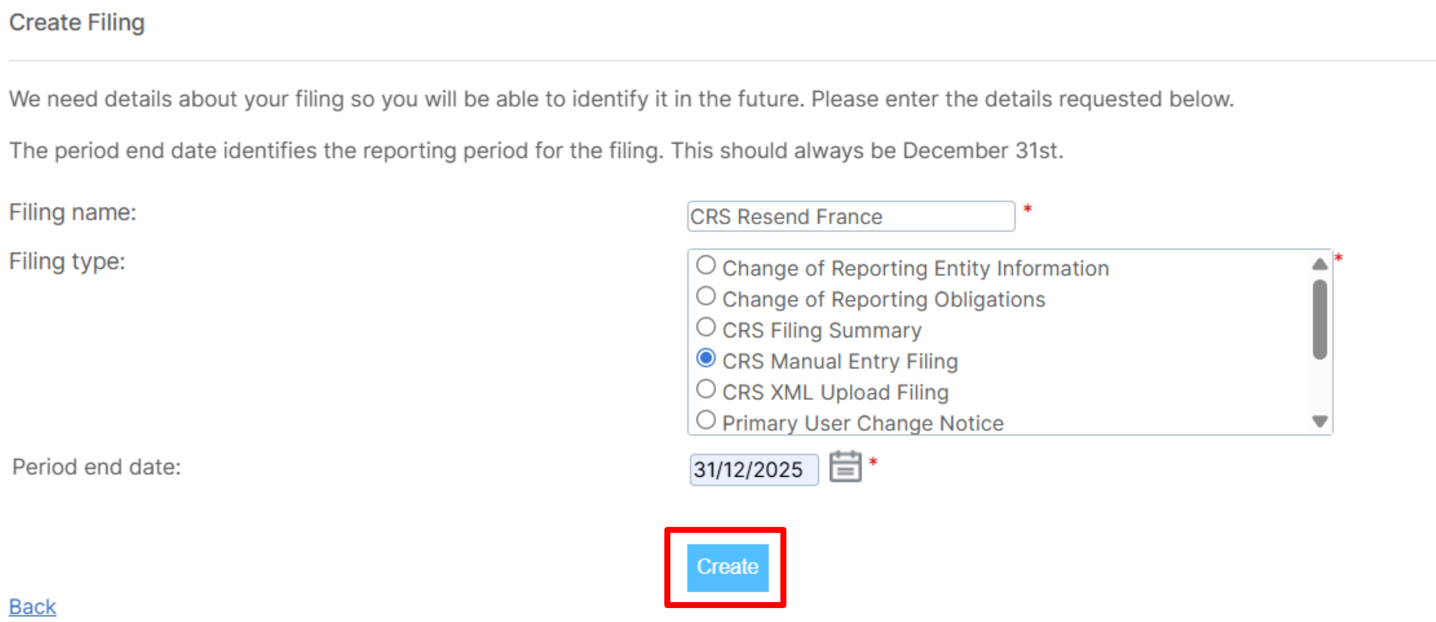


6.4 Resend Data

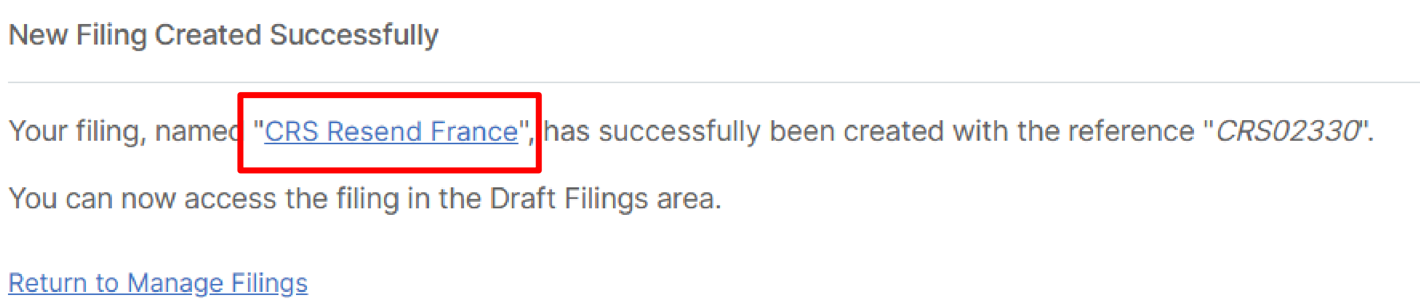
Create a filing.



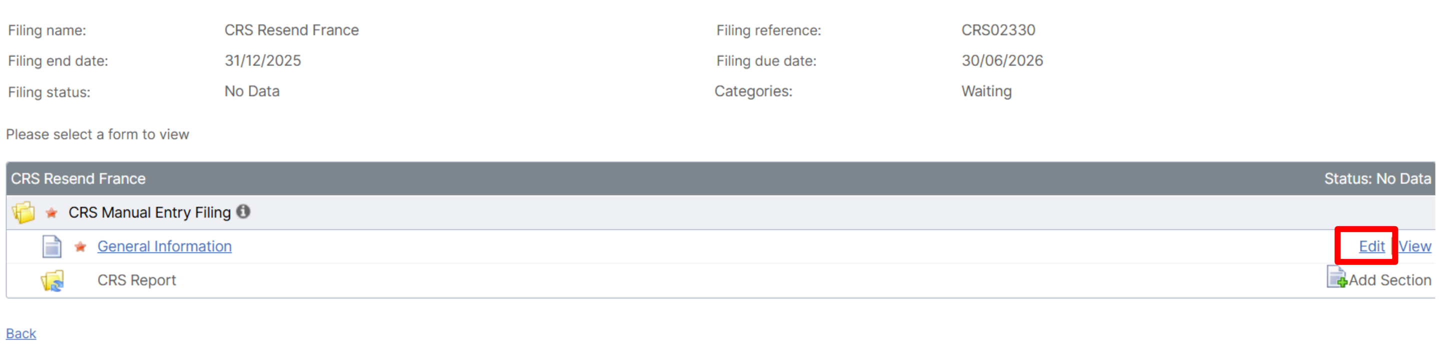
Enter Filing Name, select Filing Type and enter Period End Date. Click Create.



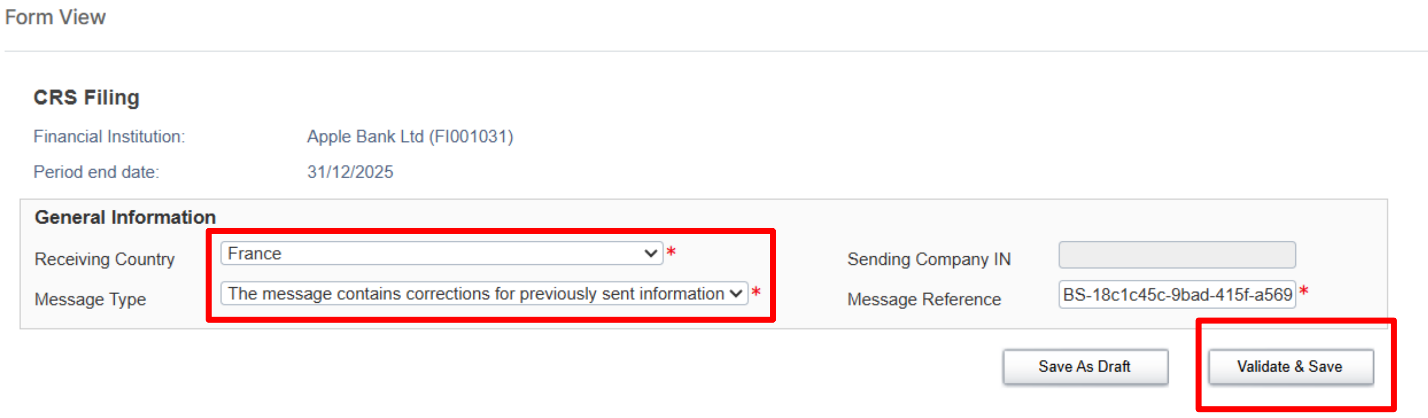
Click **Filing Name**



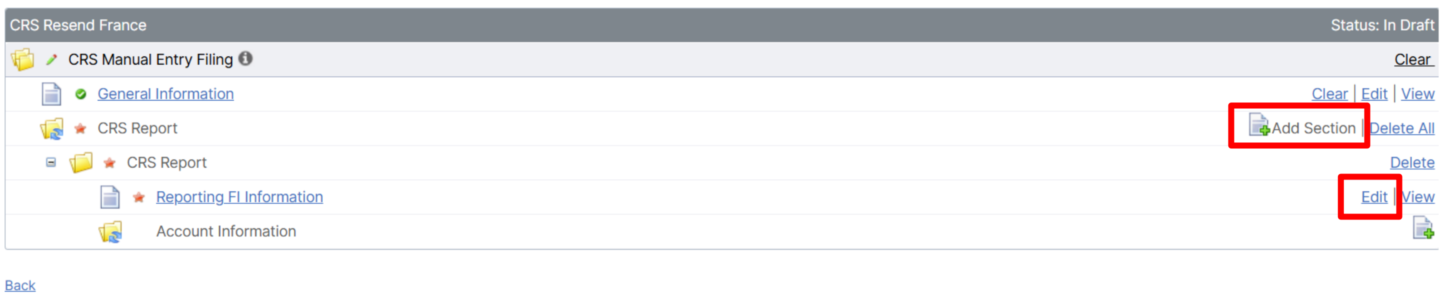
Click **Edit** for General Information.



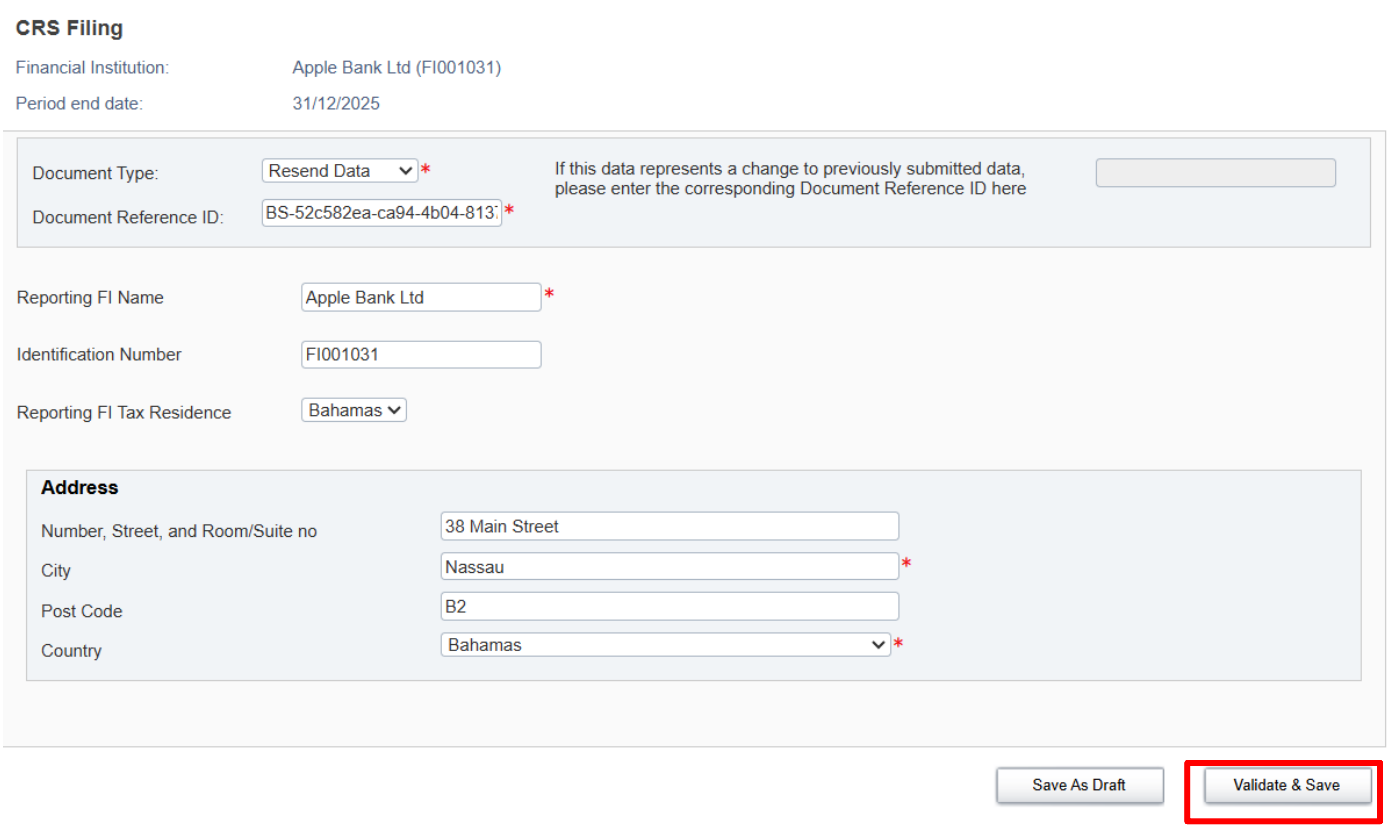
Select **Receiving Country**. Change Message Type to **The message contains corrections for previously sent information**.



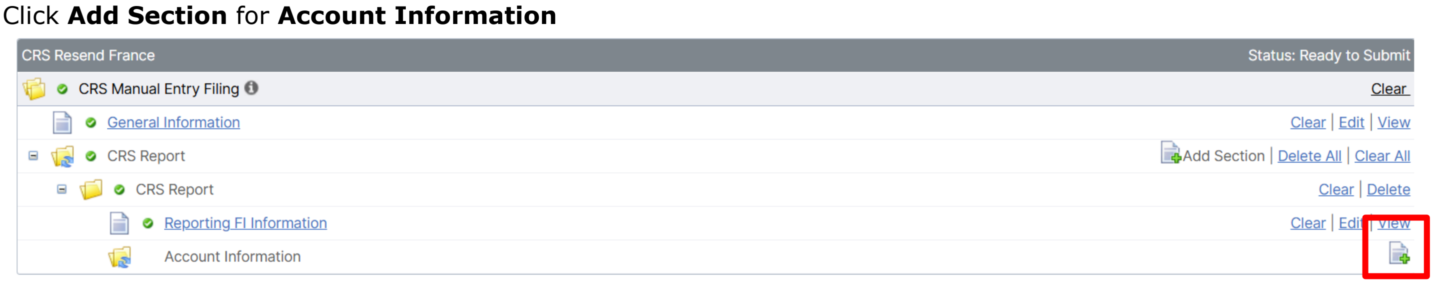
Click **Add Section**. Expand **CRS Report**. Click **Edit** for **Reporting FI Information**.



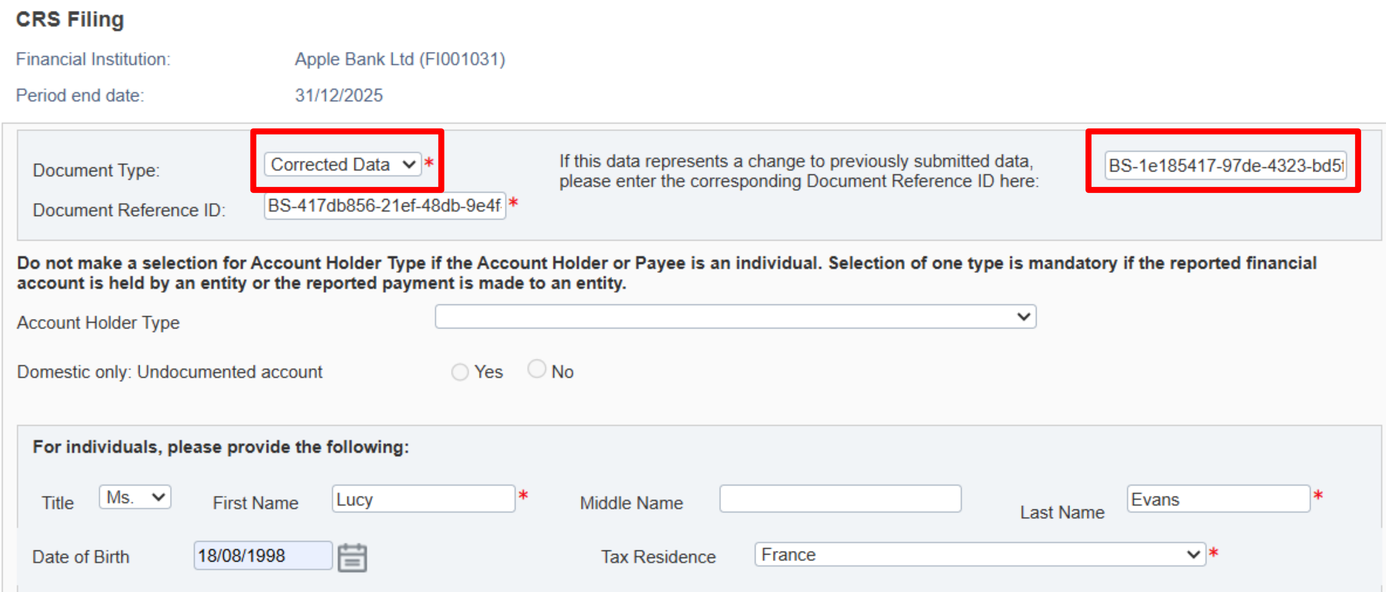
Select **Resend Data** for **Document Type.** Click **Validate & Save.**



Click **Add Section** for **Account Information**

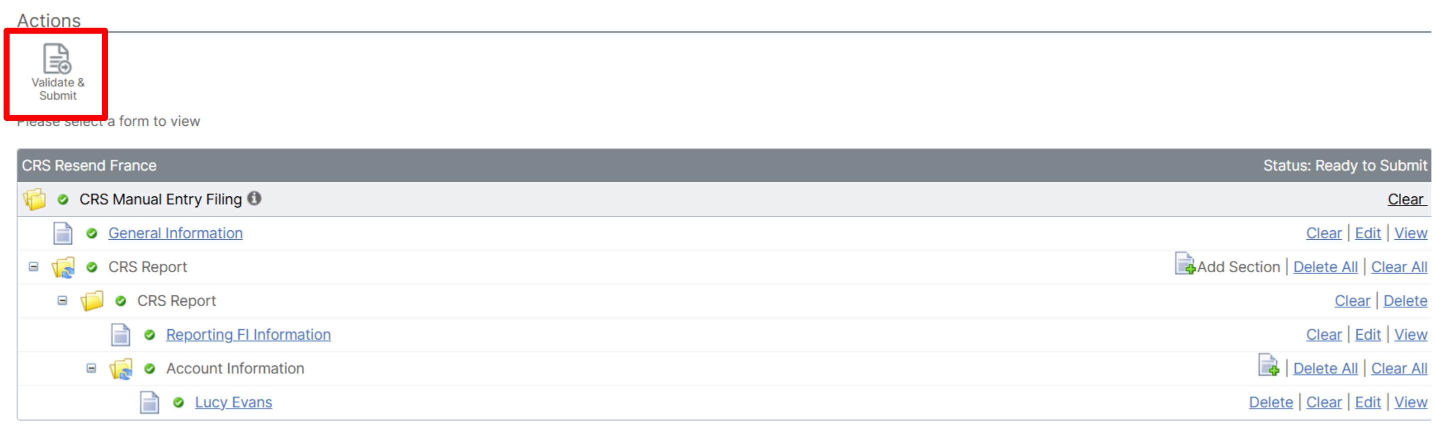


Ensure Document Type is **Corrected Data**. Copy and Paste Doc Ref Id from original submission for account to box on right hand side of the screen.



Enter relevant details. Click **Validate & Save**.

Click **Validate & Submit**.



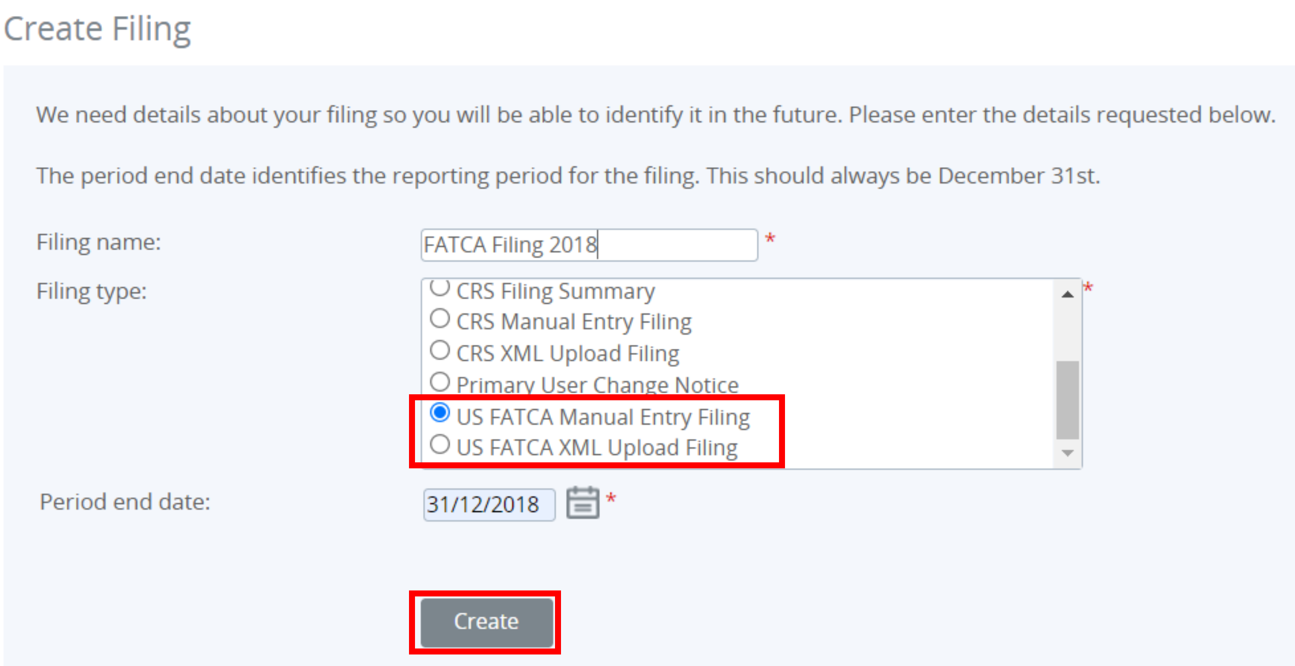
7 Submitting FATCA filings

7.1 Creating FATCA filings

In order to submit data to the Bahamas Competent Authority to meet your FATCA reporting requirements, you must first create a filing.

1. Navigate to the **Create Filing** screen using the menu at the top left of the screen. Select **Manage Filings** > **Create Filing**, as shown in the image below.

2. You will be presented with the **Create Filing** page, as shown in the image below.



3. Enter a **Filing name** that is meaningful to you. It is best practice to include the year at a minimum (e.g. FATCA Report - 2016) so that filings can be easily differentiated over time.

4. Select the **Filing type** that you want to complete.

    - **Important note:** If you will be providing data in an XML file, you must choose the *US FATCA XML Upload* filing type. If you will be entering data manually in a web form, you must choose the *US FATCA Manual Entry* filing type.

5. Enter the **Period end date** for the filing.

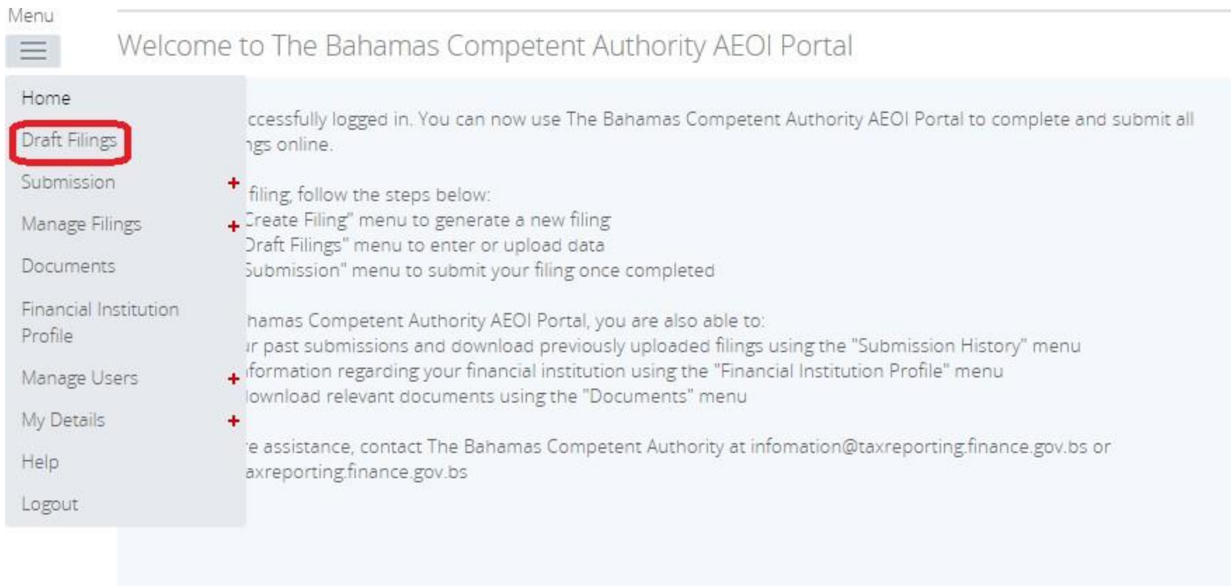
    - **Important note:** The period end date is the last day of the reporting period (the calendar year). For FATCA, this date must **always be December 31st**. Failure to select December 31st will result in an error being displayed on screen.

6. Select the **Create** button to complete the creation of your filing and make it available to enter or upload data.

7.2 Submitting a FATCA XML Upload filing

By selecting the Return type as US FATCA XML Upload (see *Section IV.1.1 Creating US FATCA Returns*), a User may submit data by uploading an XML file into the Return.

1. Using the menu bar, navigate to Draft Filings to view the Returns that have been created.



2. Select the name of the Filing from the Filing name column of the Draft Returns table to open that Return.

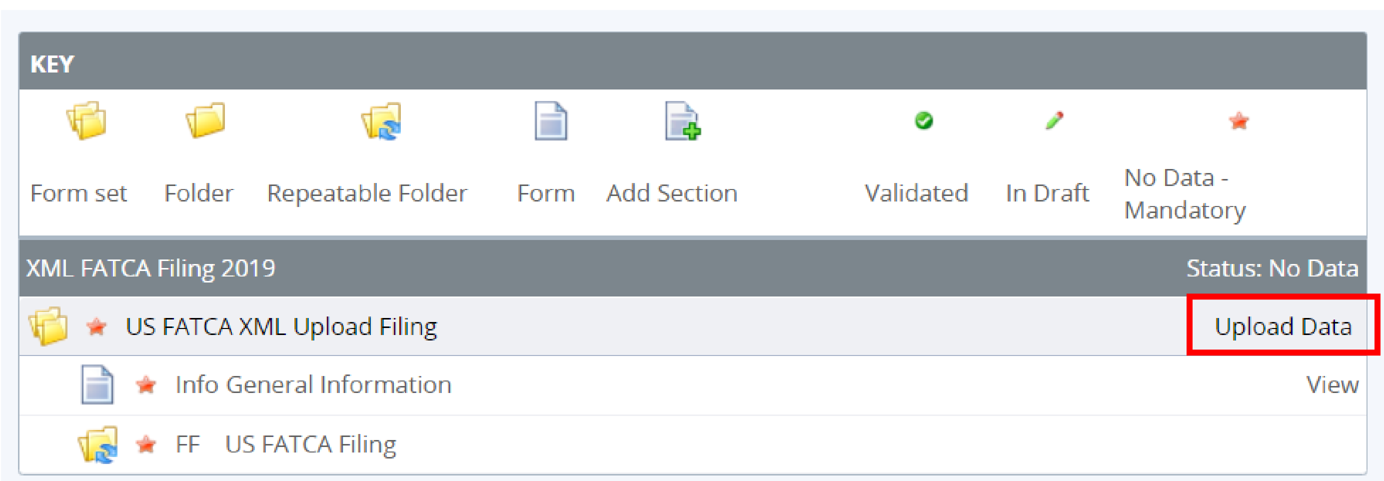
Draft Filings

Please select the name of the filing you wish to complete.

To create new filings, please use the "Create Filing" functionality.

Filing name	Reference	Revision	Categories	Receiving Country	Status	Filing end date	Due date
XML FATCA Filing 2019	FF01487	0.1	Waiting	n/a	No Data	31/12/2019	30/05/2020

3. Select **Upload data** within the Return table.



4. Select **Browse** and choose the XML file to be uploaded. The AEOI Portal will only accept files in the IRS FATCA XML v2.0 format.

The AEOI Portal will begin the validation of the XML file against the IRS XML Schema v2.0 immediately.

- If the file is in the acceptable XML format it will be processed.
- If the file is not in the acceptable XML format the upload will not be successful and an error message will be displayed. The User must upload a file in the correct format.
- The User will receive a system-generated email when the processing is complete, indicating whether the submission was successful, or unsuccessful.
    - If unsuccessful due to validation errors, the file must be amended and resubmitted.
    - The IRS has published a list of prohibited characters within XML returns:

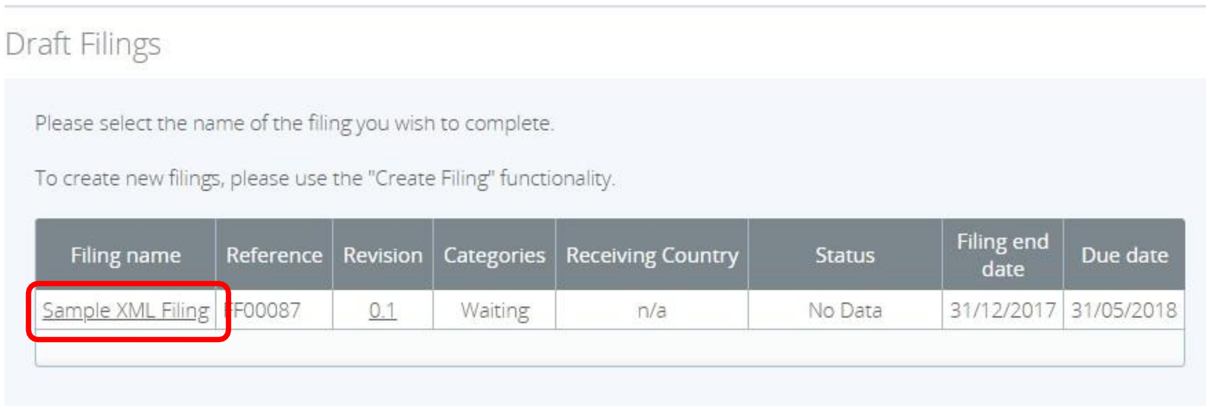
https://www.irs.gov/Businesses/Corporations/FATCA-XML-Schema-Best-Practices-for-Form-8966

7.3 Submitting a FATCA Manual filing

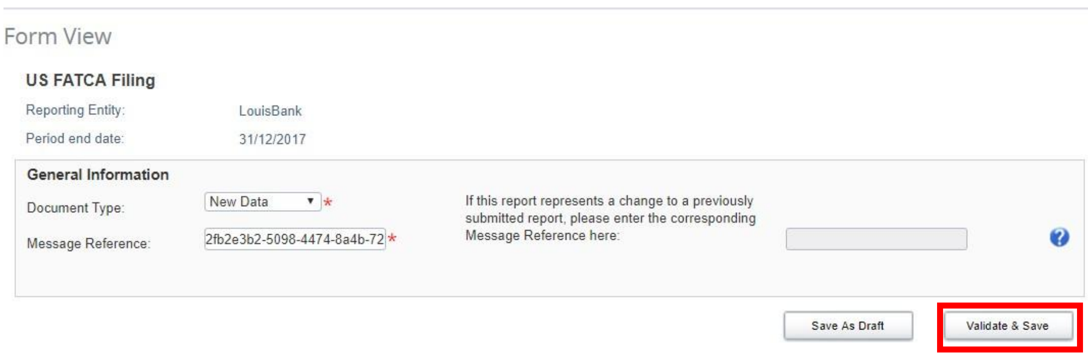
If you have chosen the US FATCA Manual Entry filing (see section 6.1 *Creating FATCA filings*), you will submit your FATCA data by typing data into a web form.

Navigate to the **Draft Filings** screen using the menu at the top left of the screen to view filings that you have created but not yet submitted.

1. Select the name of the filing you created from the **Filing name** column of the Draft Filings table to open that filing. You will be presented with the **Draft Filing** screen for that filing.



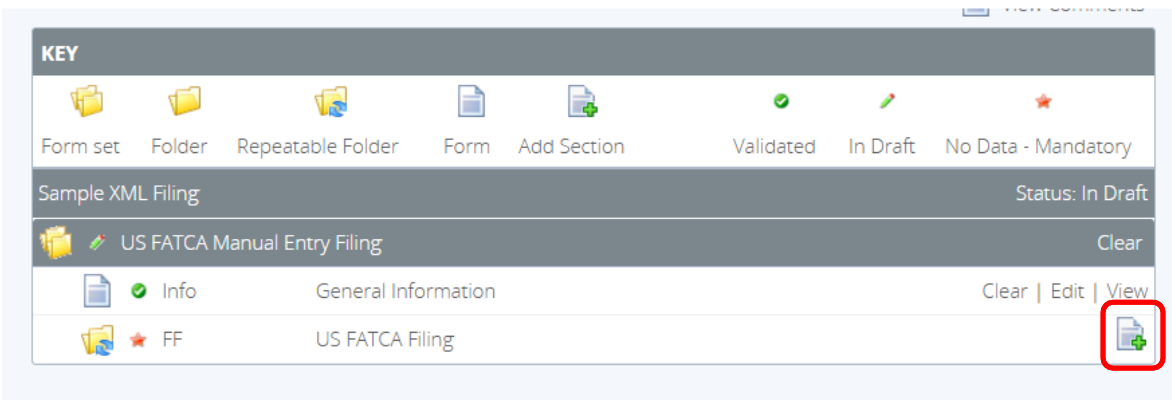
2. Select the Edit link beside the General Information form to confirm the data type related to the document being submitted. You will be presented with the editable form for data entry. The image below is a sample General Information form.



- **Important note:** The Message Reference field includes a unique system-generated code. This code will be auto-populated with a Global Unique Identifier (GUID) in line with the IRS FATCA XML Schema v2.0 user guide. You should take note of this reference as you will need to enter this message reference if you have to correct, amend or void a filing.

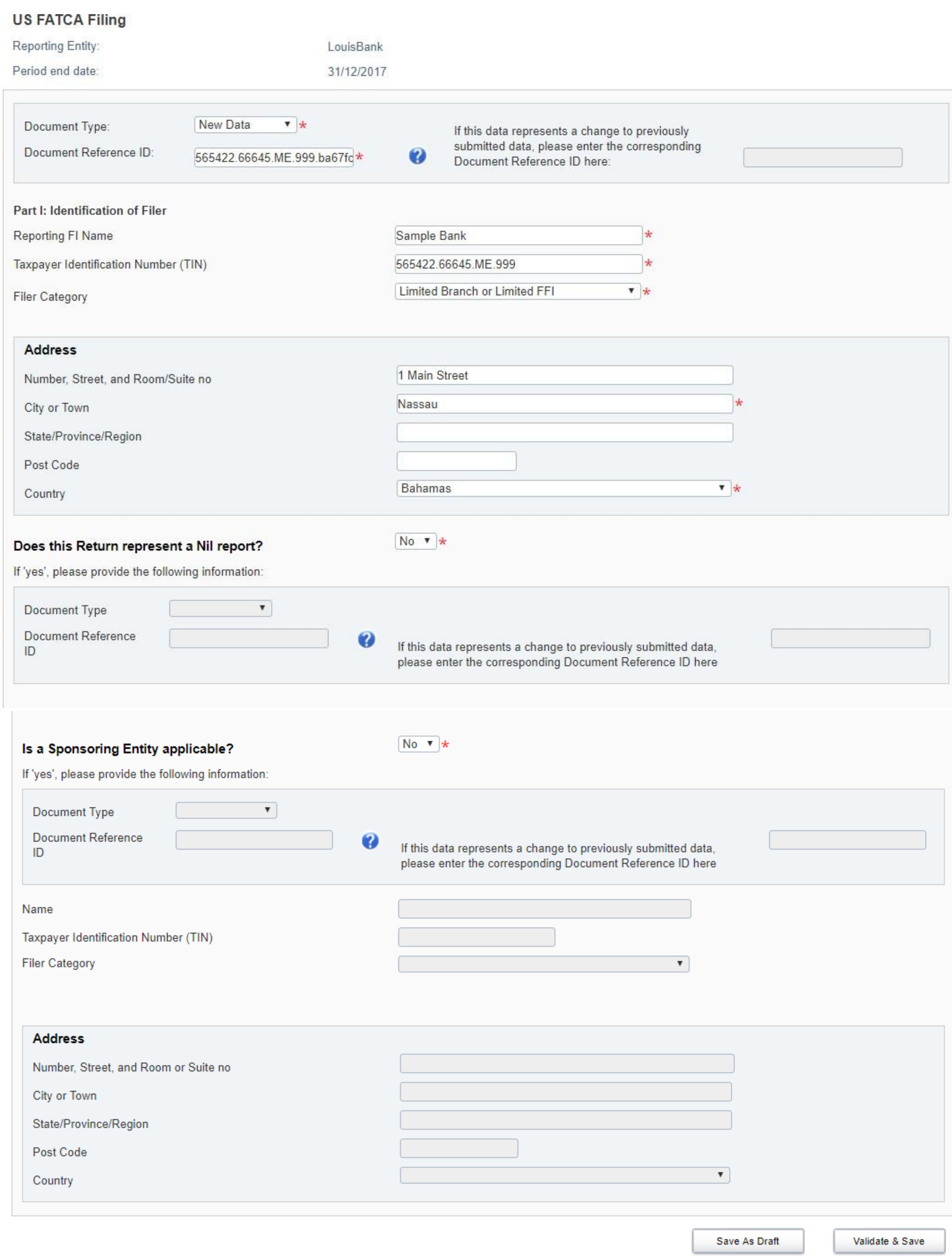
3. Enter your data in the fields presented (if required) and select **Save as Draft** to continue entering data later or **Validate & Save** to mark the form ready for submission.
   - **Important note:** All mandatory fields (marked with a red asterisk) must be completed for the form to successfully Validate & Save. Otherwise, errors will be presented on-screen.

4. To complete the remainder of the filing, select the **Add Section** icon next to the US FATCA Filing repeatable folder to generate a US FATCA Filing folder.
   - **Important note:** Sponsoring Entities will need to add a US FATCA Filing folder for each sponsored entity they are reporting for.
   - **Important note:** As of 1st January, 2017, all Sponsored Entities are required to have their own GIINs as they can no longer use the GIIN of its Sponsoring Entity. See IRS guidance at: https://www.irs.gov/businesses/corporations/frequently-asked-questions-faqsfatca-compliance-legal#SponsoringQ1



5. Expand the **US FATCA** Folder and select the Edit link beside the Reporting FI Information form to enter data.

6. You will be presented with the editable form for data entry. The two images below show a sample **Reporting FI Information** form.



Changes made to the Reporting FI form in accordance with the US FATCA XML Schema Version 2.0 User Guide:

- A Nil Report section has been inserted on the form in accordance with section 6.3 of the IRS FATCA XML Schema v2.0 user guide. FIs are now required to indicate if the report they are submitting is a Nil Report. All filings must include an Account Holder form UNLESS it has been indicated in the Reporting Financial Institution form that it is a NIL REPORT.

- A Filer Category drop down for both the Reporting FI and the Sponsor has been inserted on the form and it is mandatory that either the Reporting FI Filer Category or Sponsor Filer Category is provided. See section 4.6.1 of the IRS FATCA XML Schema v2.0 user guide for more information, which specifies that **the Reporting FI Filer Category must be FATCA602 (RDC FFI) for Reporting Model 1 FFIs** where a sponsor is not applicable. If a Sponsor is applicable, the Reporting FI Filer Category should be left blank and the Sponsor Filer Category should be completed with the appropriate category instead.

7. Complete all required information on the form and select "**Validate & Save**"

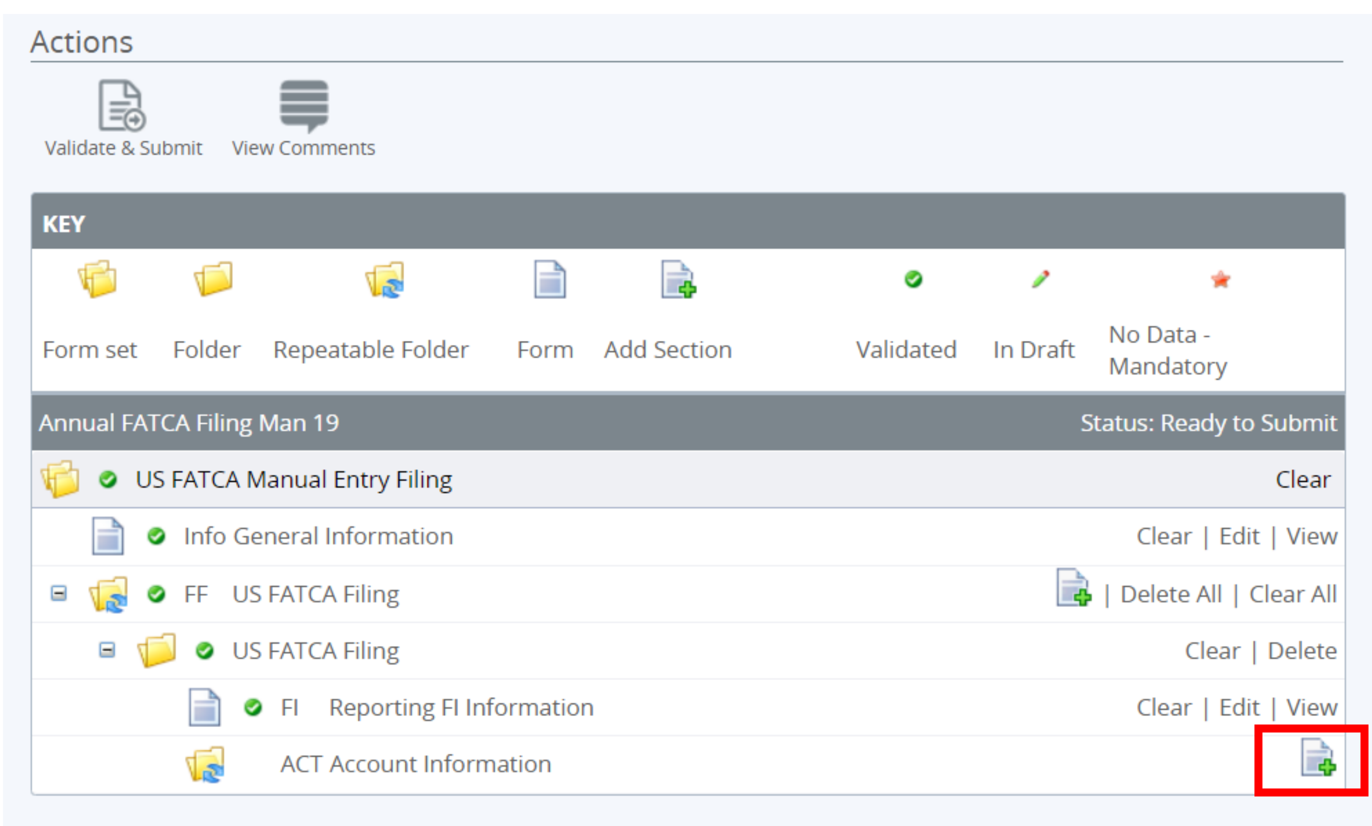
- **Important note:**

    i. The Document Type is a field that is included in several sections of the filing (Reporting FI, Nil Report, Sponsoring Entity, Intermediary, and Account Information). Allowable entries are FATCA1 = New Data, FATCA2 = Corrected Data, FATCA3 = Void data, and FATCA 4 = Amended Data. More information on each of these types can be found in the IRS FATCA XML User Guide. The IRS specifies that only one type of data should be contained in any single transmission file, so you must ensure that you select the same Document Type throughout the filing.

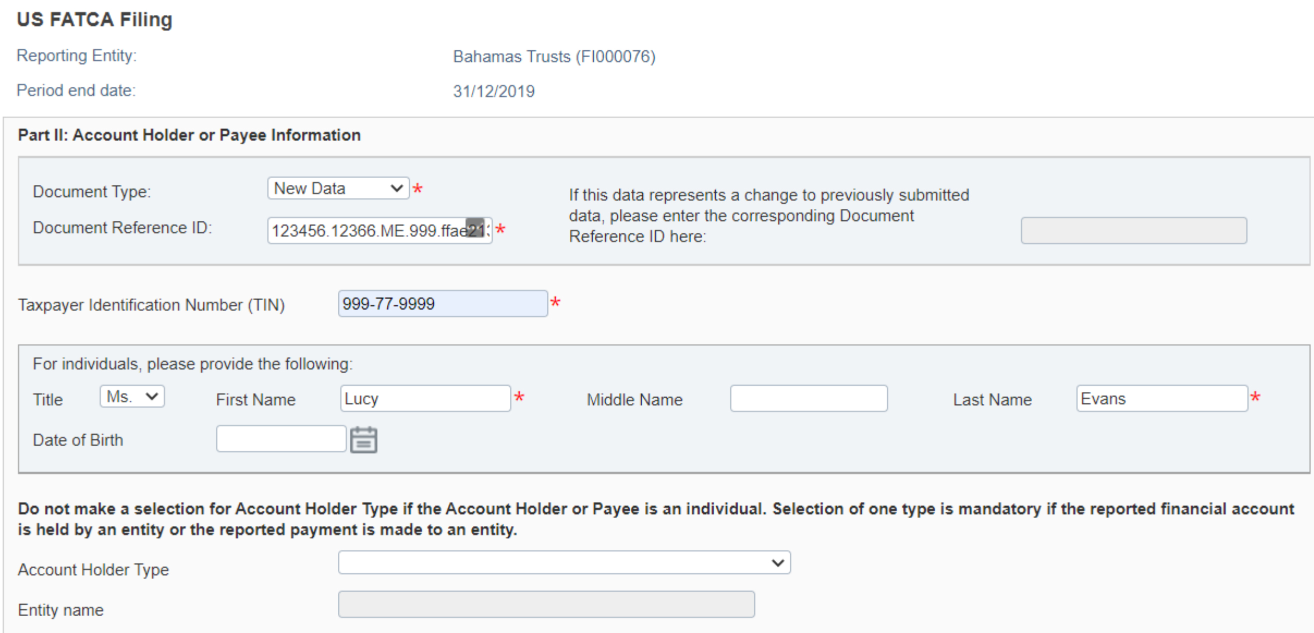
    ii. The **Document Reference ID** is a field that is included in several sections of the filing (Reporting FI, Nil Report, Sponsoring Entity, Intermediary, and Account Information). The IRS has introduced new format requirements for Document Reference IDs, requiring all IDs to follow the format **<ReportingGIIN>.<UniqueValue>.** More information can be found here: http://www.irs.gov/Businesses/Corporations/FATCA-XML-Schemas-Best-Practices-for-Form-8966-DocRefID. It is also important to note that the DocRefID must be completed for each applicable section in this form and that the <unique value> part of the DocRefID should be different in each section, to avoid any DocRefID validation errors. You should keep a record of these IDs as you will need to reference the appropriate one if you have to correct, amend or void a section of your filing.

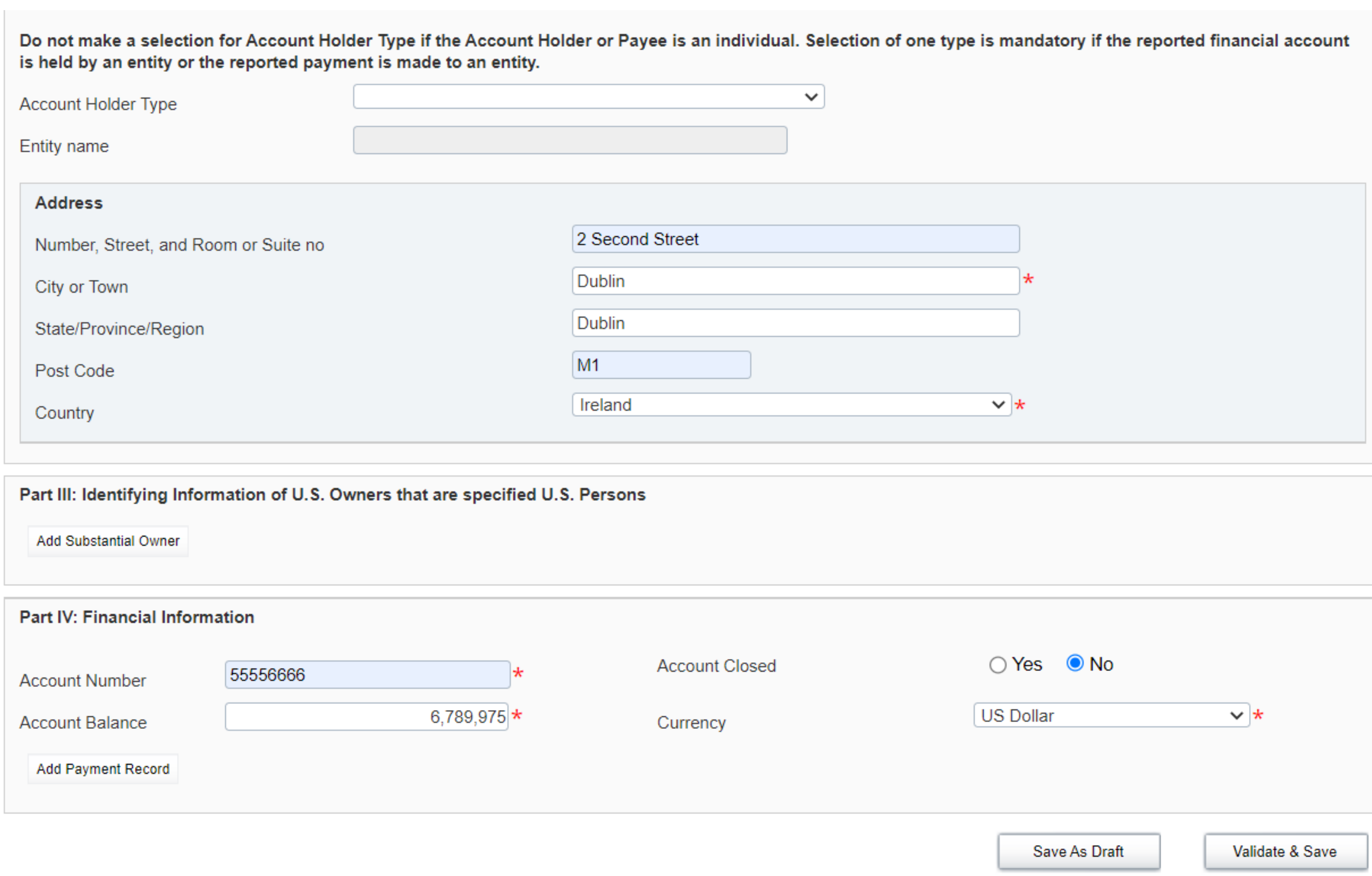
    iii. Three "Taxpayer Identification Number (TIN)" fields exist on this form. The first one (under the "Reporting FI Information" field) should be populated with the GIIN of the Reporting FI. The second and third "Taxpayer Identification Number (TIN)" fields under the Sponsoring Entity and Intermediary sections should be populated with the TIN or GIIN of the Sponsoring Entity or Intermediary Entity respectively, as applicable.

8. Select the **Add Section** icon next to the **Account Information** section to add an account or pooled report.



9. You will be presented with the editable form for data entry. The image below shows a sample **Account Information** form.





10. Complete the mandatory information for the account and select "**Validate & Save**".

- **Important notes:**

    i. The Document Type is a field that is included in several sections of the filing (Reporting FI, Nil Report, Sponsoring Entity, Intermediary, and Account Information). Allowable entries are FATCA1 = New Data, FATCA2 = Corrected Data, FATCA3 = Void data, and FATCA 4 = Amended Data. More information on each of these types can be found in the IRS FATCA XML version 2.0 User Guide. The IRS specifies that only one type of data should be contained in any single transmission file, so you must ensure that you select the same Document Type throughout the filing.

    ii. The Document Reference ID is a field that is included in several sections of the filing (Reporting FI, Nil Report, Sponsoring Entity, Intermediary and Account Information). The IRS has introduced new format requirements for Document Reference IDs, requiring all IDs to follow the format **<ReportingGIIN>.<UniqueValue>.** More information can be found here: http://www.irs.gov/Businesses/Corporations/FATCA-XML-Schemas-Best-Practices-for-Form-8966-DocRefID. It is also important to note that the DocRefID must be completed for each applicable section in your filing and that the <unique value> part of the DocRefID should be different in each section, to avoid any DocRefID validation errors. You should keep a record of these IDs as you will need to reference the appropriate one if you have to correct, amend or void a section of your filing.

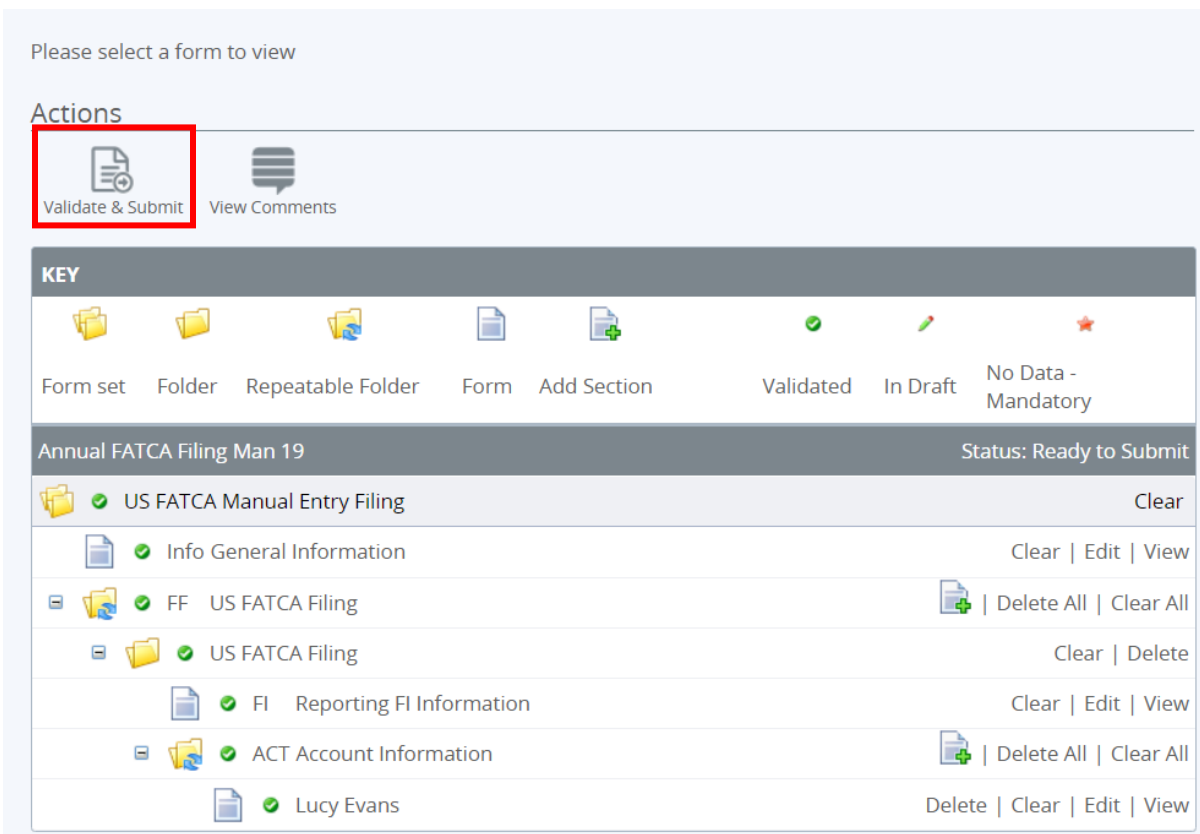
iii. Three "TIN" fields exist on this form. The first one, "Taxpayer Identification Number (TIN)", should be populated with the TIN of the individual or entity that holds the account. The second and third TIN fields are presented when you select the "Add Substantial Owner" button. "Organisation TIN" should be populated with the TIN of the Substantial Owner, if this section is applicable and the Substantial Owner Type is an Organisation. "Individual TIN" should be populated with the TIN of the Substantial Owner, if this section is applicable and the Substantial Owner Type is an Individual.

iv. The bottom of the Account Information form includes an "Add payment record" button, to record one or more payments on the reported account. If the financial institution has any payments to report on the account, they must complete all three fields. Records can be added or deleted as required.

11. Repeat Step 9 for each account report you are reporting.

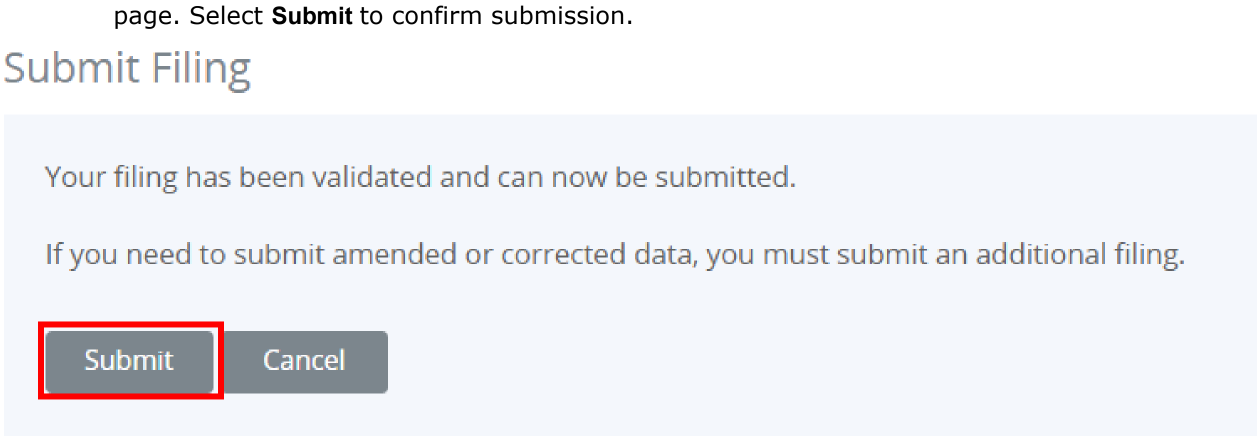
In order to submit your Manual Entry filing, all mandatory forms within the filing must be in **Validated** status, indicated by a green check mark icon (see the **KEY** on the **Draft Filing** page for an explanation of icons).

Click **Validate & Submit**.



If there are validation issues with your filing, you will be notified on the page.

1. If there are no validation issues with your filing, you will be presented with the **Submit Filing** page. Select **Submit** to confirm submission.

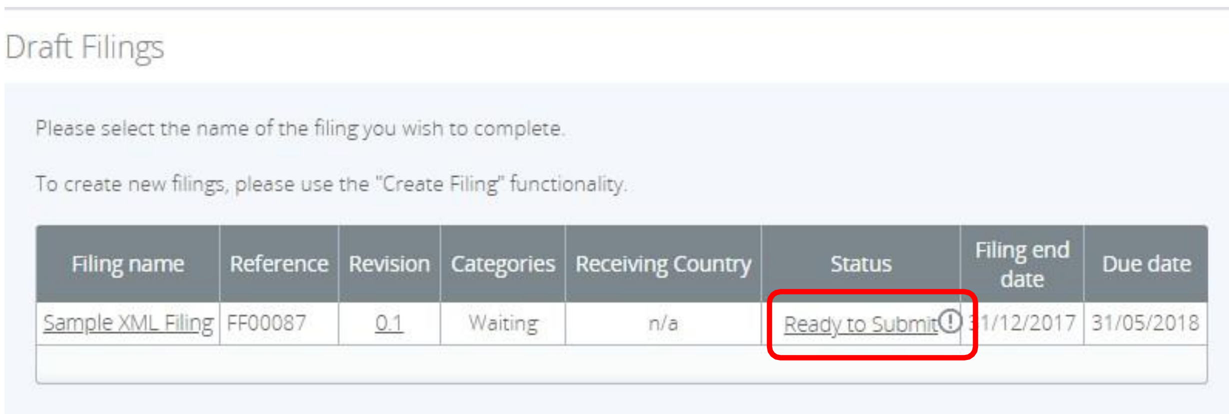


2. Once your filing is successfully submitted with no errors, you will receive a system-generated email notifying you of the successful submission.

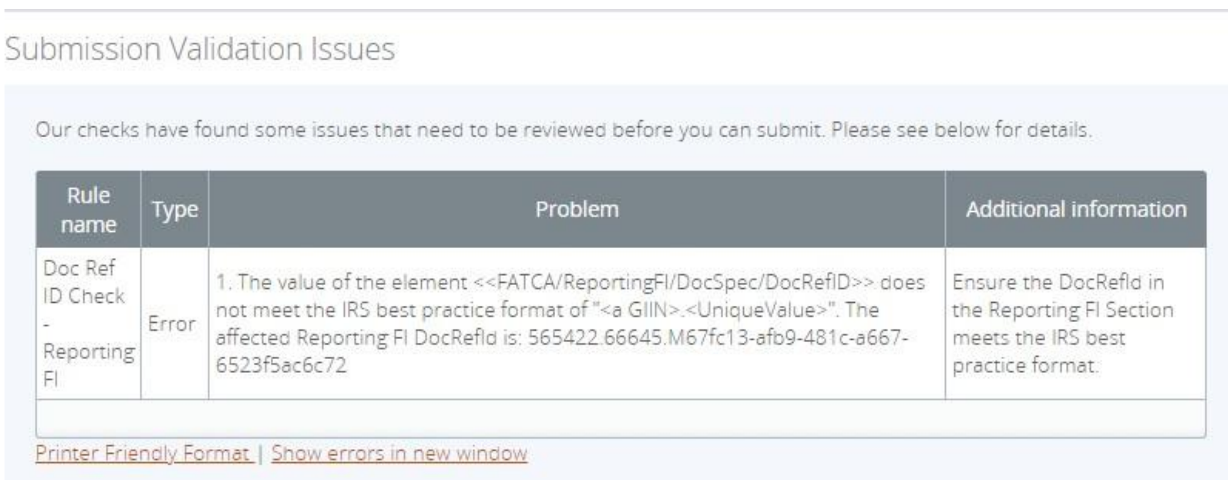
7.4 Correcting FATCA validation issues

If there are validation issues with your filing, you can view the details in order to determine any corrections that need to be made.

1. Navigate to the **Draft Filings** page using the menu at the top left of the screen. If there are errors on a filing that you have attempted to submit, the **error icon** will be displayed beside the filing's status, as shown in the image below.



2. Click on the **error icon** to display the validation errors. A sample is shown in the image below.

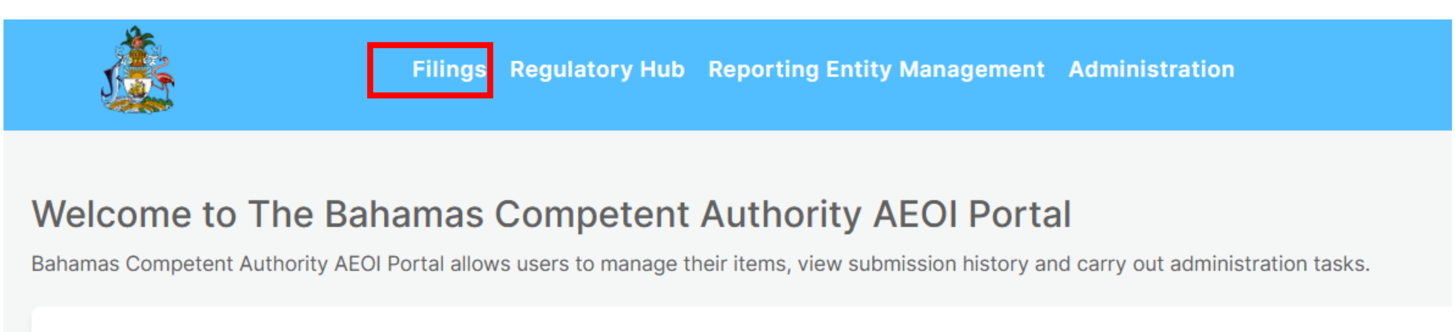


3. To correct errors and resubmit your filing, select the **Back** link at the bottom of the page to return to the **Draft Filings** page and then select the filing in question from the **Filing name** column of the table.
   a. For the **Manual Entry Filing**: Select the **Edit** link next to the form(s) that you need to correct, update the data, and select **Validate & Save**. Then follow the steps to submit the filing, as per section *2.1.4 Submitting a Manual Entry filing*.
   b. For the **XML Upload Filing**: Select the **Upload data** link and select a new XML file to upload. The system will begin validation of your new file immediately. Note: if data has already been populated into the form, you will be presented with a pop-up message that says "Do you want to delete all existing data before uploading a new file? ", and should select "Yes" to avoid further data validation issues.

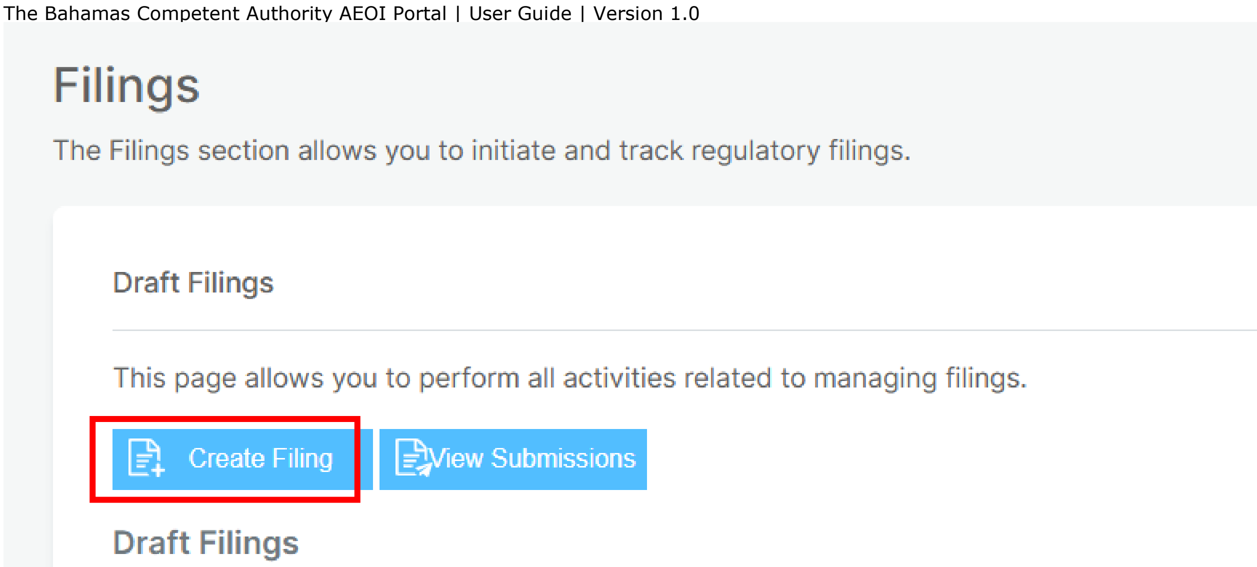
7.5 Amended Data

To amend data in a FATCA filing. Create a filing.

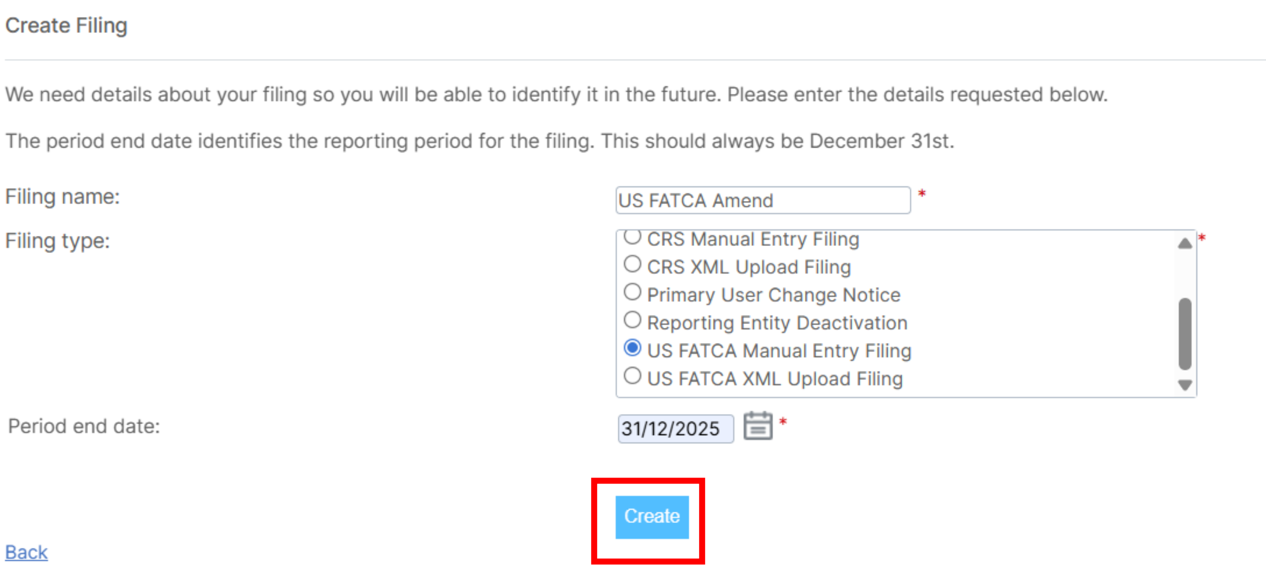
Click **Filings**.



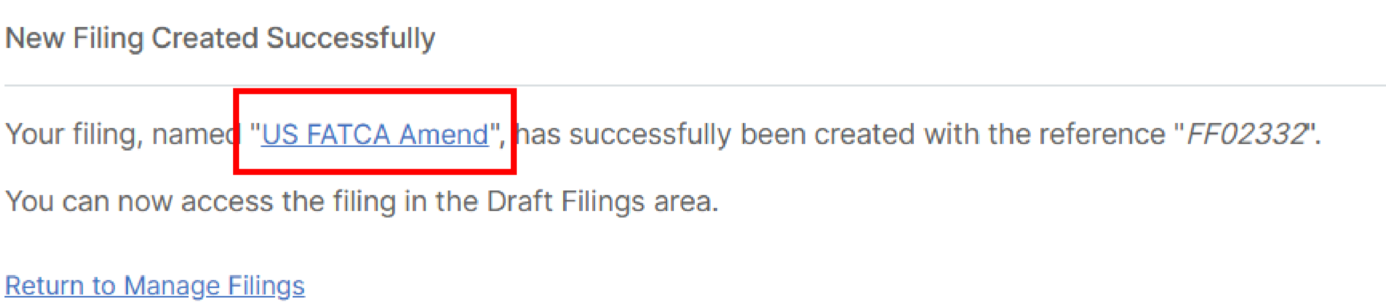
Click **Create Filing**



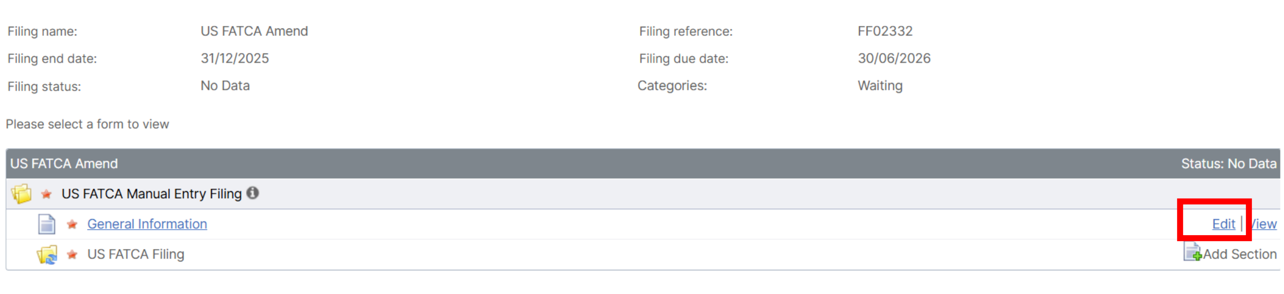
Enter **Filing Name**, Select **US FATCA Manual Entry Filing**. Enter **Period End Date.** Click **Create.**



Click **Filing Name**.

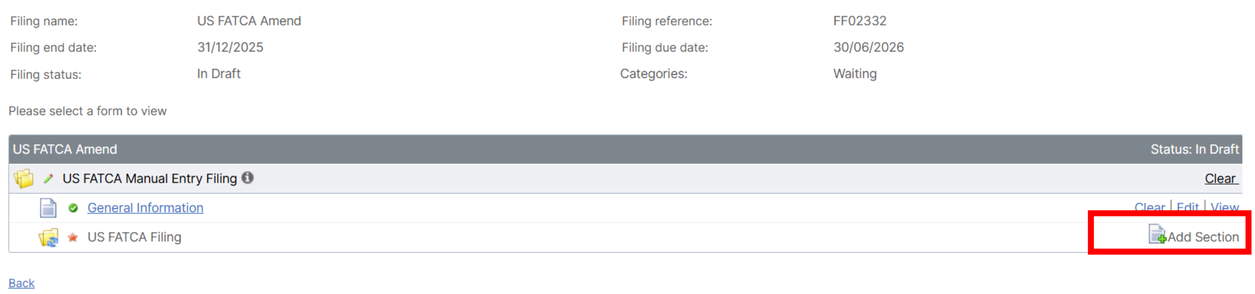


Click **Edit** for **General Information**

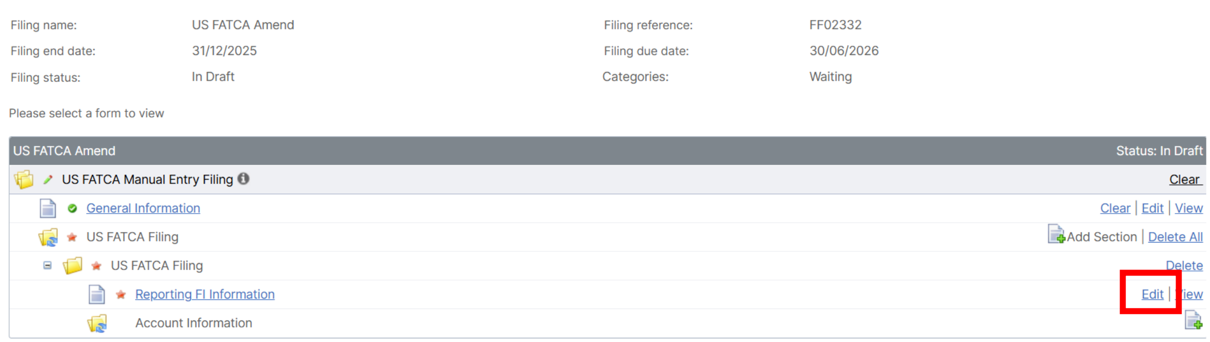


Select **Amended Data** for **Document Type**. Copy the Doc Ref ID from the original submission and paste into right hand side of the screen for the dialog box "**please enter the corresponding Message Reference here**". Click **Validate & Save**.

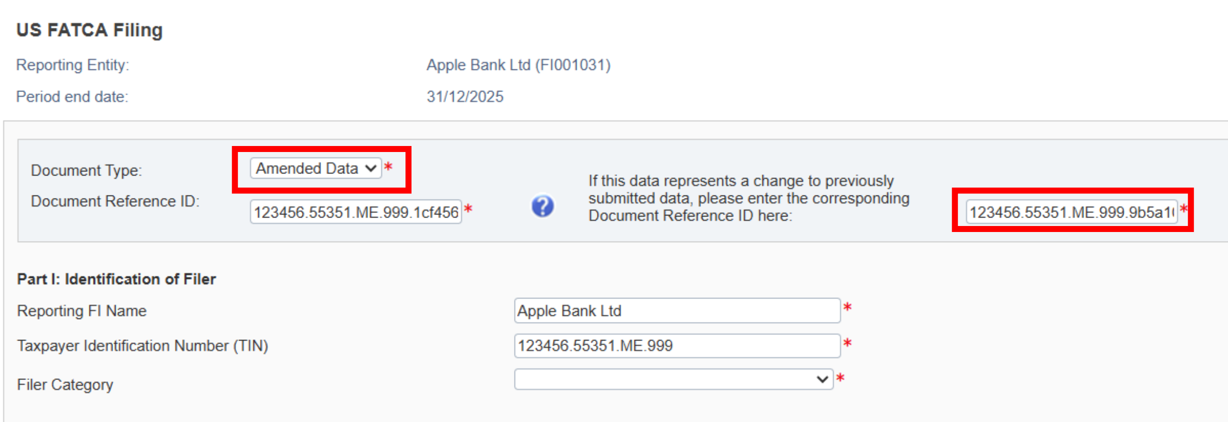
Click **Add Section**.



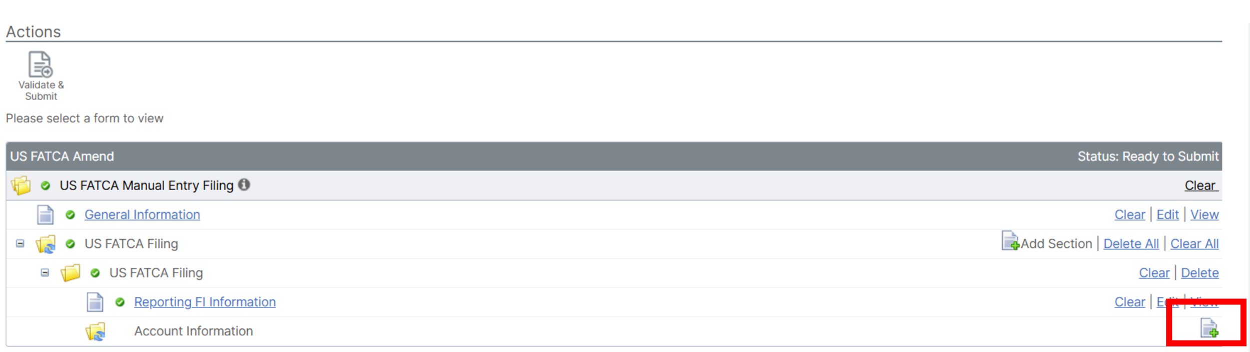
Expand **US FATCA Filing**. Click **Edit** for **Reporting FI Information**.



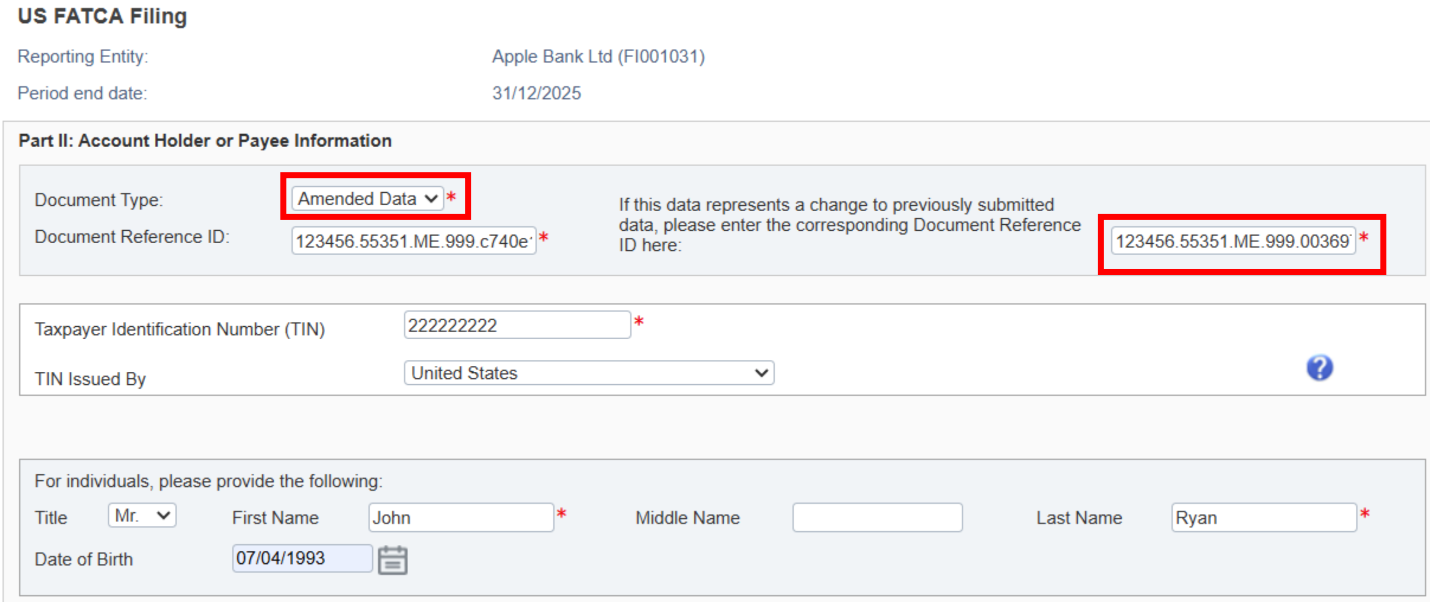
Ensure **Amended Data** is selected for **Document Type**. Copy the **Doc Ref ID** for Reporting FI Information from Original Submission and paste into right hand side of the screen for the dialog box "**please enter the corresponding Message Reference here**". Click **Validate & Save**.



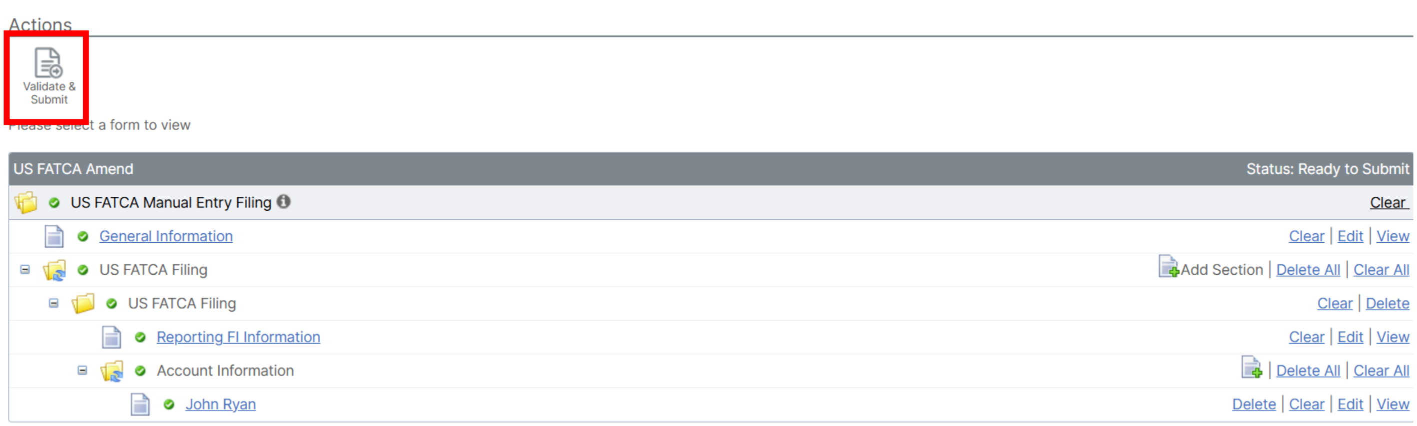
Add **Account Information**.



Ensure **Amended Data** is selected for **Document Type**. Copy the **Doc Ref ID** for Account from Original Submission and paste into right hand side of the screen for the dialog box "**please enter the corresponding Message Reference here**". Ensure all the relevant details are filled out in the form. Click **Validate & Save**.



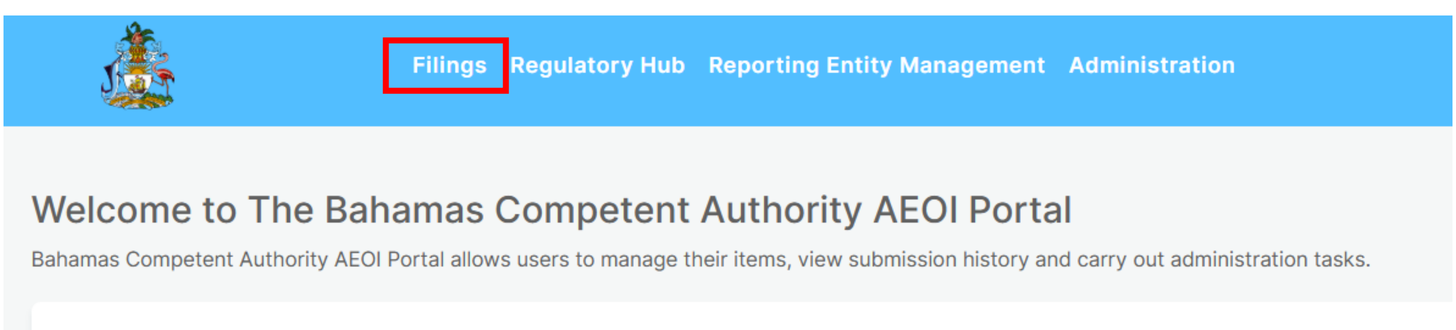
Click **Validate & Submit**.



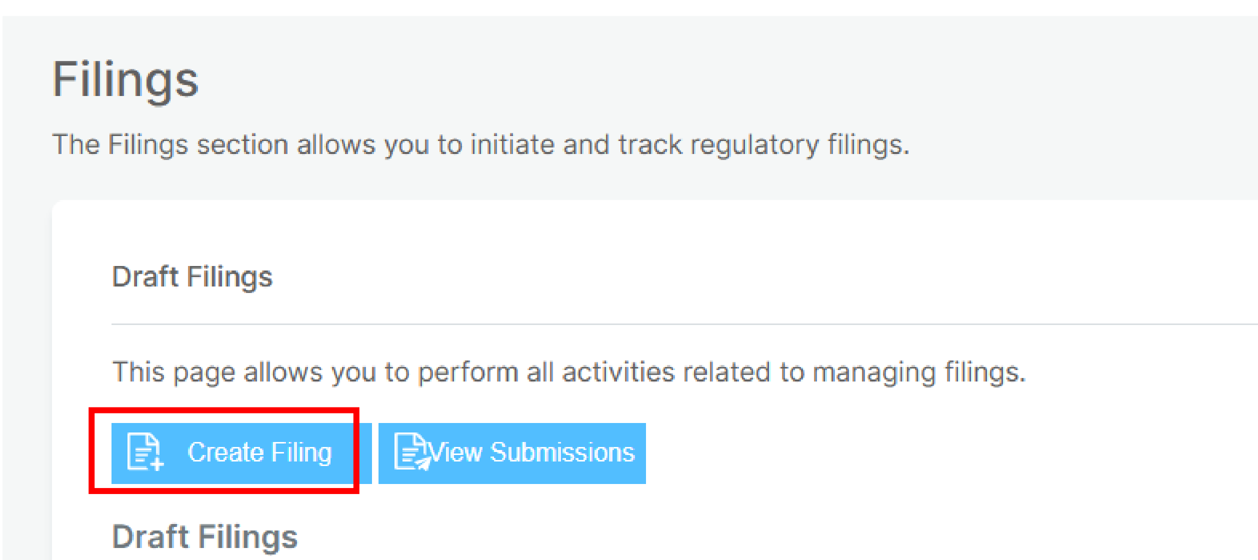
7.6 Void Data

To void data in a FATCA filing. Create a filing.

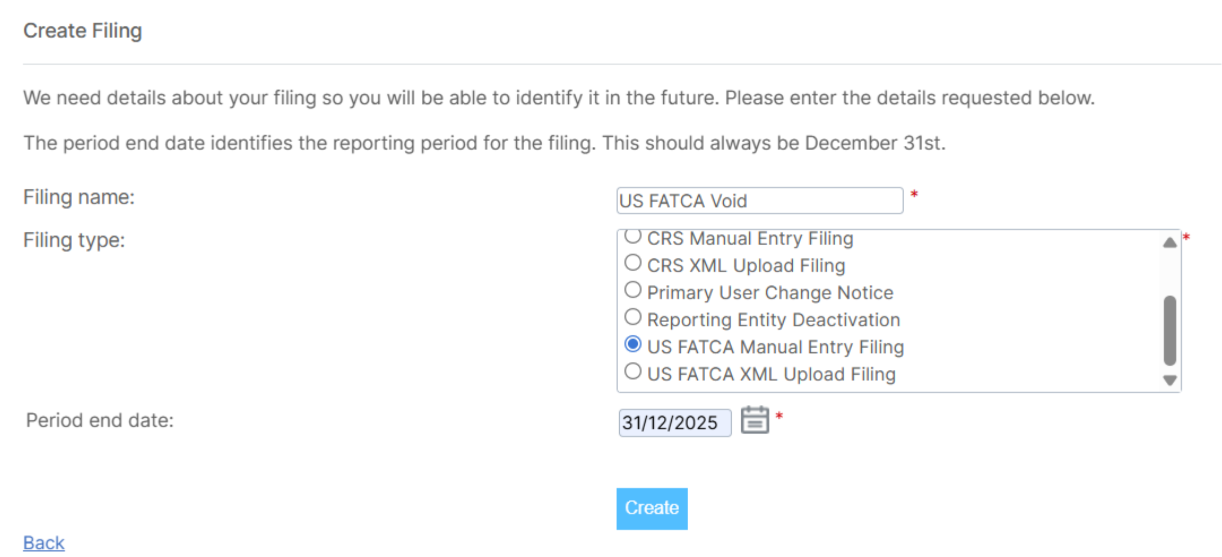
Click **Filings**.



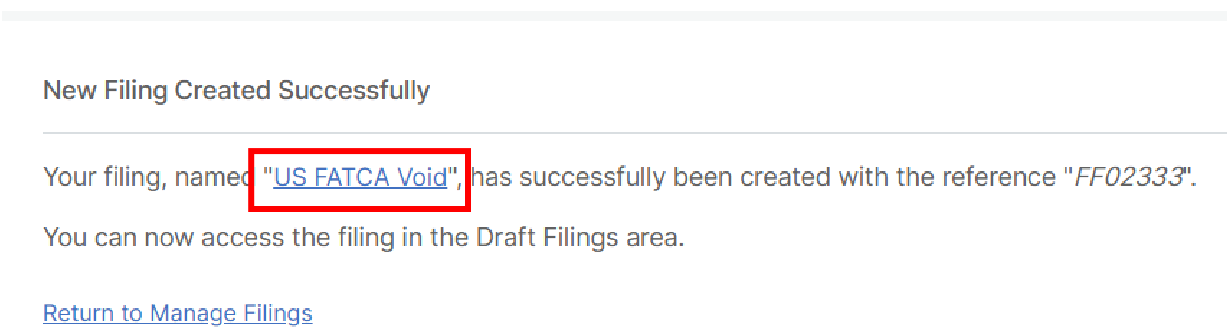
Click **Create Filing**



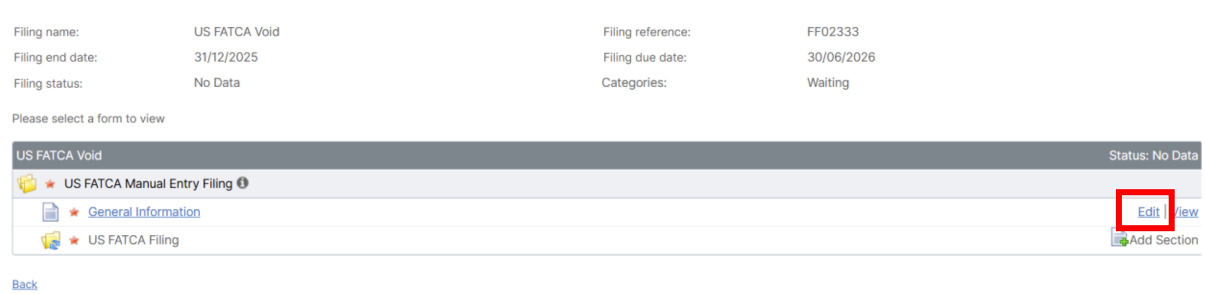
Enter **Filing Name**, Select **US FATCA Manual Entry Filing**. Enter **Period End Date.** Click **Create.**



Click **Filing Name**.

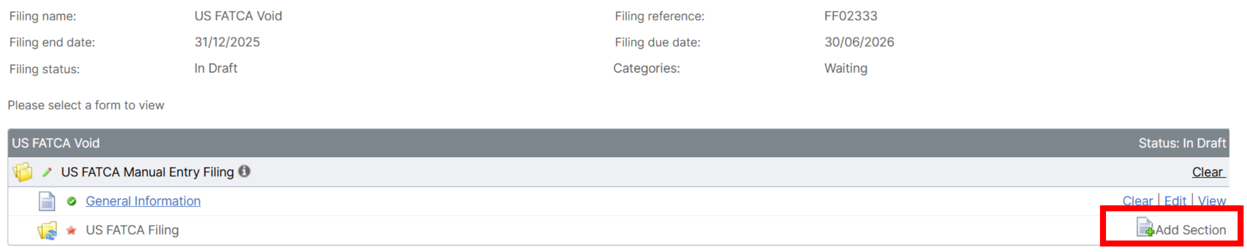


Click **Edit** for **General Information**

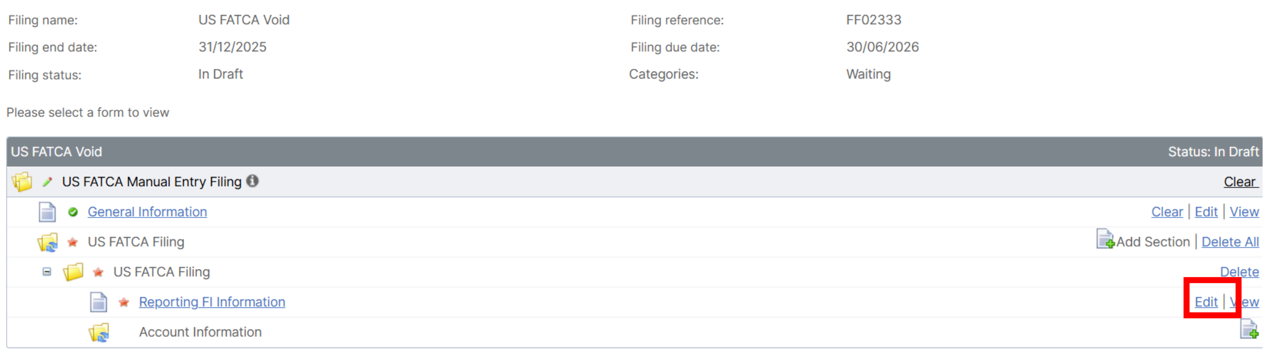


Select **Void Data** for **Document Type**. Copy the Doc Ref ID from the original submission and paste into right hand side of the screen for the dialog box "**please enter the corresponding Message Reference here**". Click **Validate & Save**.

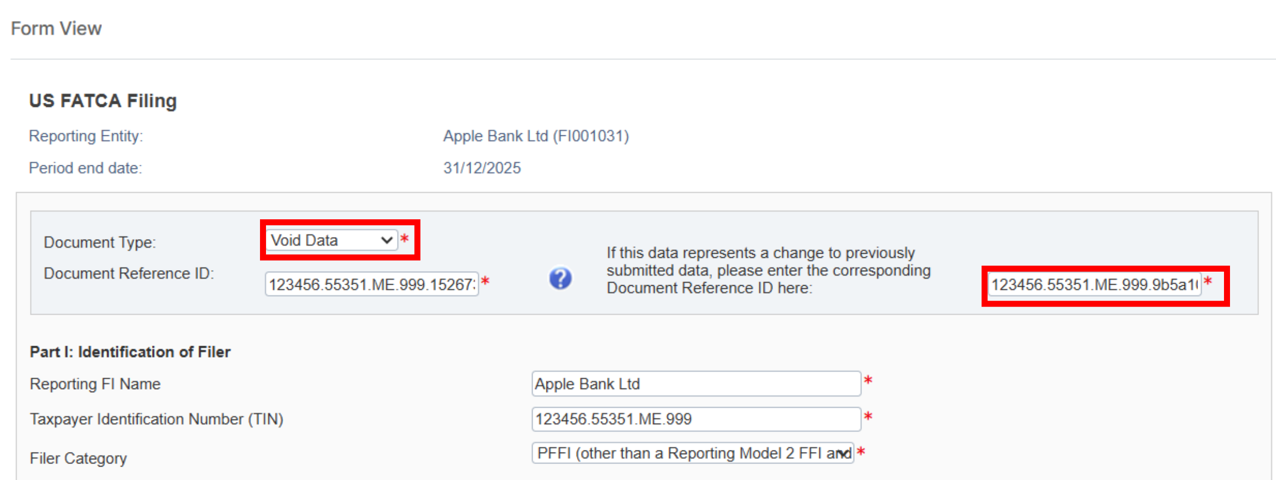
Click **Add Section** for **US FATCA Filing**



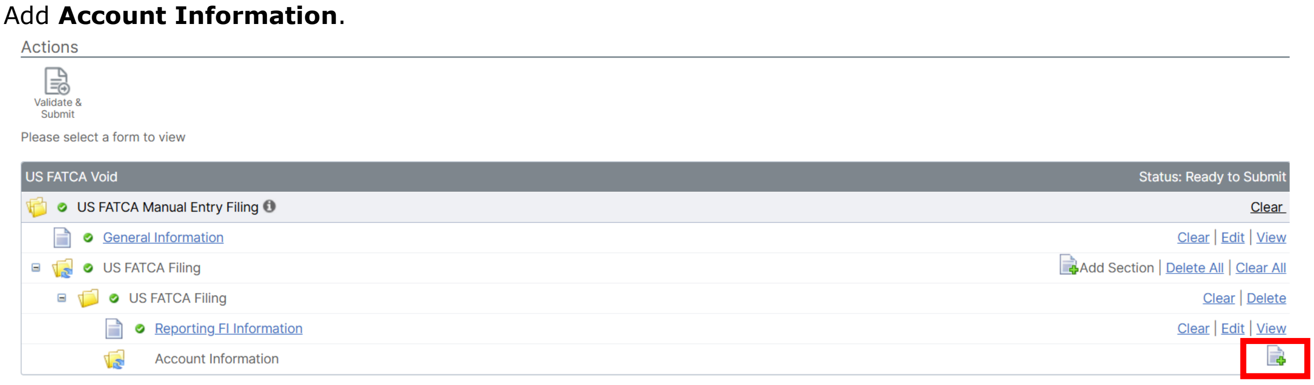
Expand **US FATCA Filing**. Click **Edit** for **Reporting FI Information**.



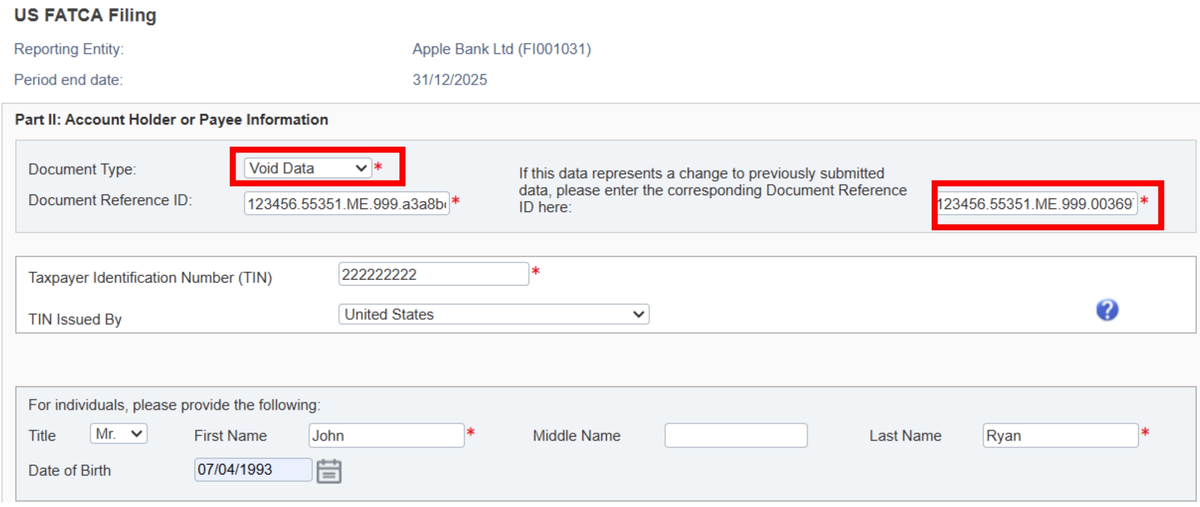
Ensure **Void Data** is selected for **Document Type**. Copy the **Doc Ref ID** for Reporting FI Information from Original Submission and paste into right hand side of the screen for the dialog box "**please enter the corresponding Message Reference here**". Click **Validate & Save**.



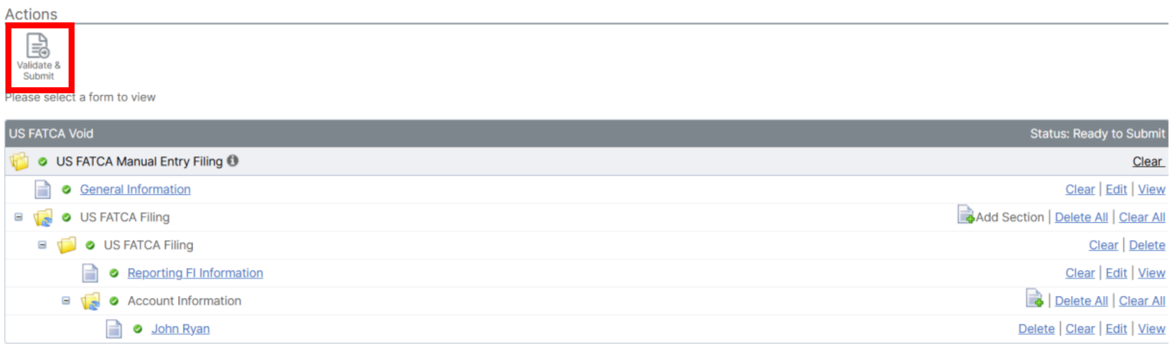
Add **Account Information**.



Ensure **Void Data** is selected for **Document Type**. Copy the **Doc Ref ID** for Account from Original Submission and paste into right hand side of the screen for the dialog box "**please enter the corresponding Message Reference here**". Ensure all the relevant details are filled out in the form. Click **Validate & Save**.



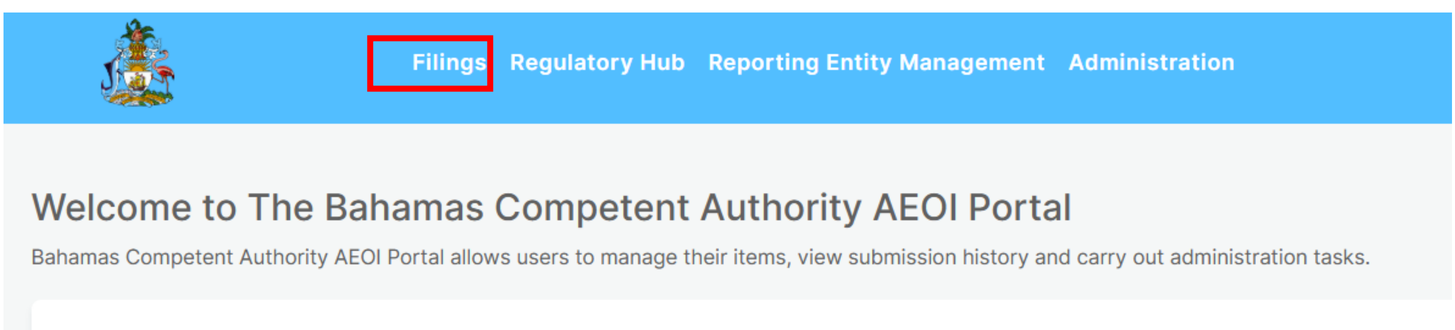
Click **Validate & Submit**



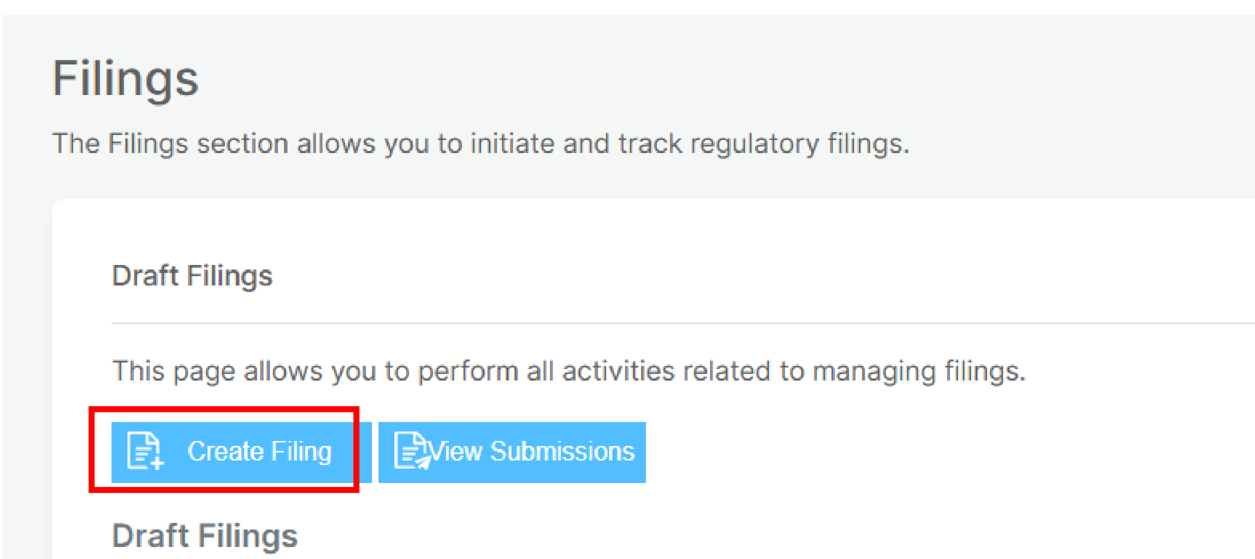
7.7 Corrected Data

To correct data in a FATCA filing. Create a filing.

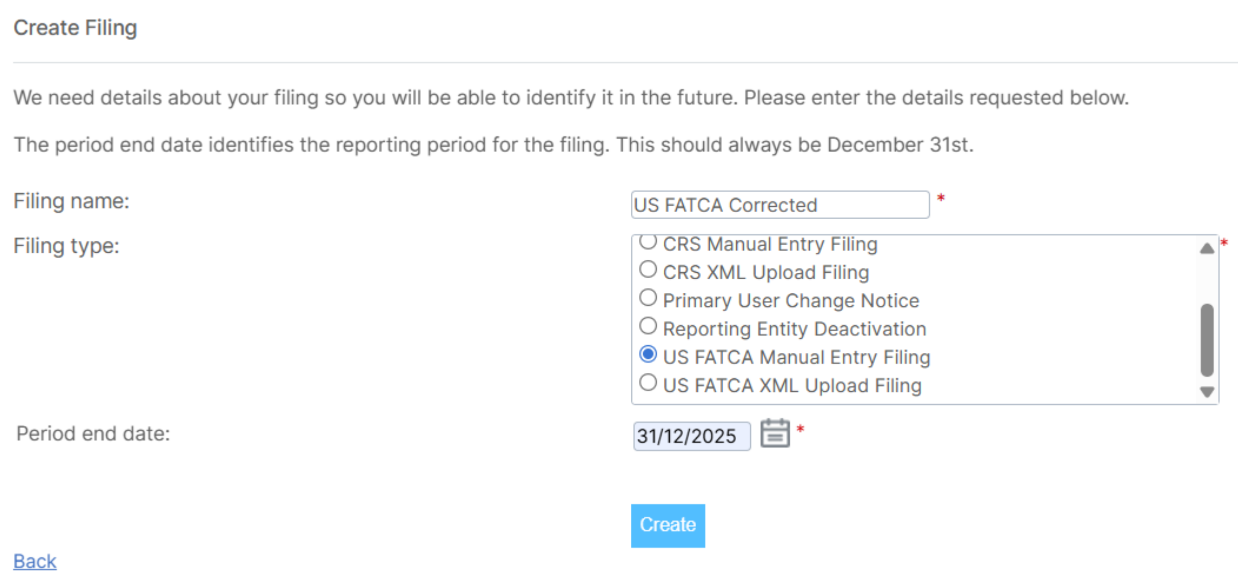
Click **Filings**.



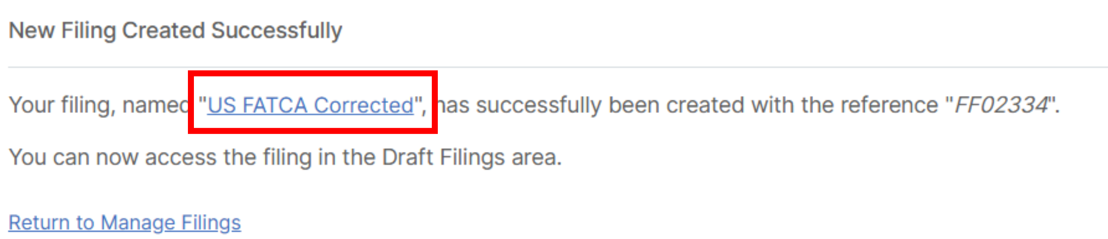
Click **Create Filing**



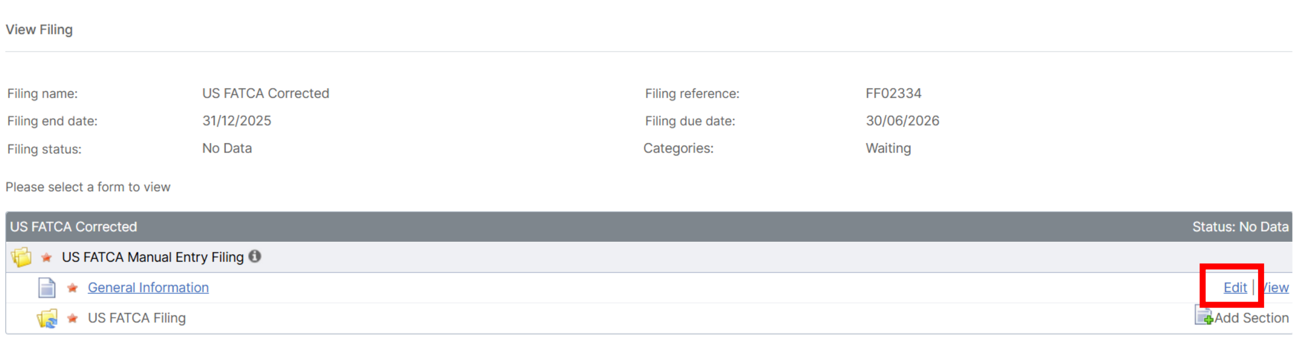
Enter **Filing Name**, Select **US FATCA Manual Entry Filing**. Enter **Period End Date.** Click **Create.**



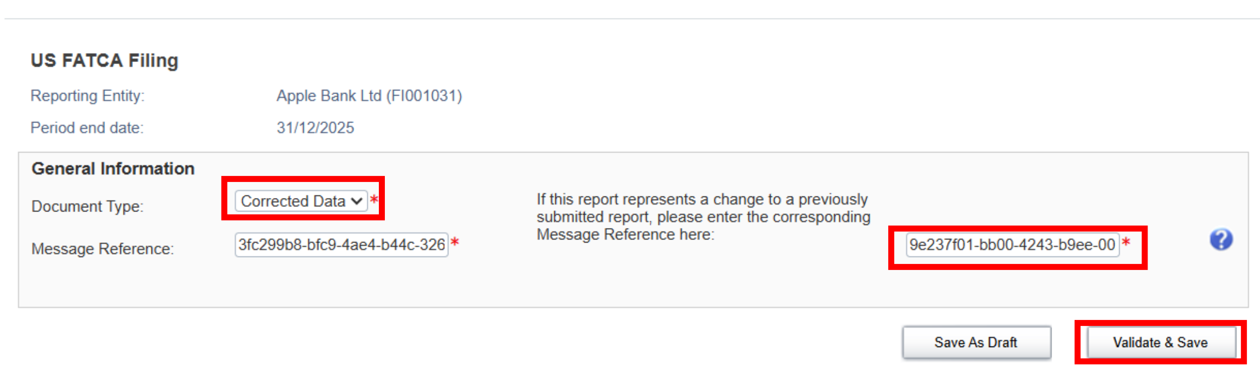
Click **Filing Name**



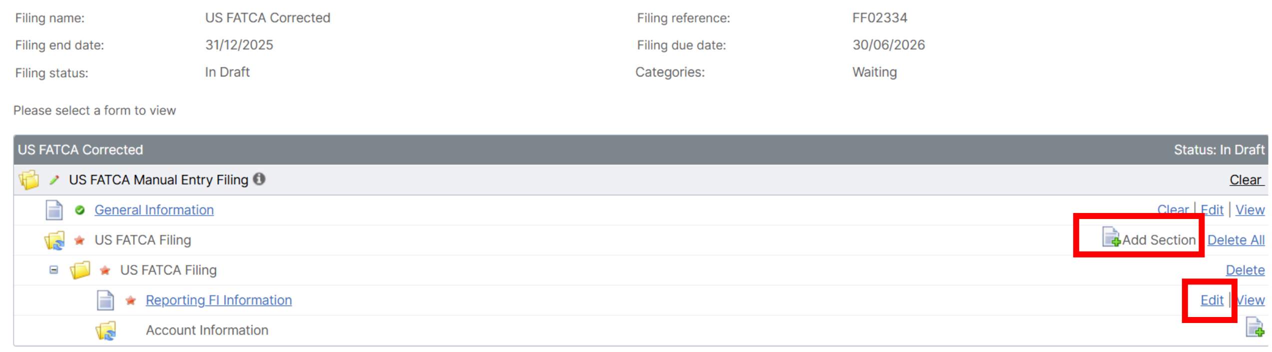
Click **Edit** for **General Information**



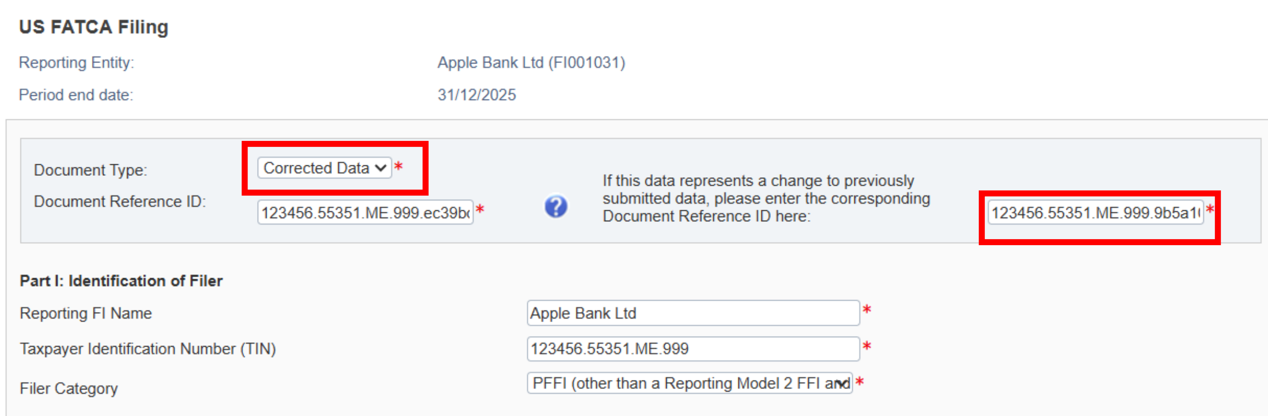
Select **Corrected Data** for **Document Type**. Copy the Doc Ref ID from the original submission and paste into right hand side of the screen for the dialog box "**please enter the corresponding Message Reference here**". Click **Validate & Save**.



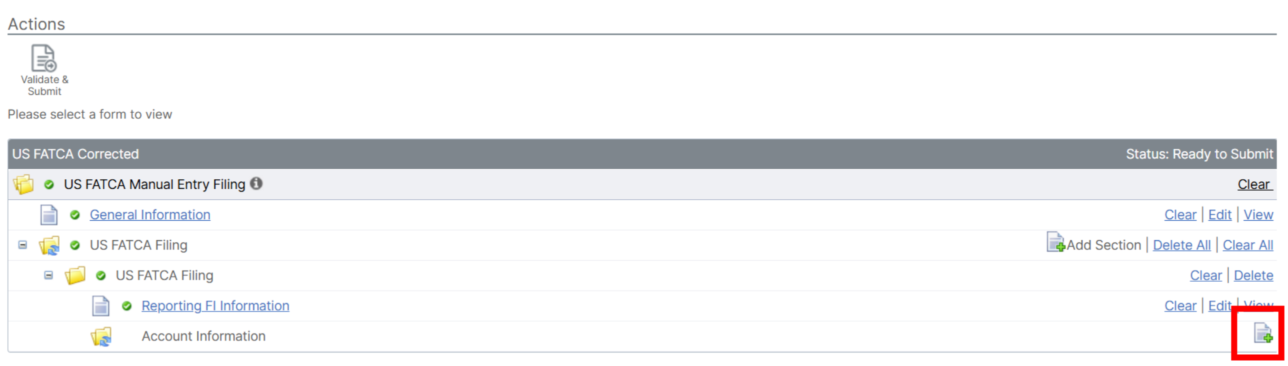
Click **Add Section** for **US FATCA Filing**. Expand **US FATCA Filing**. Click **Edit** for **Reporting FI Information**



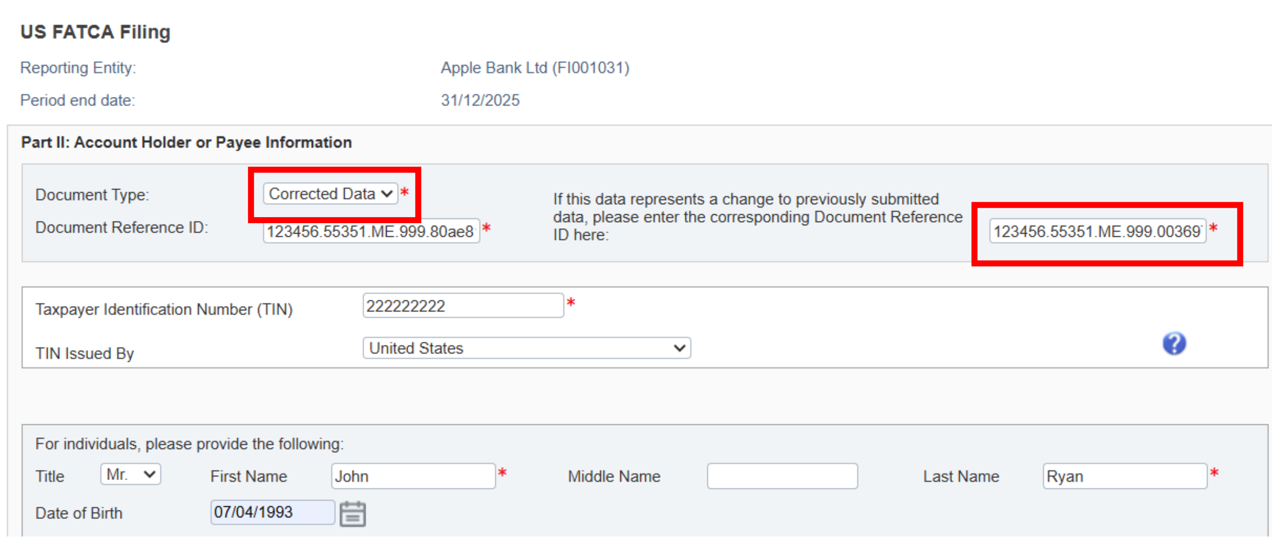
Ensure **Corrected Data** is selected for Document Type. Copy the Doc Ref ID for Reporting FI Information from Original Submission and paste into right hand side of the screen for the dialog box "please enter the corresponding Message Reference here". Click **Validate & Save**.



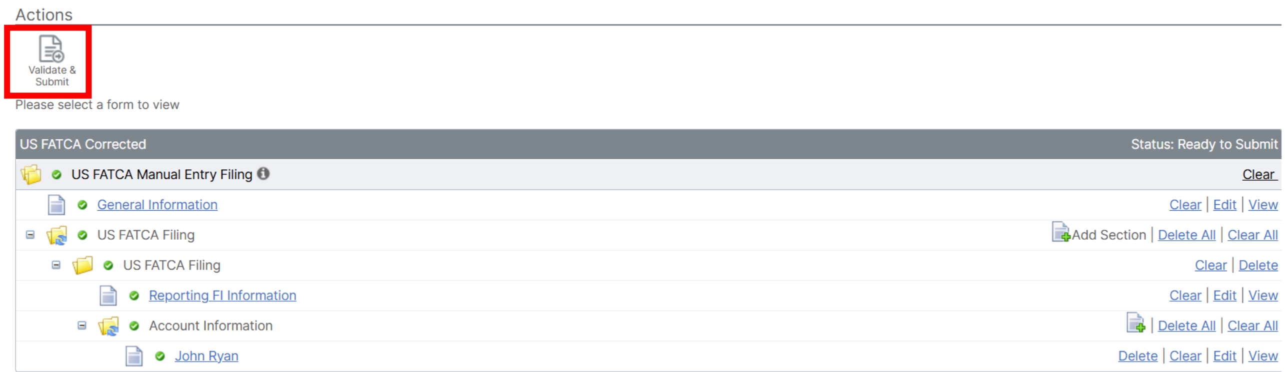
Add **Account Information**.



Ensure **Corrected Data** is selected for **Document Type**. Copy the **Doc Ref ID** for Account from Original Submission and paste into right hand side of the screen for the dialog box "**please enter the corresponding Message Reference here**". Ensure all the relevant details are filled out in the form. Click **Validate & Save**.



Click **Validate & Submit.**



7.8 IRS Notifications

After the Competent Authority transmits filings submitted via The Bahamas Competent Authority AEOI Portal to the IRS, the IRS will issue notifications that will be visible through the system. The system in turn will notify FIs of any notifications via their email addresses and FIs are required to access the system to correct their filings.

Important note: The Bahamas is a Model 1 jurisdiction, and as such all filings must be completed and submitted via The Bahamas Competent Authority AEOI Portal. IRS notifications and the IRS ICMM User Guide make reference to submitting corrections via IDES or by filing a paper submission Form 8966. Please note that these references are specific to FIs that report directly to the IRS. Bahamas Reporting Financial Institutions will receive notifications and also submit corrections via The Bahamas Competent Authority AEOI Portal.

This section of the User Guide must be read and understood in conjunction with the IRS produced instructions:

> **IRS ICMM User Guide:** https://www.irs.gov/pub/fatca/fatcareportsicmmnotificationxmlschemauserguide.pdf
>
> **IRS Notifications FAQs:** https://www.irs.gov/Businesses/Corporations/IRS-FATCA-ReportNotifications-Frequently-Asked-Questions

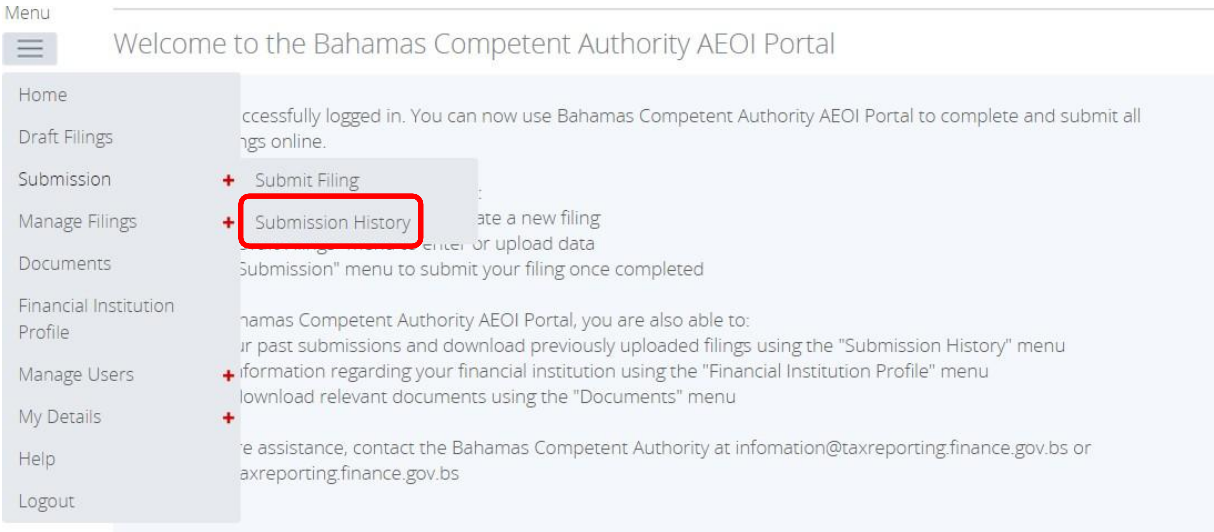
7.5.1 Viewing transmission progress and IRS notifications

When the IRS notification requires action from the Financial Institution the users for the Financial Institution will receive an email from The Bahamas Competent Authority AEOI Portal titled "Action Required for {FILING_NAME}". The email will not provide details of the notification but will inform the Financial Institution that a notification has been received from the IRS indicating that the filing contains one or more errors that must be addressed.

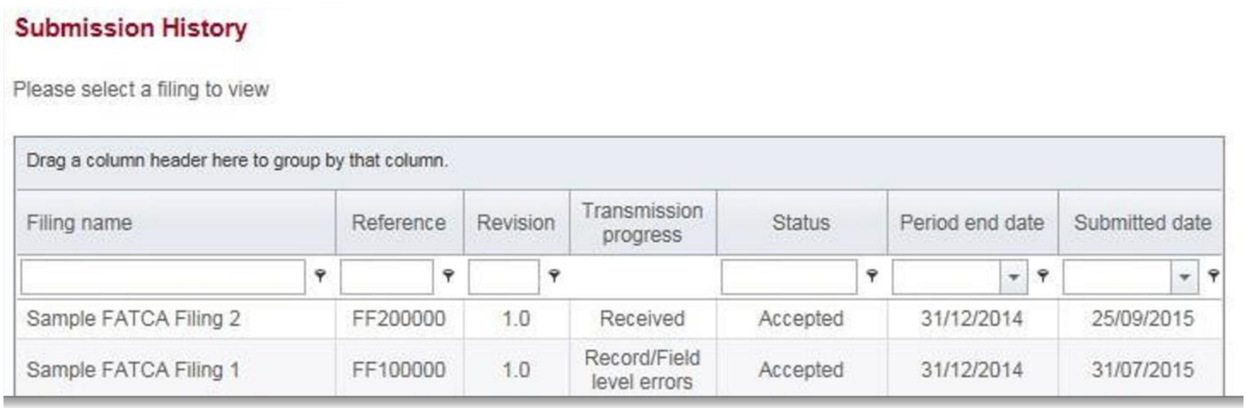
To view the transmission progress and notification(s) (where applicable) for any submitted filings, follow the steps below:

1. Log in to The Bahamas Competent Authority AEOI Portal and select the appropriate institution if you have permissions for more than one institution.

2. Navigate to **Submission** > **Submission History** using the menu at the top left of the screen.



3. You will be presented with the **Submission History** page, which presents the filings that have been submitted for your financial institution.



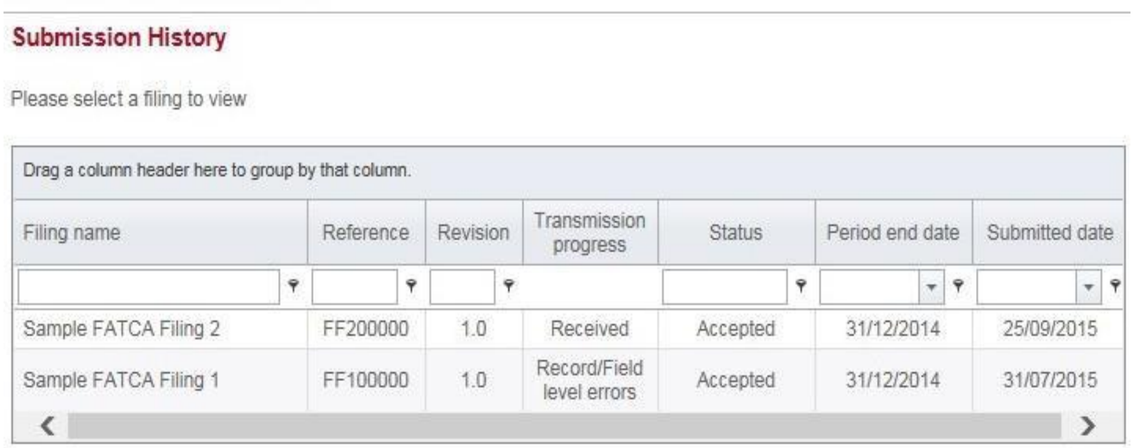
4. Review the Transmission Progress column to determine the status of your filing. When a US FATCA filing is created and submitted to the Competent Authority, it will have a Transmission Progress of "Waiting" until a response is received from the IRS. Once a response is received, the Transmission Progress for the filing will be updated to one of the following statuses, depending on the notification sent from the IRS:

Transmission Progress	Description & Next Steps
Received	A notification has been received from the IRS, indicating that no errors have been found. **No further action is required at this time.**
Record level errors; or, Record/field level errors	A notification has been received by the IRS, indicating that one or more record or field level errors exist in the filing that require correction. **For most errors, the FI must create a "Corrected" filing that references the original filing to correct the errors indicated within the notification, and submit it to the Tax Authority via The Bahamas Competent Authority AEOI Portal** **If the record has an error in the Reporting FI GIIN, the FI must first submit a Void Data filing then submit a New Data filing with a correct Reporting FI GIIN.** A list of the record/field level errors can be viewed in the [International Compliance Management Model (ICMM) Notifications User Guide.]

Failed: Invalid Message Ref ID	A notification has been received from the IRS, indicating that an invalid MessageRefID was present. **The FI must create a "New" filing with a valid MessageRefID and submit it to the Tax Authority via The Bahamas Competent Authority AEOI Portal.** The IRS guidelines for this field indicate that it should be a unique identifier for a report file and is required to be at least one, but not more than 200, alphanumeric characters and cannot be all blank characters. Note that for Manual Entry filings, this ID is autogenerated as a unique number that conforms to IRS format guidelines (i.e. is less than 200 characters)
Failed: Duplicate Message Ref ID	A notification has been received from the IRS, indicating that a duplicate MessageRefID was present. **The FI must create a "New" filing with a unique MessageRefID and submit it to the Tax Authority via The Bahamas Competent Authority AEOI Portal.** Note that for Manual Entry filings, this ID is auto-generated as a unique number that conforms to IRS format guidelines (i.e. is less than 200 characters)
Failed: Invalid Doc Ref ID	A notification has been received from the IRS, indicating that an invalid DocRefID was present. **The FI must create a "New" filing with valid DocRefIDs and submit it to the Tax Authority via The Bahamas Competent Authority AEOI Portal.** The IRS guidelines for tax year 2014 filings submitted prior to September 30th, 2015 indicate that this field should be a unique identifier for a report file and is required to be at least one, but not more than 200, alphanumeric characters and cannot be all blank characters. As of January 1, 2016, they will issue Invalid Doc Ref ID notifications for any ID that does not meet the new format requirements of <Reporting FI GIIN>.<Unique Identifier>

5. Select the name of the filing you wish to view from the **Filing name** column of the Submission History tab

6.



Submission History

Please select a filing to view

Drag a column header here to group by that column.

Filing name	Reference	Revision	Transmission progress	Status	Period end date	Submitted date
Sample FATCA Filing 2	FF200000	1.0	Received	Accepted	31/12/2014	25/09/2015
Sample FATCA Filing 1	FF100000	1.0	Record/Field level errors	Accepted	31/12/2014	31/07/2015

7. Select the **View Comments** icon and click the file attachment to download the IRS notification in XML format. We recommend opening the file with Internet Explorer for ease of viewing.

8. The image below shows how the IRS notification will look once opened. More detail on the structure and content of this file can be found in the International Compliance Management Model (ICMM) Notifications User Guide and FAQs.

```
+ <ds:KeyInfo Id="id-c6dd9730ce264ff17197afad59b707d809c0bba6">
- <ds:Object Id="id-8e56c5941fb7cf803fba8feecc87c1361f10afcb">
  - <ns2:FATCAValidFileNotification xmlns:ns4="urn:fatca:fatcafileerrornotification"
    xmlns:ns3="urn:fatca:fatcapaperrecorderrornotification" xmlns:ns2="urn:fatca:fatcavalidfilenotification"
    xmlns="urn:fatca:fatcanotificationbase">
    - <FATCANotificationHeaderGrp>
        <FATCANotificationCreateTs>2015-10-21T01:33:25Z</FATCANotificationCreateTs>
        <FATCANotificationRefId>42609</FATCANotificationRefId>
        <FATCANotificationCd>NVF</FATCANotificationCd>
        <FATCAEntitySenderId>000000.00000.TA.840</FATCAEntitySenderId>
        <FATCAEntityReceiverId>000000.00000.TA.092</FATCAEntityReceiverId>
        <ContactInformationTxt>http://www.irs.gov/Businesses/Corporations/FATCA-Error-
          Notifications</ContactInformationTxt>
      </FATCANotificationHeaderGrp>
    - <OriginalFileMetadataGrp>
        <IDESTransmissionId>092FOdvLmMwii+0V8tXYcujFj1HBA7EX</IDESTransmissionId>
        <IDESSendingTs>2016-03-20T19:41:29.029Z</IDESSendingTs>
        <SenderFileId>20150320T192207783Z_000000.00000.TA.092.zip</SenderFileId>
      </OriginalFileMetadataGrp>
    - <OriginalFileMessageSpecGrp>
        <MessageRefId>SampleMessageRefID</MessageRefId>
        <SendingCompanyGIIN>123456.12345.BR.092</SendingCompanyGIIN>
        <TransmittingCountryCd>VG</TransmittingCountryCd>
        <ReceivingCountryCd>US</ReceivingCountryCd>
        <MessageTypeCd>FATCA</MessageTypeCd>
        <ReportingPeriodDt>2014-12-31Z</ReportingPeriodDt>
      </OriginalFileMessageSpecGrp>
      <NotificationContentTxt>The IRS has determined that the referenced file is in a valid format. Individual
        records submitted within the file have been processed and any errors detected during processing are
        provided in the Error Details included. For more information about record level errors, including their
        classification under an intergovernmental agreement (IGA), see:
        http://www.irs.gov/Businesses/Corporations/FATCA-Error-Notifications</NotificationContentTxt>
    - <OriginalFileProcessingDataGrp>
        <FileTypeCd>NEW</FileTypeCd>
        <FinancialInstitutionCnt>1</FinancialInstitutionCnt>
        <RecordCnt>2</RecordCnt>
        <DupAccountReportRecordCnt>0</DupAccountReportRecordCnt>
        <NonDupAccountReportRecordCnt>2</NonDupAccountReportRecordCnt>
        <PooledReportRecordCnt>0</PooledReportRecordCnt>
      </OriginalFileProcessingDataGrp>
      <HCTATreatyStampTxt>This information is furnished under the provisions of an income tax treaty, tax
        information exchange agreement (TIEA), or other agreement for the exchange of information with a
        foreign government, and its use and disclosure must be governed by the provisions of that treaty,
        TIEA, or other agreement.</HCTATreatyStampTxt>
```


7.5.2 Understanding IRS ICMM Notifications

Once the IRS notification is downloaded from The Bahamas Competent Authority AEOI Portal, it must be examined to determine the errors that must be corrected. The critical sections of the notification file are highlighted below; however, the IRS ICMM User Guide and FAQs should be referenced during this process.

IRS ICMM User Guide: https://www.irs.gov/pub/fatca/fatcareportsicmmnotificationxmlschemauserguide.pdf
IRS Notifications FAQs: https://www.irs.gov/Businesses/Corporations/IRS-FATCA-ReportNotifications-Frequently-Asked-Questions

1. **<FATCANotificationCd> -** This element identifies the type of notification received. These codes are further explained in the ICMM User Guide


```
- <FATCANotificationHeaderGrp>
    <FATCANotificationCreateTs>2015-10-21T01:33:25Z</FATCANotificationCreateTs>
    <FATCANotificationRefId>42609</FATCANotificationRefId>
    <FATCANotificationCd>NVF</FATCANotificationCd>
    <FATCAEntitySenderId>000000.00000.TA.840</FATCAEntitySenderId>
    <FATCAEntityReceiverId>000000.00000.TA.092</FATCAEntityReceiverId>
```


2. **<NotificationContentTxt>** - This element will explain, at a high level, the result of the IRS review of your submission

```
<NotificationContentTxt>The IRS has determined that the referenced file is in
    a valid format. Individual records submitted within the file have been
    processed and any errors detected during processing are provided in the
    Error Details included. For more information about record level errors,
    including their classification under an intergovernmental agreement
    (IGA), see: http://www.irs.gov/Businesses/Corporations/FATCA-Error-
    Notifications</NotificationContentTxt>
```


3. **<FATCARecordErrorGrp>** - Within the FATCARecordErrorGrp, the notification will include a RecordLevelErrorCd for each applicable erroneous record in the submission. The ICMM User Guide describes the possible values for RecordLevelErrorCd.


```
- <ns2:FATCARecordErrorGrp>
    <RecordErrorInfoHeaderTxt>Record level error details from the file submitted are
        provided and are organized by financial
        institution.</RecordErrorInfoHeaderTxt>
  - <ns2:FATCARecordErrorFIGrp>
      <ReportingFINm>Sample Reporting FI Name</ReportingFINm>
    - <ns2:FATCARecordErrorDetailGrp>
        <FATCAReportTypeCd>ACCOUNT_REPORT</FATCAReportTypeCd>
        <DocTypeIndicCd>FATCA1</DocTypeIndicCd>
        <DocRefId>SampleGIIN.001</DocRefId>
        <RecordLevelErrorCd>8007</RecordLevelErrorCd>
```


4. **<FieldErrorGrp>** - For record-level error codes 8001 (Pooled Report Error) and 8007 (Account Report Error) the notifications will contain a “FieldErrorGrp” for each field-level error, with the XML path for the data element (“FieldNm”) in error and description of the error (“FieldErrorTxt”). Fieldlevel error types are provided alphabetically by description in Figure 4-2 of the ICMM User Guide. Each field-level error must be corrected in a Corrected submission through The Bahamas Competent Authority AEOI Portal.


```
- <FieldErrorGrp>
    <FieldNm>ReportingFI/TIN</FieldNm>
    <FieldErrorTxt>GIIN not populated</FieldErrorTxt>
  </FieldErrorGrp>
- <FieldErrorGrp>
    <FieldNm>ReportingGroup/AccountReport/AccountHolder/Organisation/TIN;
      ReportingGroup/AccountReport/AccountHolder/Individual/TIN</FieldNm>
    <FieldErrorTxt>TIN not valid</FieldErrorTxt>
  </FieldErrorGrp>
```


Important Note: all Record-Level Notifications generated for the 2014 reporting year only regarding the absence of an Account Holder TIN and/or date of birth may be ignored. Upon review of the notification file received from the IRS; if the only error described is the absence of an Account Holder TIN or date of birth, there is no requirement to submit a corrected filing. Note that for tax year 2015, either the Account Holder TIN or date of birth must be provided. For tax year 2016 and beyond, the Account Holder TIN field is mandatory.

7.5.3 Submitting Corrected Filings

If a correction is required, follow the same process outlined in Section 6.3 to create and submit a “Corrected Data” filing, which includes the new or updated data requested in the IRS notification. Submitting a “Corrected Data” filing is different than submitting a “New Data” filing in the following ways:

- Document Type: select “FATCA2 – Corrected Data”
- Corresponding Message Reference ID: enter the Message Reference from the original “New Data” filing

- Corresponding Document Reference IDs: enter the Document Reference IDs of the appropriate section(s) from the original New Data filing

Note that only the record(s) with the corrected data needs to be resubmitted via a "Corrected" filing. However, since the record must be transmitted in a valid FATCA file, the filing must have sufficient data from the original file to pass schema validation and other checks, including a complete **General Information form** and **Reporting FI Information** form (or MessageSpec and Reporting FI data elements for XML submissions).

Important note: The IRS has specified that for filings with Record/Field Level Errors, if the record has an error in the Reporting FI GIIN, the original record must be voided and a new record submitted to correct the GIIN. This means that the FI must first submit a **Void Data filing (Document Type: "FATCA3 – Void Data), then submit a New Data filing (Document Type: "FATCA1 – New Data") with a correct Reporting FI GIIN.** If applicable, this guidance can be found within the <ActionRequestedTxt> field in the IRS notification. Void Data Filings must include the **exact same data** as was included in the original filing, but with an updated Document Type, Document Reference IDs, and Corresponding Document Reference IDs.

Important note: Filings with the below Transmission Progress categories must submit a **New Data filing (Document Type: "FATCA1 – New Data")**, as opposed to a Corrected filing, as the issue relates to the core references used to identify the file:

- Failed: Invalid Message Ref ID (<FATCANotificationCd> = NMR)
- Failed: Duplicate Message Ref ID (<FATCANotificationCd> = NDM)
- Failed: Invalid Doc Ref ID (<FATCANotificationCd> = NDR)

Please see *Section 5.1 - Viewing transmission progress & IRS notifications* for more information on each Transmission Progress category.

7.5.4 Additional US FATCA Guidance

This section includes general information you should reference throughout the US FATCA reporting process. For additional detail on these topics, please see the IRS FATCA XML User Guide or FAQs.

Document Reference IDs:

- The IRS has introduced new format requirements for Document Reference IDs that came into effect in January 2016. New validation has been added to The Bahamas Competent Authority AEOI Portal to check that all Document Reference IDs submitted within US FATCA filings conform to the new requirements. The IRS required format is **<ReportingFIGIIN>.<UniqueValue>**. More information can be found here: http://www.irs.gov/Businesses/Corporations/FATCA-XML-Schemas-Best-Practices-forForm-8966-DocRefID
- The ReportingFIGIIN within the Document Reference IDs must match the GIIN entered in the Reporting FI TIN field on the Reporting FI Information form (for manual entry filings), or the TIN item within the Reporting FI group (for XML filings) in order to be accepted into the The Bahamas Competent Authority AEOI Portal.

Account Holder Type:

- When submitting an account report, if the reported financial account is held by an **individual,** the filer must not make a selection for Account Holder Type within the Account Report form (it should be left blank). The individual's First Name and Last Name must be completed when the account holder is an individual.
- If the reported financial account is held by an **entity**, selection of one Account Holder Type is required. Entity Name must be completed when the account holder is an entity.

Prohibited Characters:

- The following IRS prohibited characters must not be included in any filings as this will prevent successful submission in The Bahamas Competent Authority AEOI Portal:
    - Double Dash (--)
    - Slash Asterisk (/*)
    - Ampersand Hash (&#)
- The following IRS prohibited characters must not be included in any **XML Upload** filings as this will prevent successful submission in The Bahamas Competent Authority AEOI Portal. These characters **are** allowed in the Manual Entry filing, as they will be transformed to their escaped formats upon export:
    - Ampersand (&)
    - Less than (<)
    - Greater than (>)
    - Apostrophe (‘)
    - Quotation Mark (“)
- More information can be found at https://www.irs.gov/Businesses/Corporations/FATCA-XML-Schema-Best-Practices-for-Form-8966

Account Number

- If you do not have an account number for one or more reported accounts, note that the IRS guidance is to “provide the unique identifier used by the financial institution to identify the account holder or payee. If no account numbering system, then state “NANUM” for no account number”.

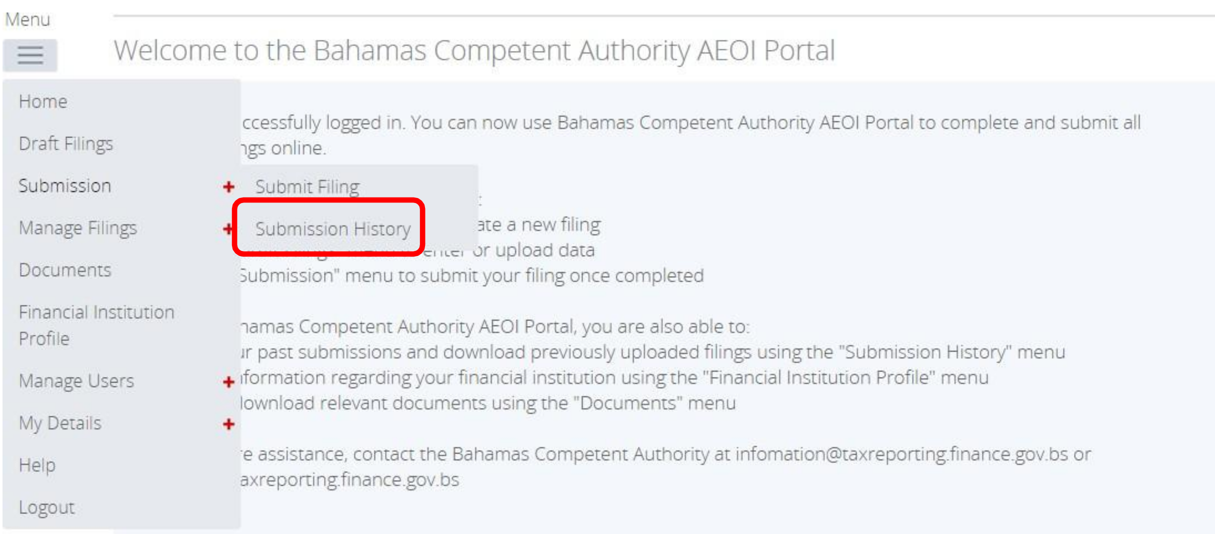
8 Viewing previously submitted filings

8.1 Viewing submission history

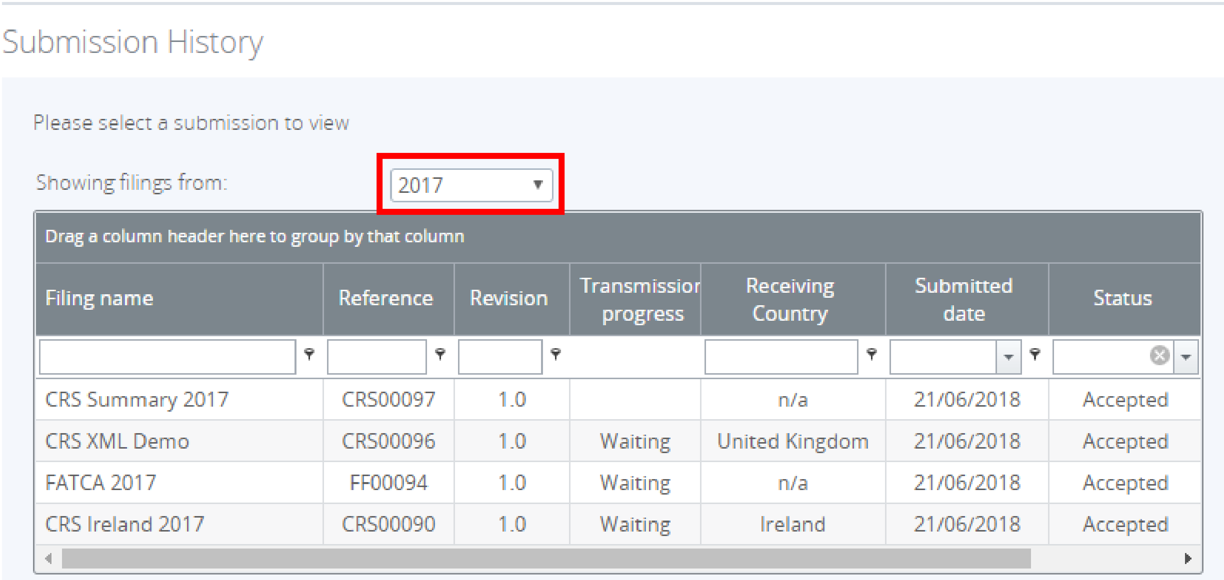
To view the history of all submitted filings for your Financial Institution, follow the steps below:

1. Log in to **The Bahamas Competent Authority AEOI Portal**, and select the appropriate entity (if you have permissions for more than one entity).

2. Navigate to **Submission** > **Submission History** using the menus at the top of the screen.



3. You will be presented with the **Submission History** page, which presents the filings that have been submitted for your Financial Institution. Select the **year** you want to see the submissions for.



4. Select the name of the filing you wish to view from the **Filing name** column of the Submission History tab

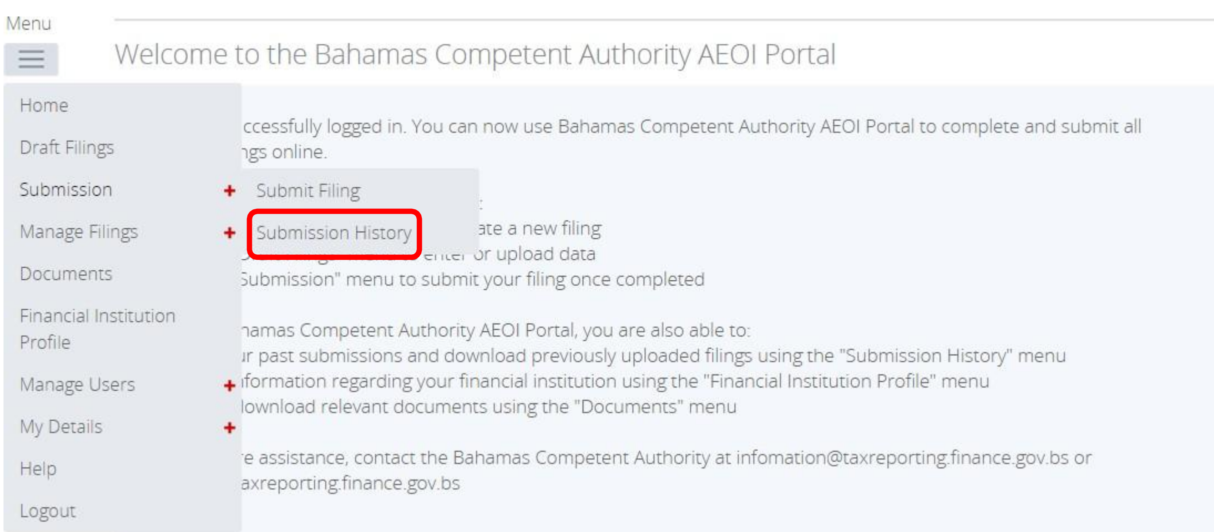
5. You will be presented with the **View Filing** page for the selected filing.

6. Select the appropriate form to review the submitted data in read-only format.

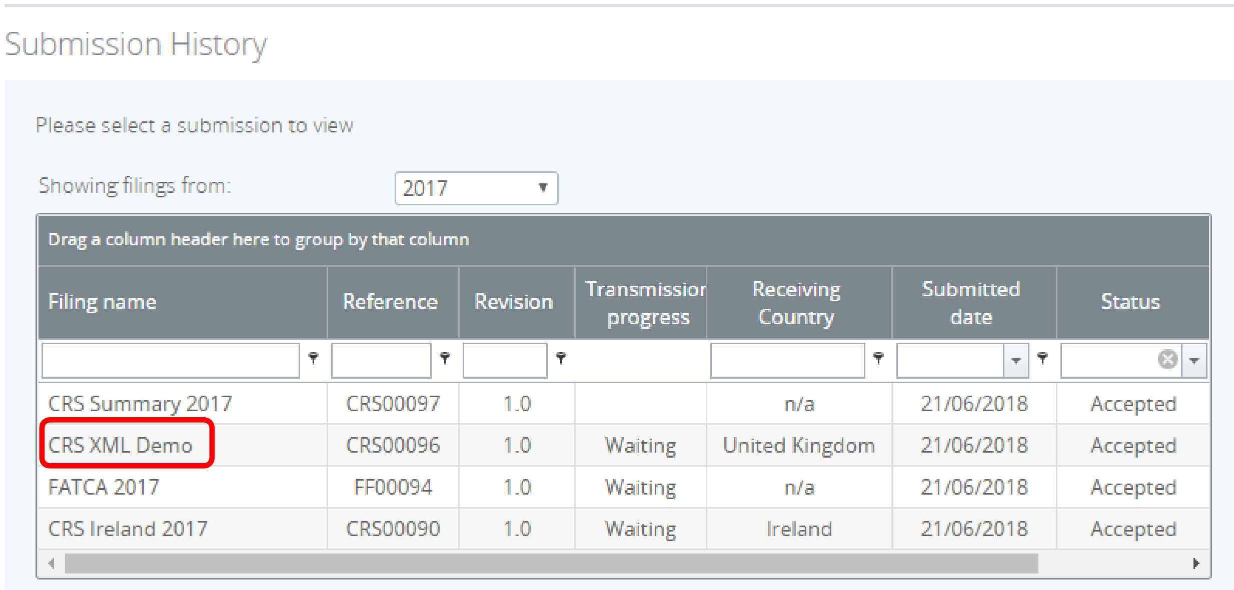
8.2 Downloading previously submitted (uploaded) XML files

For previously submitted XML Upload filings, you can also view the full history of XML files uploaded.

1. Navigate to **Submission** > **Submission History** using the menus at the top of the screen.

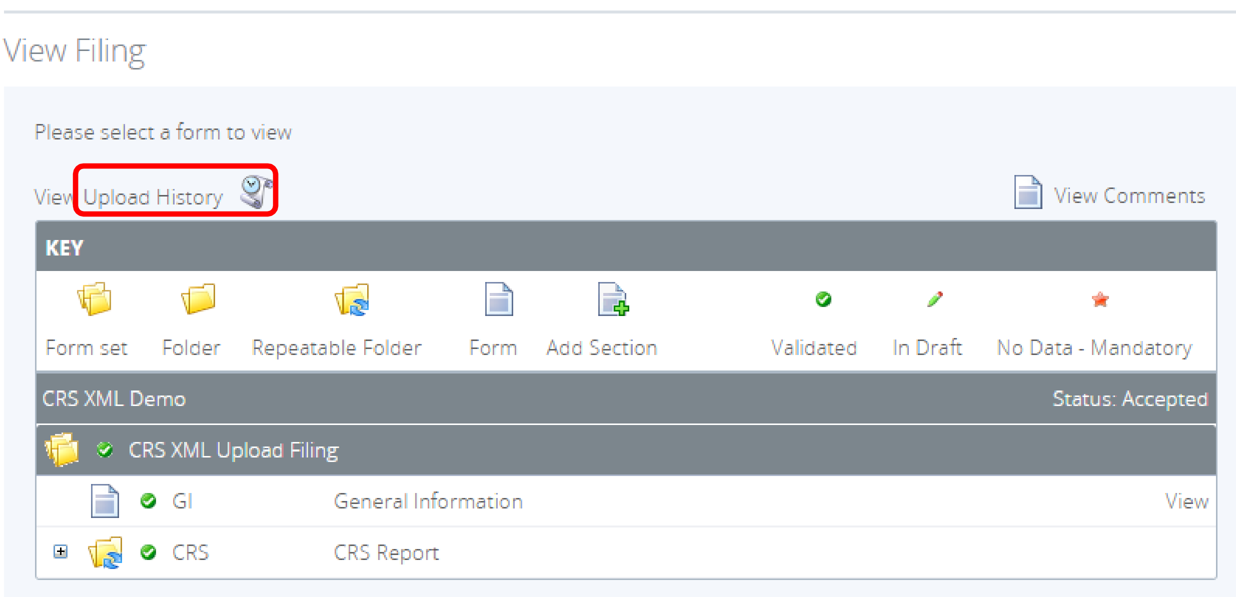


2. You will be presented with the **Submission History** page, which presents the filings that have been submitted for your financial institution.



3. Select the name of the XML Upload filing you wish to view from the **Filing name** column of the Submission History.

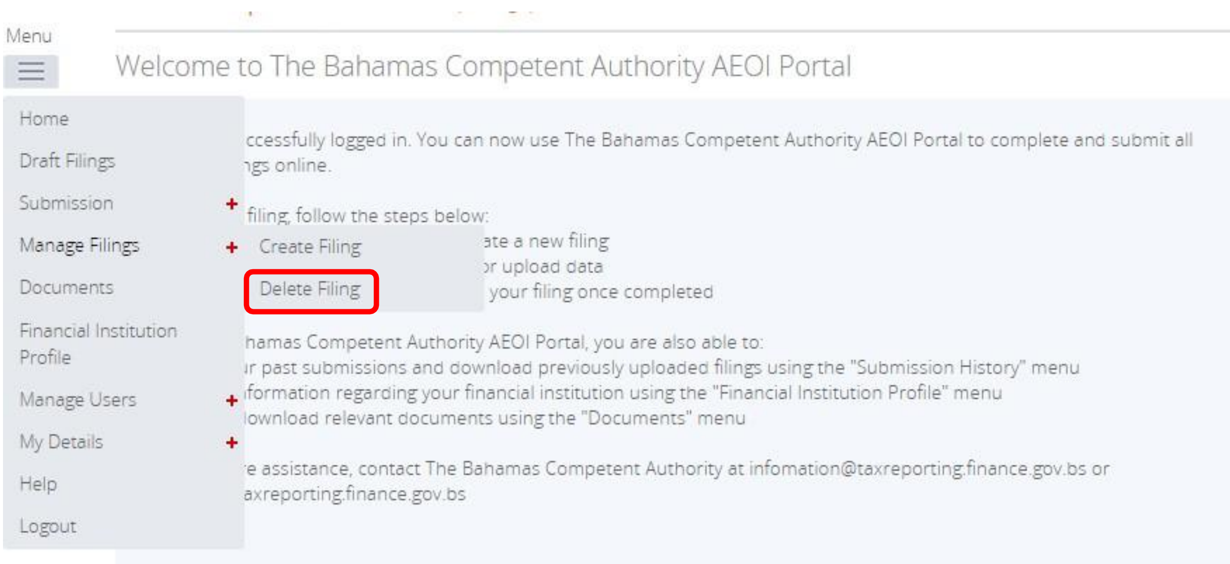
4. You will be presented with the View Filing page for the selected filing. Select the **View Upload History** icon to download XML files for XML Upload filings only.



9 Deleting draft filings

You can delete draft filings that have not been submitted, by following the below steps.

1. Navigate to the **Delete Filing** screen using the menu at the top left of the screen. Select **Manage Filings** > **Delete Filings**, as shown in the image below.

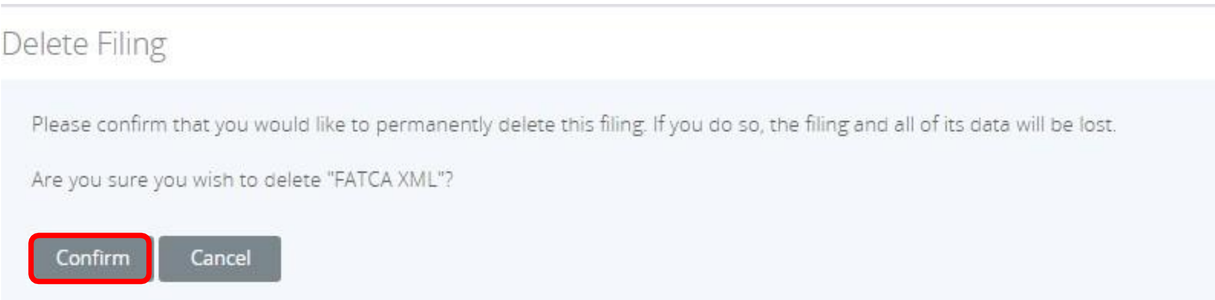


2. You will be presented with the **Delete Filing** page, as shown in the image below.

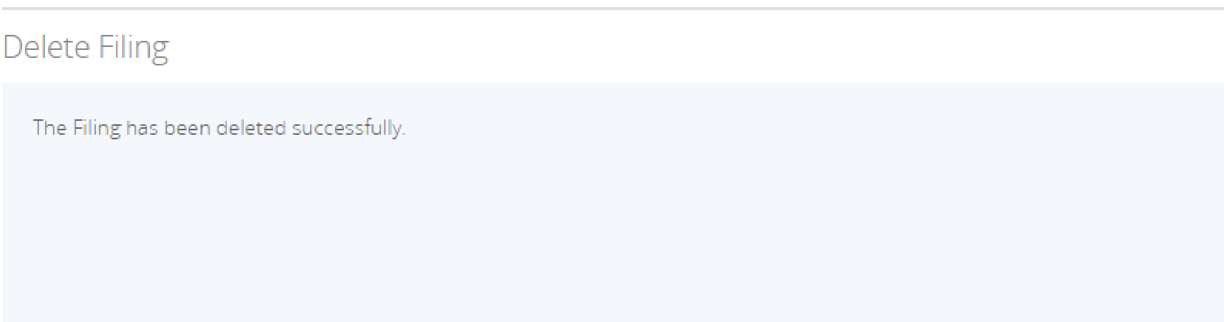
Filing name	Reference	Revision	Categories	Receiving Country	Status	Creation date	Action
Update Primary User	PU00093	0.1		n/a	Ready to Submit	20/06/2018 19:07:27	Delete
Update obligations	RO00092	0.1		n/a	Ready to Submit	20/06/2018 19:00:31	Delete
FATCA XML	FF00099	0.1	Waiting	n/a	Ready to Submit	21/06/2018 10:18:11	Delete
Error XML	CRS00098	0.1	Waiting		No Data	21/06/2018 09:56:23	Delete
Change of Address	FI00091	0.1		n/a	Ready to Submit	20/06/2018 19:00:03	Delete

3. Select the "**Delete**" button from the **Action name** column of the Delete Filings table to delete that filing.

4. You will be brought to a delete filing confirmation page, as shown below. By selecting the confirm button, the filing and all of its data will be lost. Select the **Confirm** button to permanently delete this filing.



5. You will receive a confirmation message confirming the deletion.



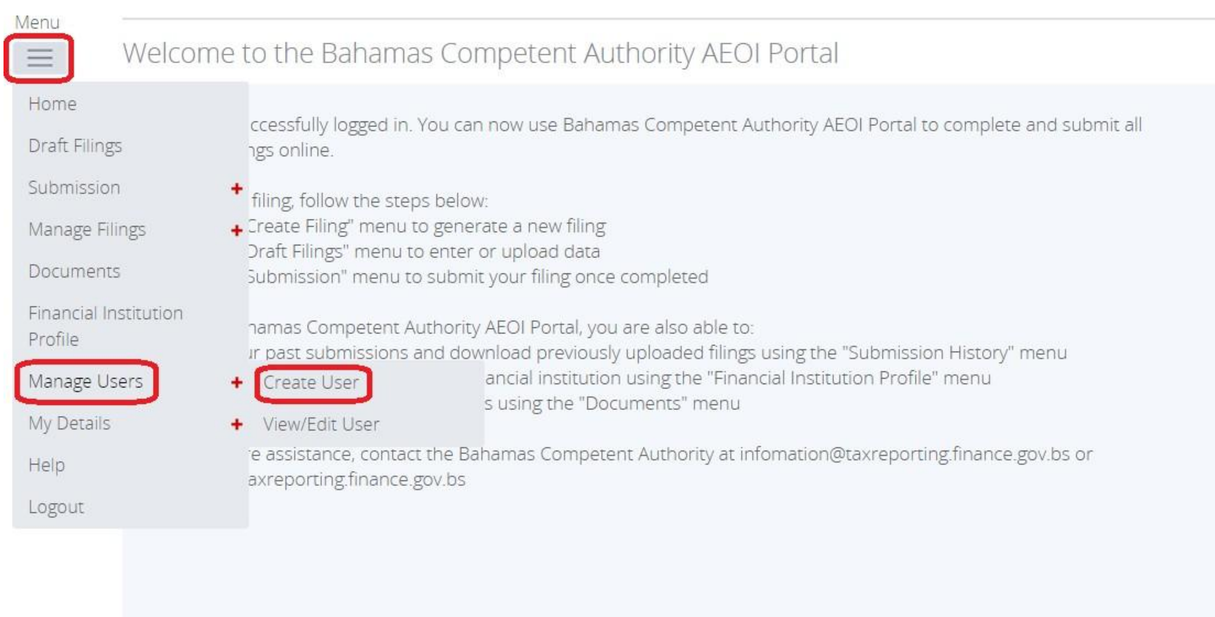
10 Managing Secondary Users

If you are the designated Primary User for your Financial Institution, you can create, update, and deactivate Secondary Users for your financial institution.

Important Note: Primary Users are expected to create 1-2 Secondary Users after they enrol, in order to support the Primary User, fill in should the Primary User be away or unavailable, or submit a Primary User Change Notice should the existing Primary User leave the organization or is otherwise unable to continue as Primary User.

10.1 Creating Secondary Users

1. Navigate to **Manage Users** > **Create User** using the menu at the top left of the screen. This menu will only be available if you are the Primary User for your Financial Institution.



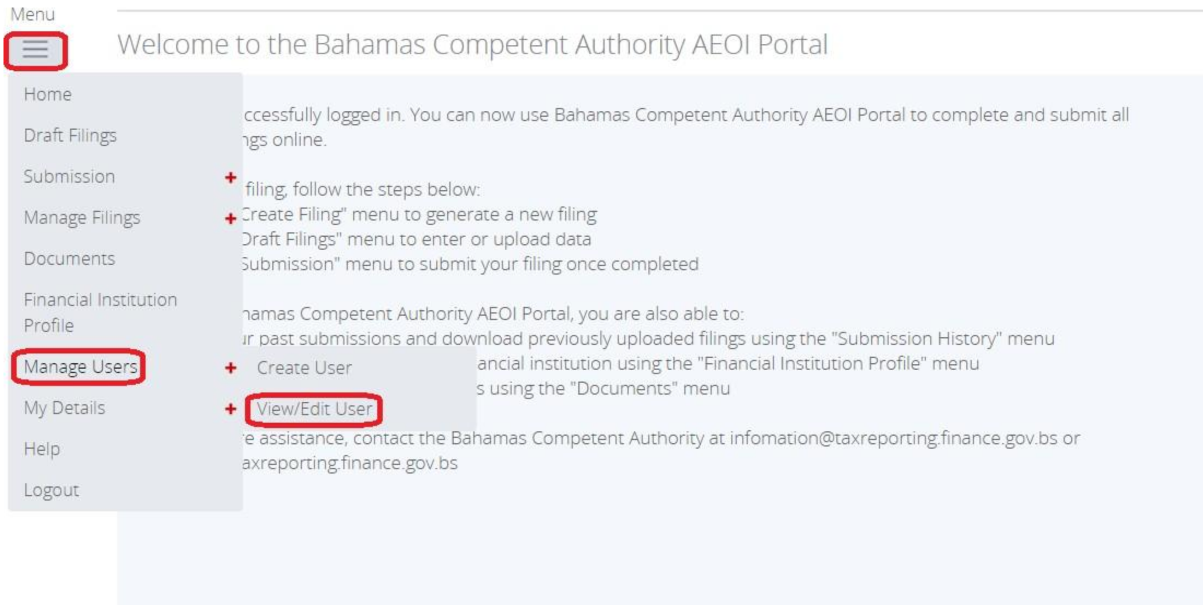
2. You will be presented with the **Create User** page. Enter the details of the new user and select the **RE - Secondary User** role. Select **Create** to complete the user creation and assignment of the user role.
   - **Important note:** Secondary Users are granted all of the same permissions as the Primary User <u>with the exception of the ability to create and manage other users</u> for your Financial Institution. That permission is granted only to the Primary User.

3. Upon creation, the new user will receive a system-generated email which includes their user name and temporary password. They will be asked to select a new password upon their first login to the system (see *Section 3 Logging in and updating your user details*).

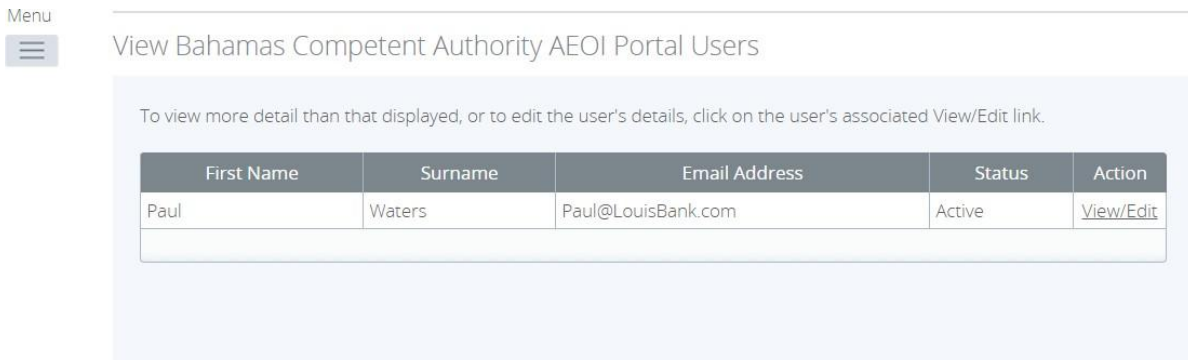
10.2 Updating or deactivating Secondary Users

As the Primary User for your Financial Institution, you can edit the details of other users for your entity, or deactivate them to remove their access to your Financial Institution's data in the system.

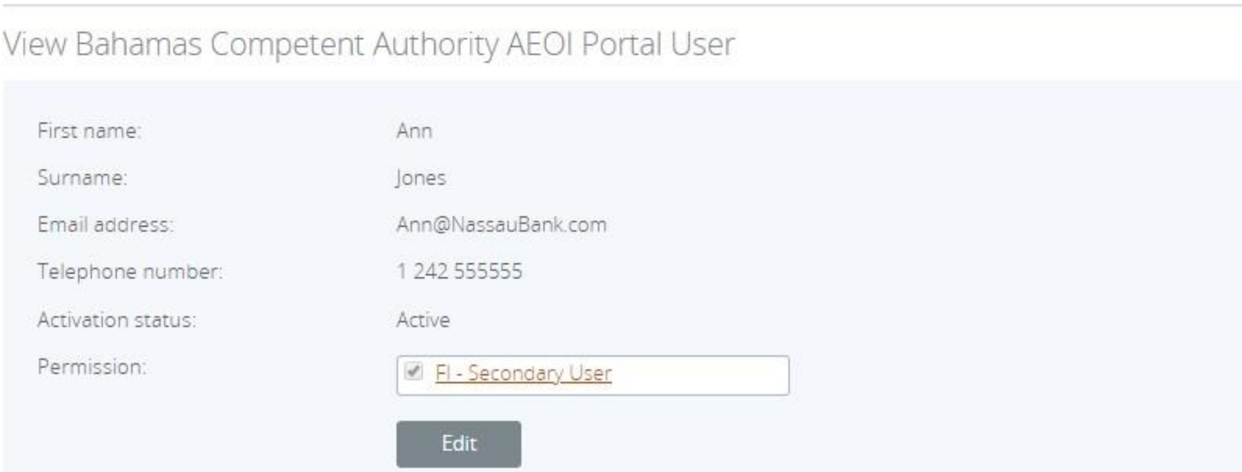
1. Navigate to **Manage Users** > **View/Edit User** using the menus at the top of the screen.



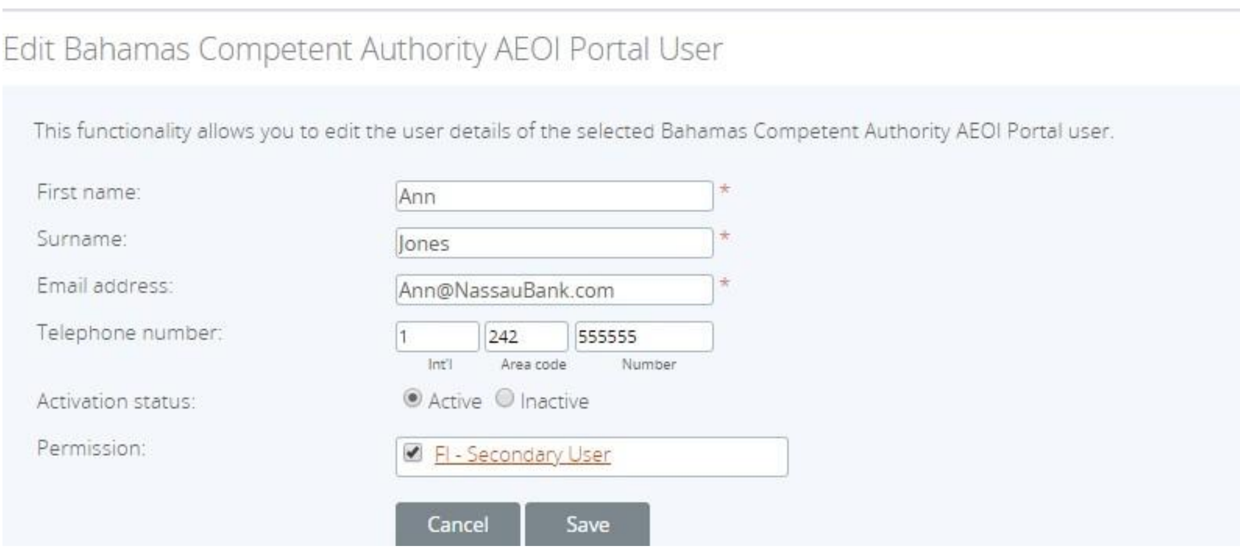
2. You will be presented with the **View Bahamas Tax Information Reporting Portal Users** page, displaying the list of Secondary Users for your financial institution. Select the **View/edit** link for the user whose details or status you would like to update.



3. You will be presented with a view-only page that includes the user's current details, status, and permissions.



4. Select the Edit button to edit the user’s name, email address, telephone number, permissions, or set their **Status** to Inactive. Select Save to apply your changes.
    - **Important note:** Changing a user’s **Email address** will change the email address that the user uses to log in to the system, and the email address to which system-generated emails are sent for that user.
    - **Important note:** Setting a user’s **Status** to Inactive will prevent that user from being able to view or edit your financial institution’s data in the system.



11 Updating a Primary User

Functionality has now been added to allow an existing Primary or Secondary User to submit a Primary User Change Notice via the portal. Details on this process are included in the sections below.

Important Note: It is advisable to ensure you always have at least one active Secondary User assigned to your entity in the system. If neither the existing Primary User nor a Secondary User is able to submit the Primary User Change Notice, this change cannot be processed via the portal. A representative of the entity will need to contact the Competent Authority, at information@taxreporting.finance.gov.bs or helpdesk@taxreporting.finance.gov.bs. Your request should include the following information:

- Existing Primary User First Name
- Existing Primary User Last Name
- Existing Primary User Email Address
- Existing Primary User Position
- New Primary User First Name
- New Primary User Last Name
- New Primary User Email Address
- New Primary User Position
- New Primary User Telephone Number
- Letter signed by a director or officer, specifying them as the new Primary User and authorizing the change

11.1 Creating a Primary User Change Notice

In order to submit a request to change the Primary user for your entity, you must first create a **Primary User** filing.

1. Navigate to the **Create Filing** screen using the menu at the top left of the screen. Select **Manage Filings > Create Filings**, as shown in the image below.

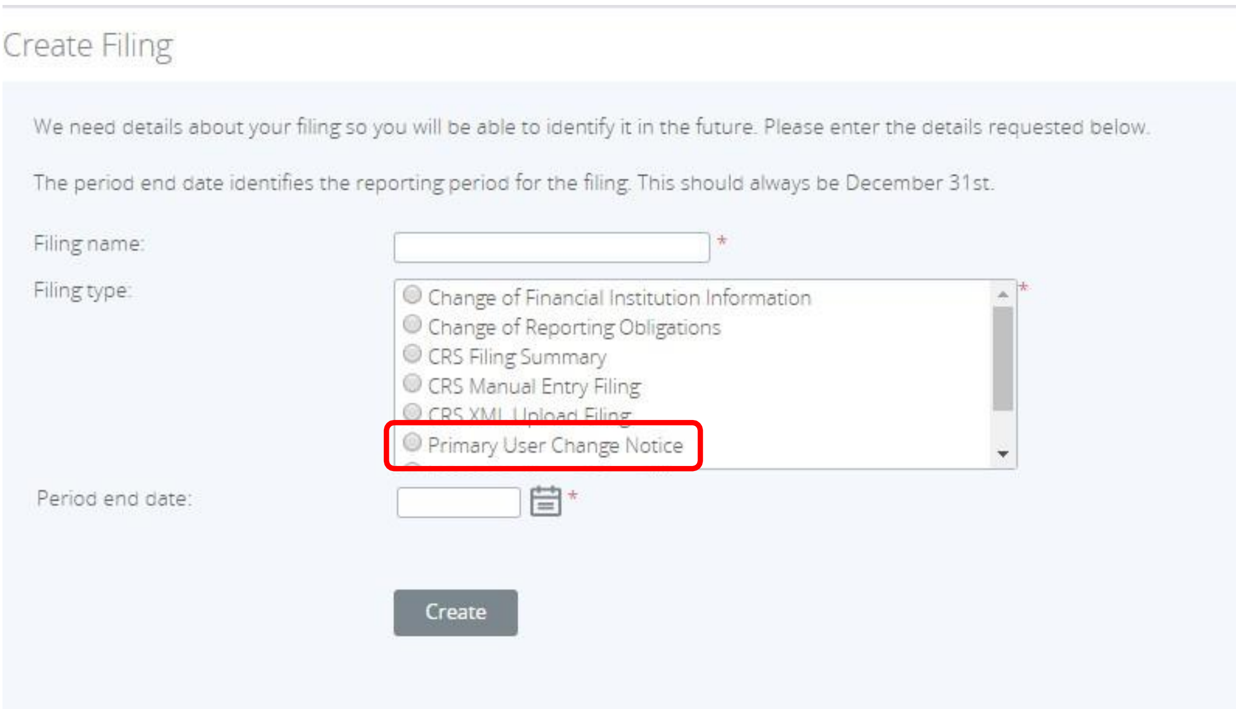
2. You will be presented with the **Create Filing** page, as shown in the image below.

3. Enter a **Filing name** that is meaningful to you. It is best practice to include the name of the new Primary User being requested so that filings can be easily differentiated.

4. Select "**Primary User Change Notice**" as the **Filing type**.

5. Select the **Period end date** for the filing. For the Change of Financial Institution Information form, this should be the <u>current date or the date in which the change was effective</u>.

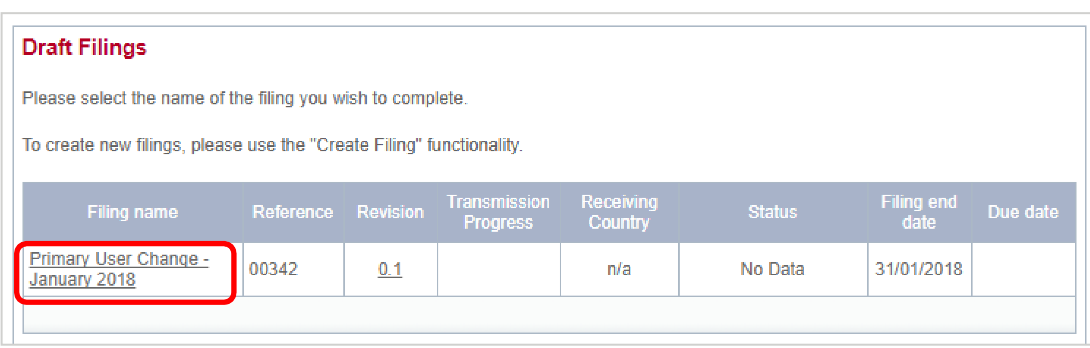
6. Select the **Create** button to complete the creation of your form and make it available to submit.



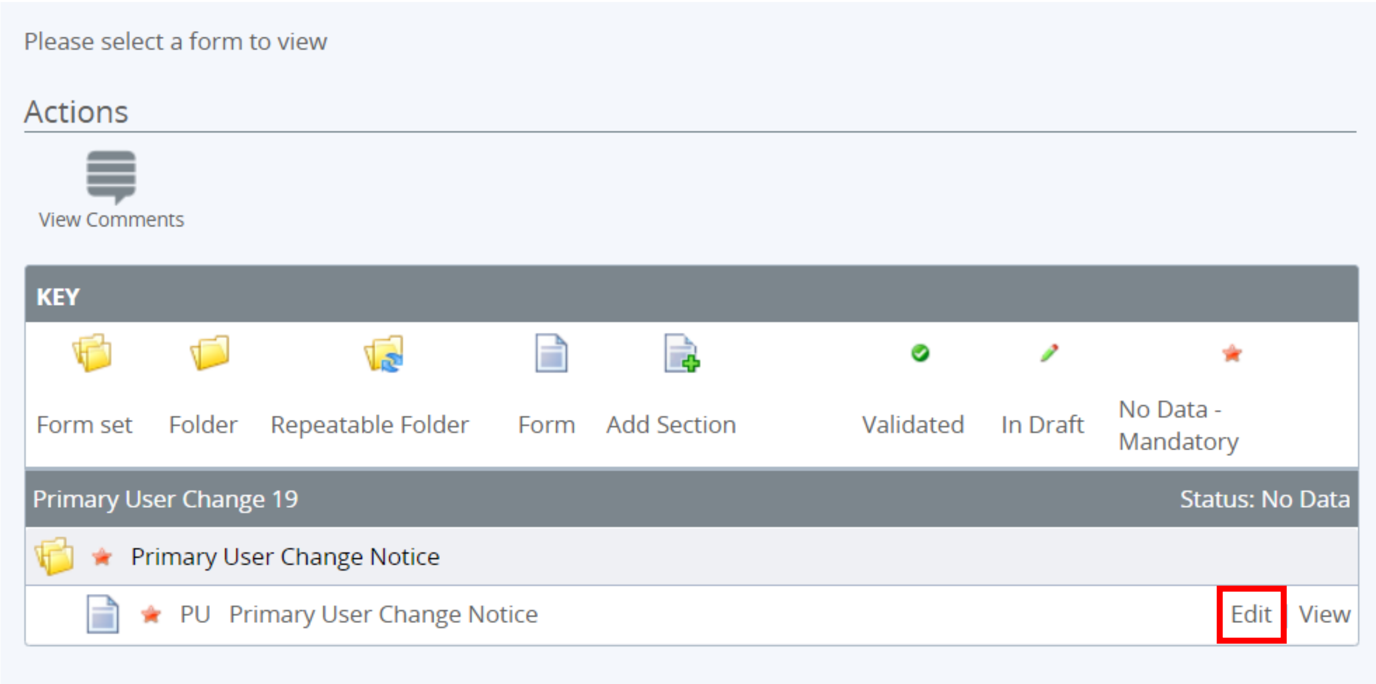
11.2 Completing and Submitting a Primary User Change Notice

1. Navigate to the **Draft Filings** screen using the menu at the top left of the screen to view filings and forms that you have created but not yet submitted.

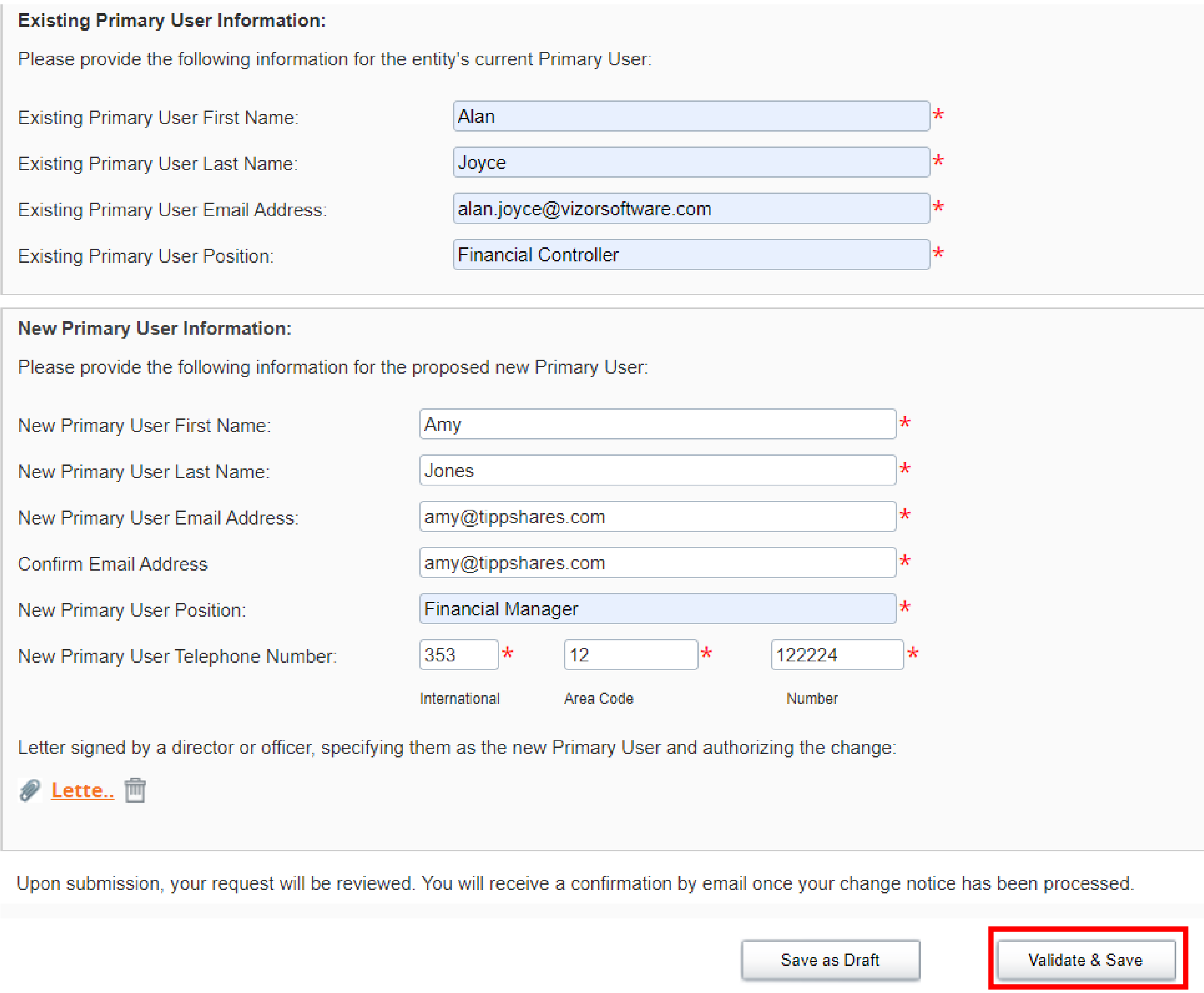
2. Select the name of the change notice you created from the **Filing name** column of the Draft Filings table to open that filing. You will be presented with the **Draft Filing** screen for the Primary User Change Notice.



3. Select the **Edit** link beside the Primary User Change Notice form to display the form.



4. Complete all mandatory fields and uploads on the form, and click "**Validate & Save**"



Existing Primary User Information:

Please provide the following information for the entity's current Primary User:

Existing Primary User First Name: Alan *

Existing Primary User Last Name: Joyce *

Existing Primary User Email Address: alan.joyce@vizorsoftware.com *

Existing Primary User Position: Financial Controller *

New Primary User Information:

Please provide the following information for the proposed new Primary User:

New Primary User First Name: Amy *

New Primary User Last Name: Jones *

New Primary User Email Address: amy@tippshares.com *

Confirm Email Address amy@tippshares.com *

New Primary User Position: Financial Manager *

New Primary User Telephone Number: 353 * 12 * 122224 *

International Area Code Number

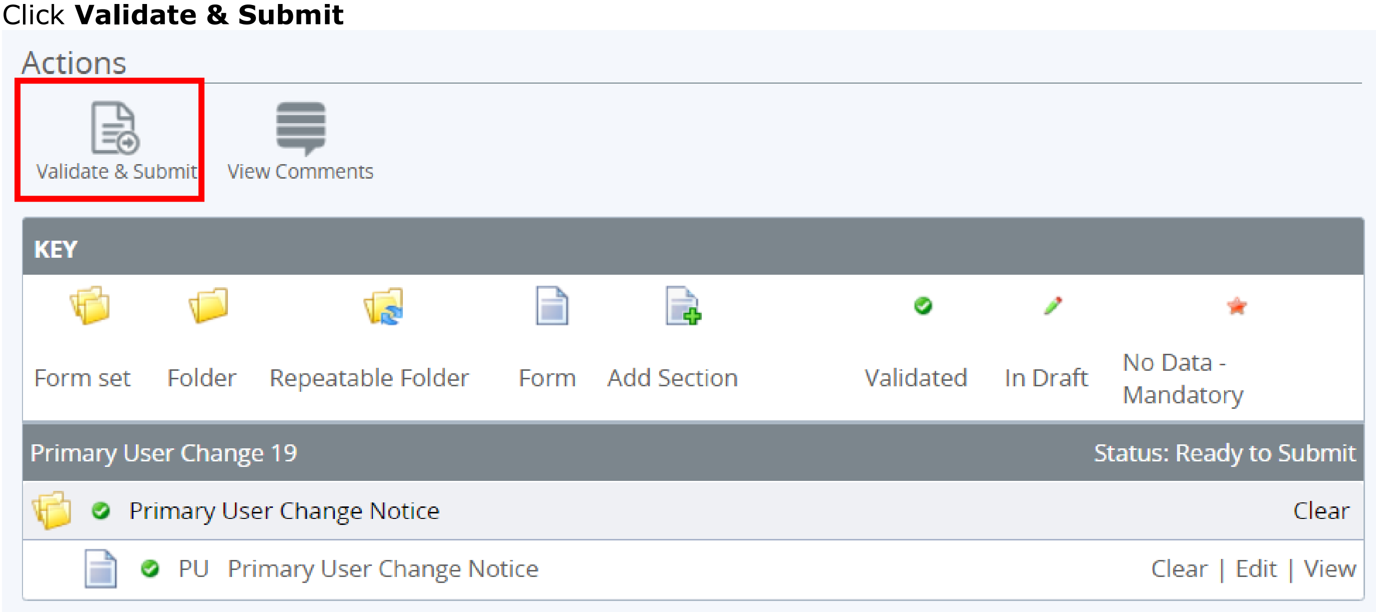
Letter signed by a director or officer, specifying them as the new Primary User and authorizing the change:

Lette..

Upon submission, your request will be reviewed. You will receive a confirmation by email once your change notice has been processed.

Save as Draft Validate & Save

Click **Validate & Submit**



Actions

Validate & Submit View Comments

KEY

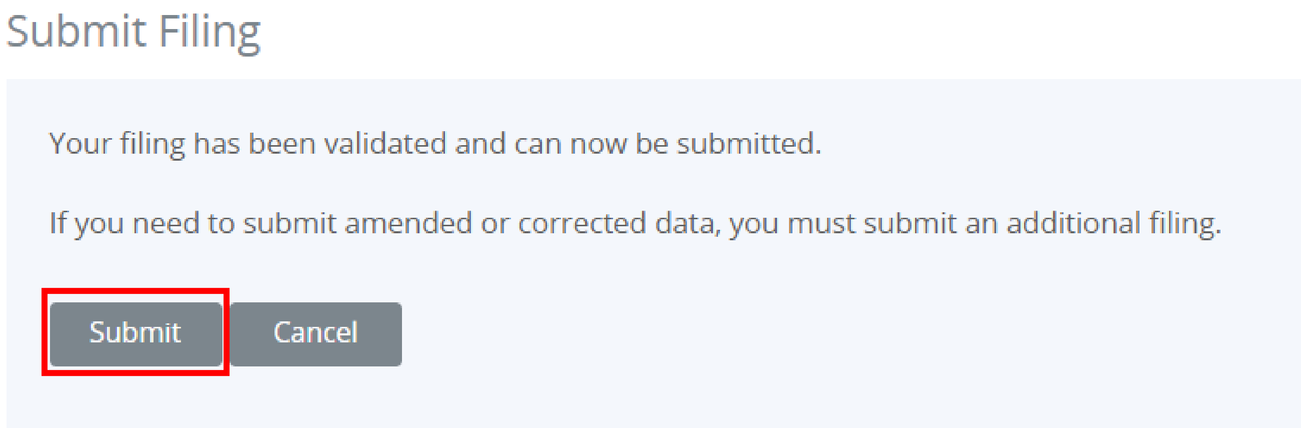
Form set Folder Repeatable Folder Form Add Section Validated In Draft No Data - Mandatory

Primary User Change 19 Status: Ready to Submit

Primary User Change Notice Clear

PU Primary User Change Notice Clear | Edit | View

5. You will be presented with the **Submit Filing** page. Select **Submit** to confirm submission. Your changes will be reflected on the **Reporting Entity Profile** tab.



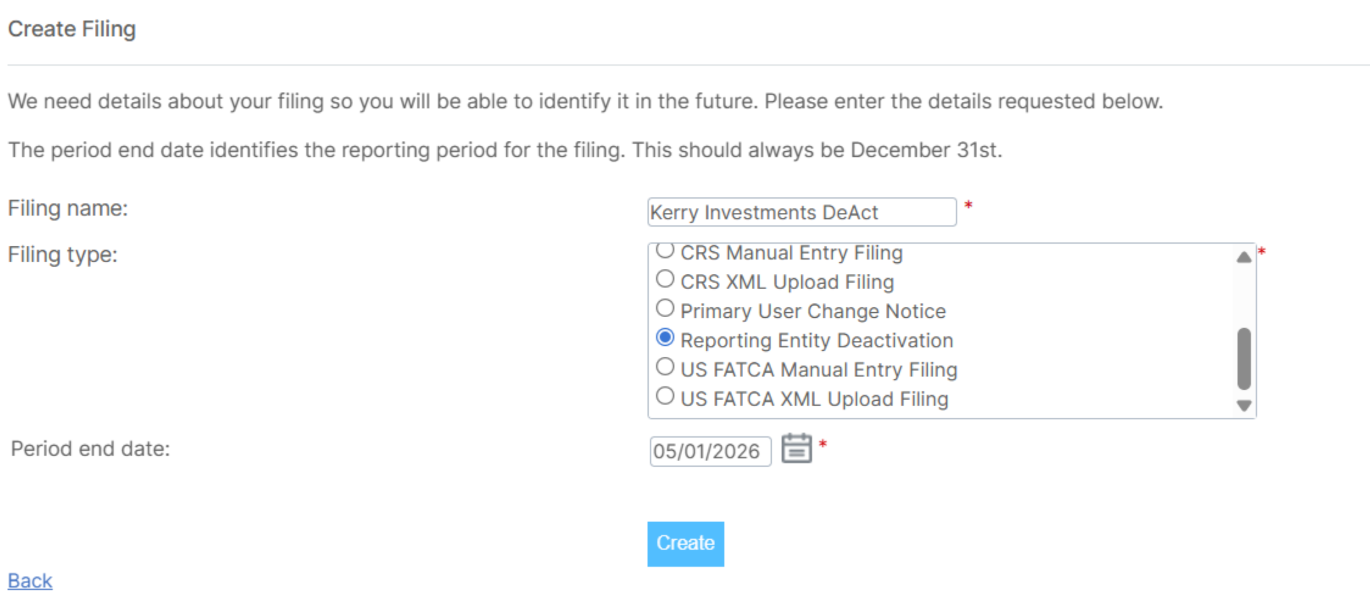
12. Reporting Entity Deactivation

This section will illustrate how a reporting entity completes a deactivation filing in Vizor Portal.

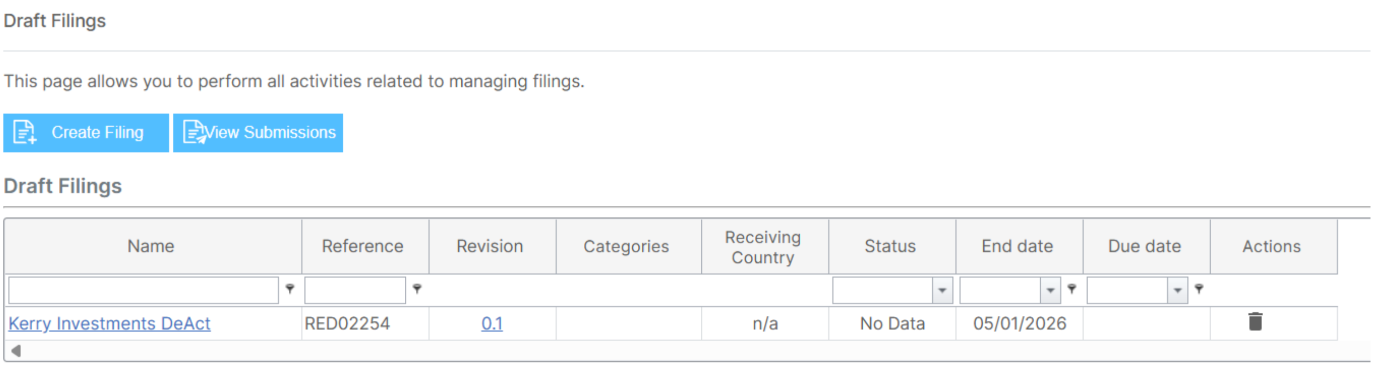
Click **Menu > Manage Filings > Create Filings**

Enter **Filing name, Filing type, Period end date.**

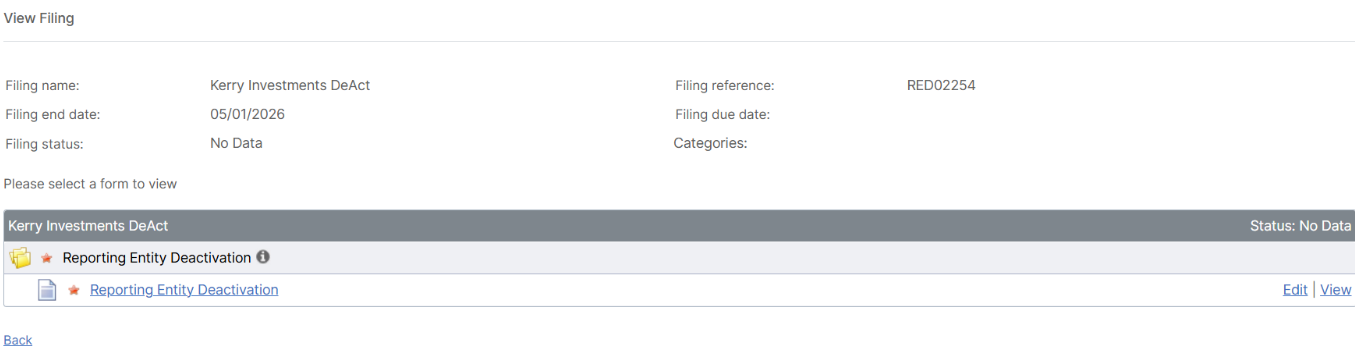
Click **Create.**



Click **Menu > Draft Filings**
Click **Filing name**



Click **Edit**

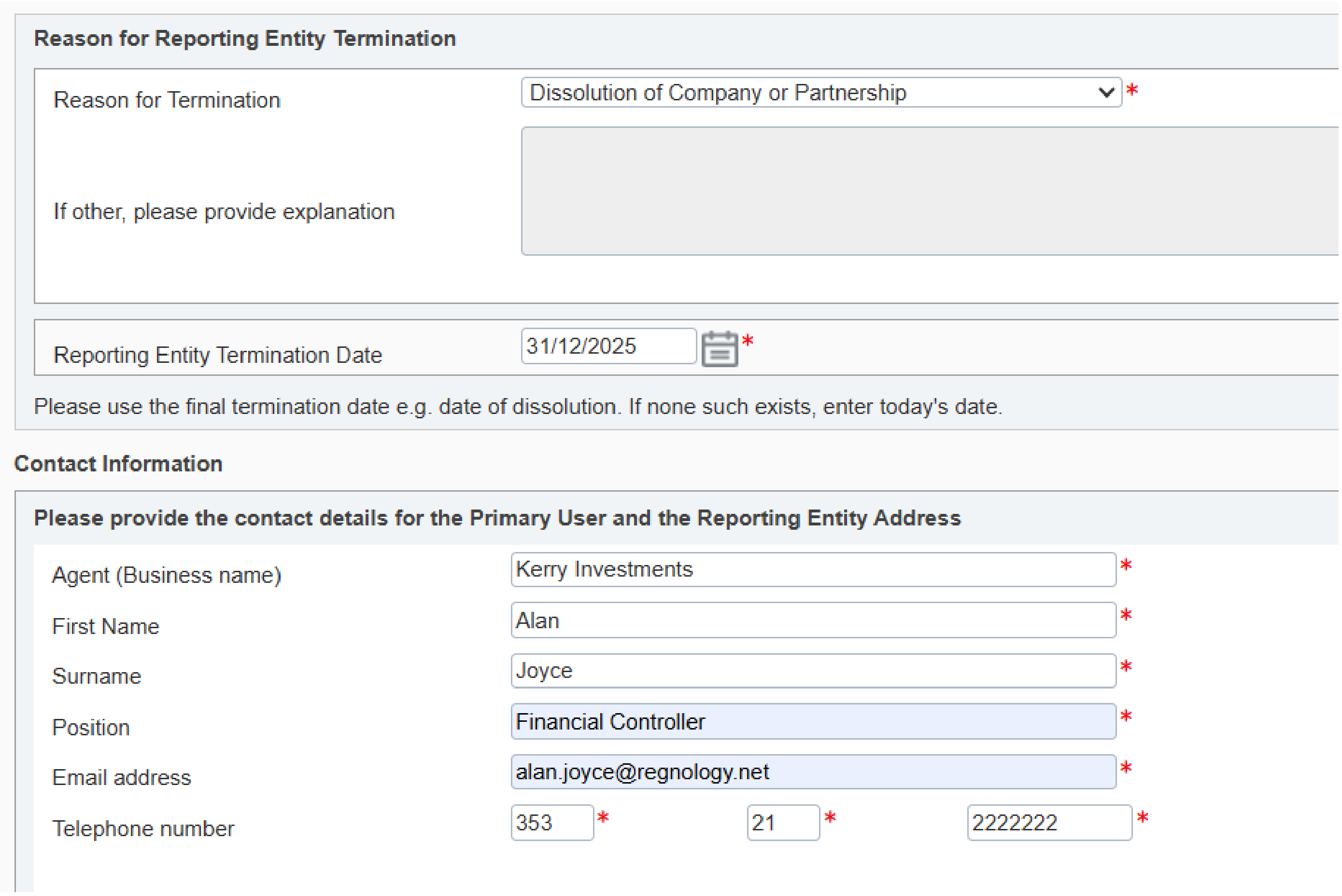


Select Dissolution of Company or Partnership for Reason for Termination.

Enter a date for Reporting Entity Termination Date.

The reporting entity must enter the following details:

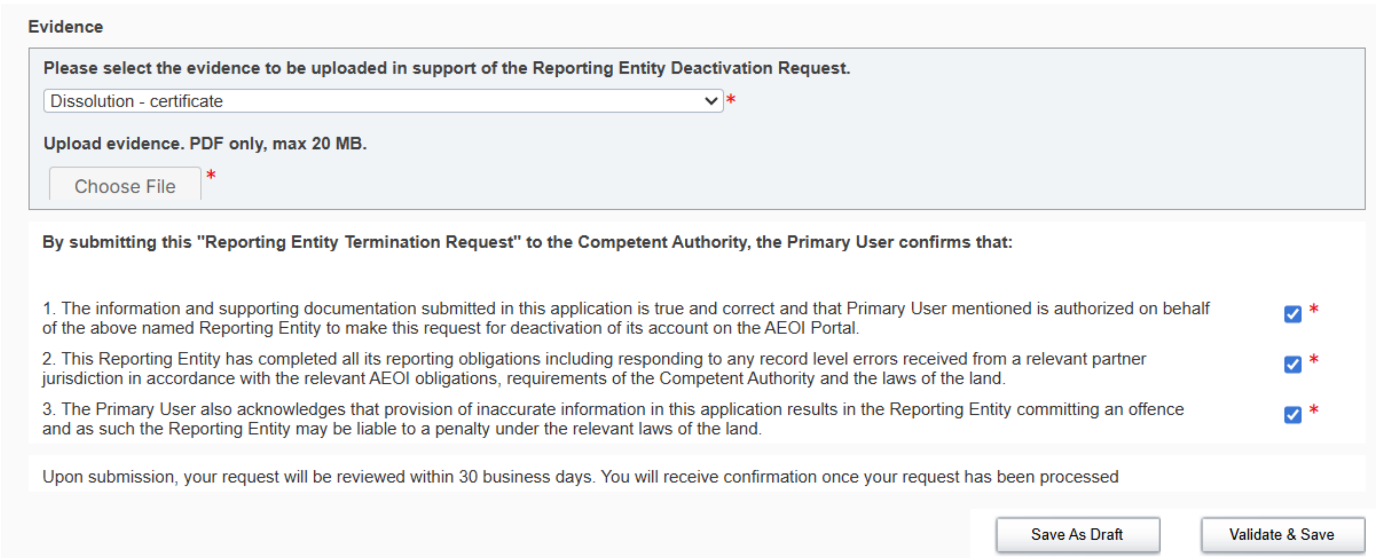
Agent Business Name
Primary User First Name
Surname
Email Address
Confirm Email Address
Telephone Number



Enter the following details:

Number Street
City or Town
State / Province / Region
Country
Post Code

Select Dissolution – certificate in drop-down menu
Upload evidence attachment
Tick the **3 check-boxes** and click **Validate & Save**



The relevant Tax Authority must approve the reporting entity deactivation.

13. Bahamas Competent Authority CBC User Guide

Completing an Enrolment

All Financial Institutions are required to complete an Enrolment form before accessing the system.

This form is publicly accessible and the URL will vary slightly depending on where your enrolment functionality is hosted.

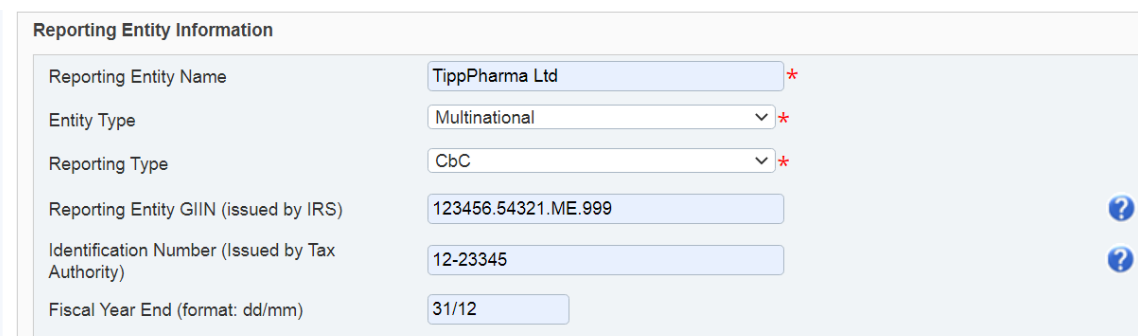
Links to the enrolment page and portal will be accessible via the Bahamas Competent Authority website at https://www.taxreporting.finance.gov.bs/wp-content/uploads/2015/06/Bahamas-Competent-Authority-AEOI-Portal-User-Guide-v1.0N.pdf (see page 4).

Before completing the Enrolment Form, a person must first prove that they are indeed a real person by entering a series of letters and digits displayed to them.

Having successfully entered the letters and digits, the person is brought to the enrolment form. The FI must complete all mandatory fields on the enrolment form, which includes two sections:

1. Financial Institution Information
2. Primary User Information

All Financial Institutions will have already obtained a GIIN (Global Intermediary Identification Number) which is issued by the IRS (for FATCA). In reporting type select CBC. **Note: The GIIN is not a mandatory field for CbC reporting if the FI is not registered for FATCA.**


Reporting Entity Information

Reporting Entity Name	TippPharma Ltd *
Entity Type	Multinational *
Reporting Type	CbC *
Reporting Entity GIIN (issued by IRS)	123456.54321.ME.999
Identification Number (Issued by Tax Authority)	12-23345
Fiscal Year End (format: dd/mm)	31/12

Enrolment Requirements Include:

All fields with red asterixis are mandatory.

Primary User Information

- First name

- Surname
- Email Address
- Telephone number
- Letter from Director of FI

Enrolment requirements include:

Submission completed through the “Submit button”

Enrolment requirements include submission completed through the “Submit button”.

One the enrolment has been submitted, a confirmation message will be displayed.

Note: The title of the return link will vary according to your specific implementation.

An Email confirmation should be sent to the primary user’s email address containing the login address, the username and a temporary password which needs to be changed on the first login.

The following rules are enforced for the password:

- It must contain one capital letter, one small letter, one number and one special character
- It must be at least eight characters and no more than 30 characters
- It must not contain any spaces
- You cannot reuse your existing password

A. CBC Enrolment

After an initial enrolment is approved by the Competent Authority for CbC, each reporting entity **must** complete an Article 3 Notification filing before completing a CbC filing. Upon receipt of the email with log in credentials for portal, proceed to portal log in page.

Create Article 3 Notification Filing:

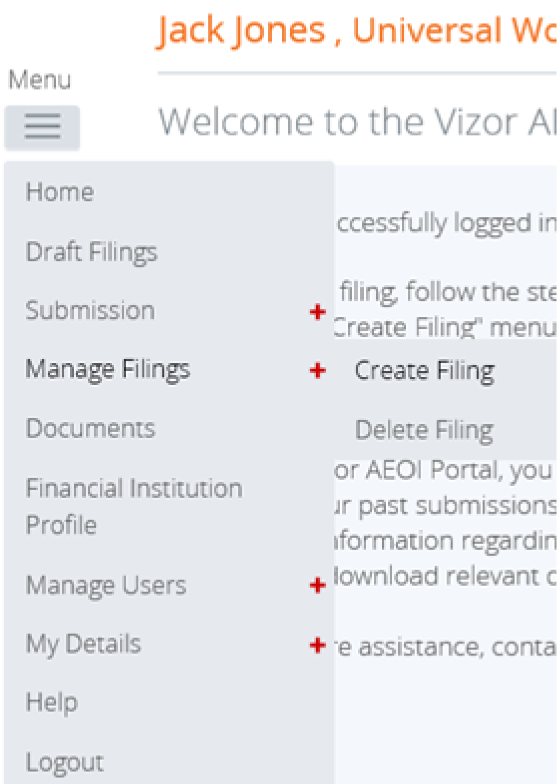
Click **Menu > Manage Filings > Create CBC Filing**

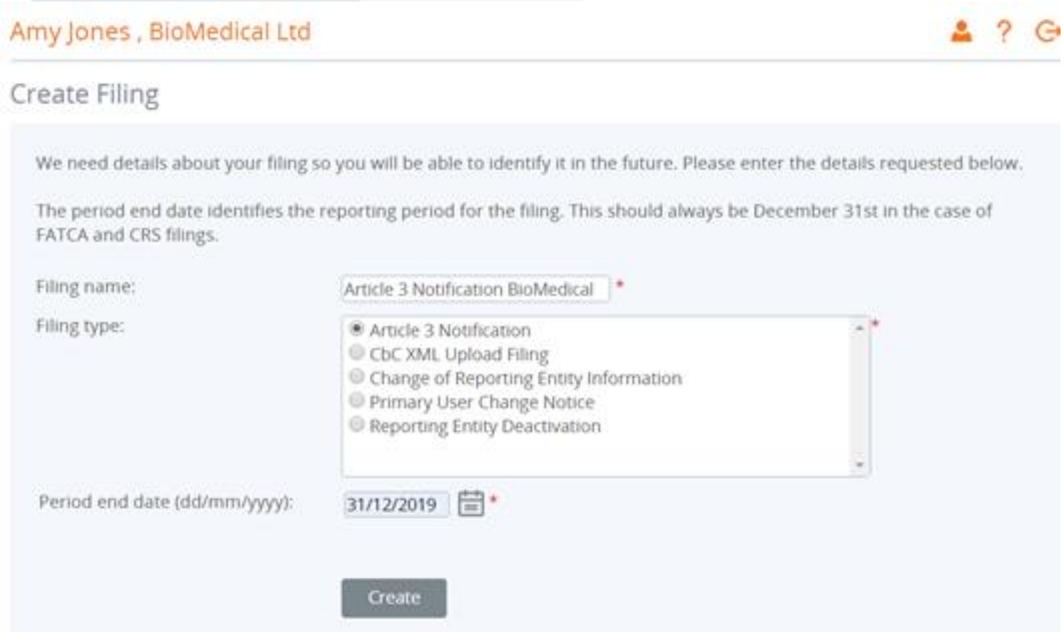
Enter a Filing name, Filing type and Period end date.

Note: The period end date is the last day of the reporting period. For CbC Reporting. This must be the last day of the Reporting Fiscal Year and the year must be equal to the year being reported for.

Click **Create**.

To create an Article 3 Notification, first go to the Menu Button on the left hand side (all CBC filings **must** be in XML format).
Then go to Manage Filings and Create Filing.

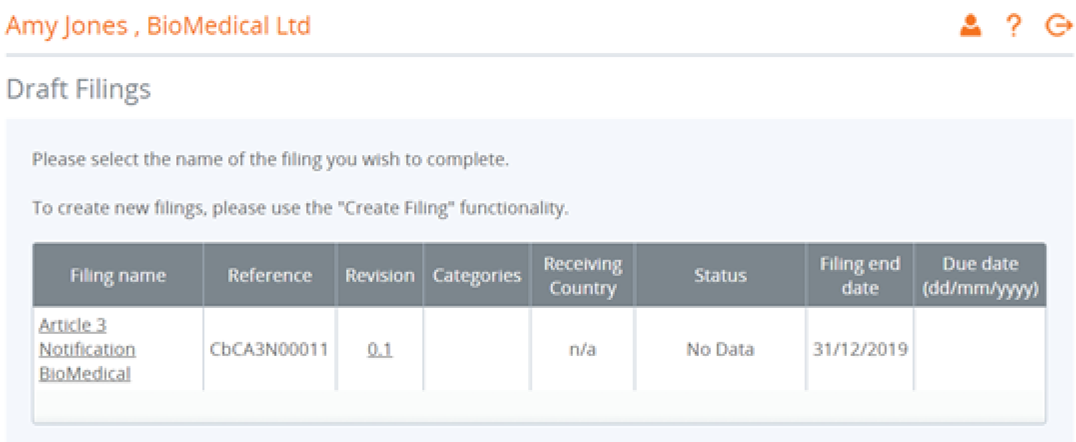




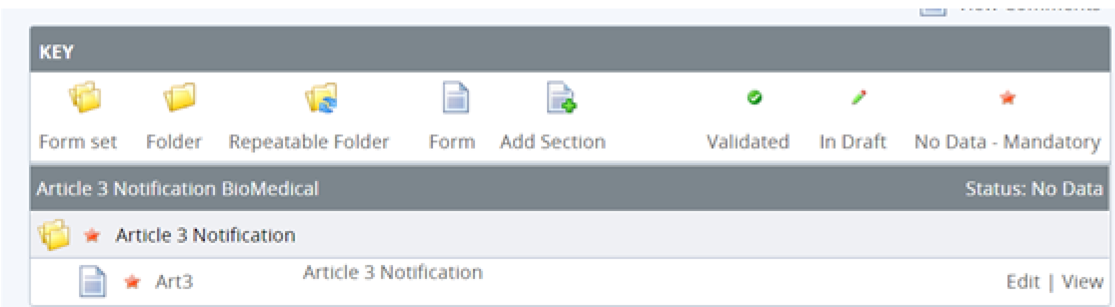
Each Filing must have Filing Name, Filing Type and Period End Date. Click Create Button.

Click **Menu > Draft Filings**

Select **Filing name**



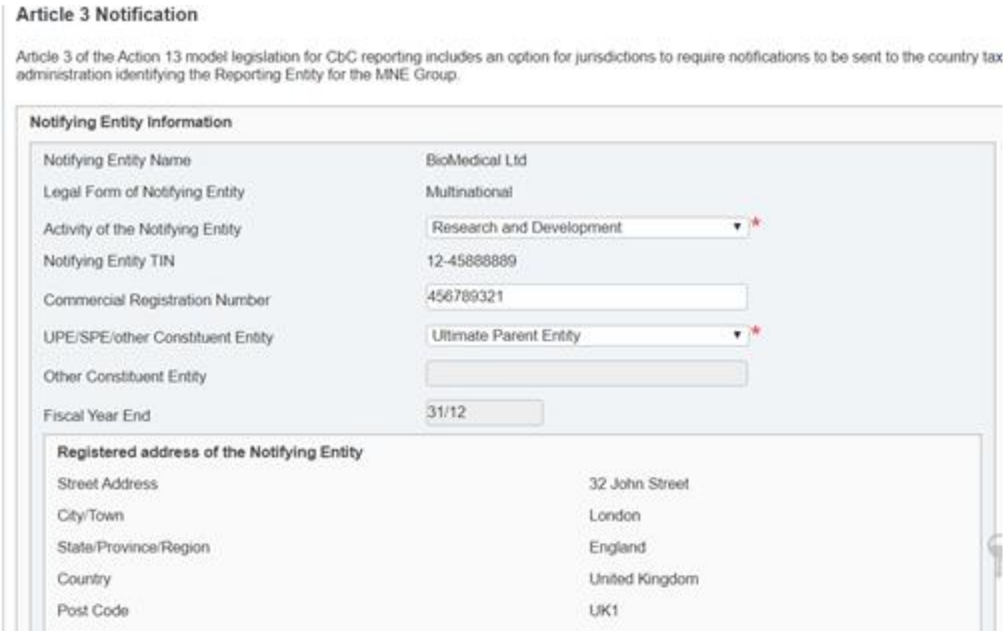
Click Edit



Some of this form will be pre-populated with information from the initial enrolment.

The reporting entity needs to provide the following information:

- Activity of the Notifying Entity
- Commercial Registration Number
- UPE/SPE other Constituent Entity
- MNE Group Name
- MNE Group Additional Information
- Description of CbC filing & Notification Type



Article 3 Notification

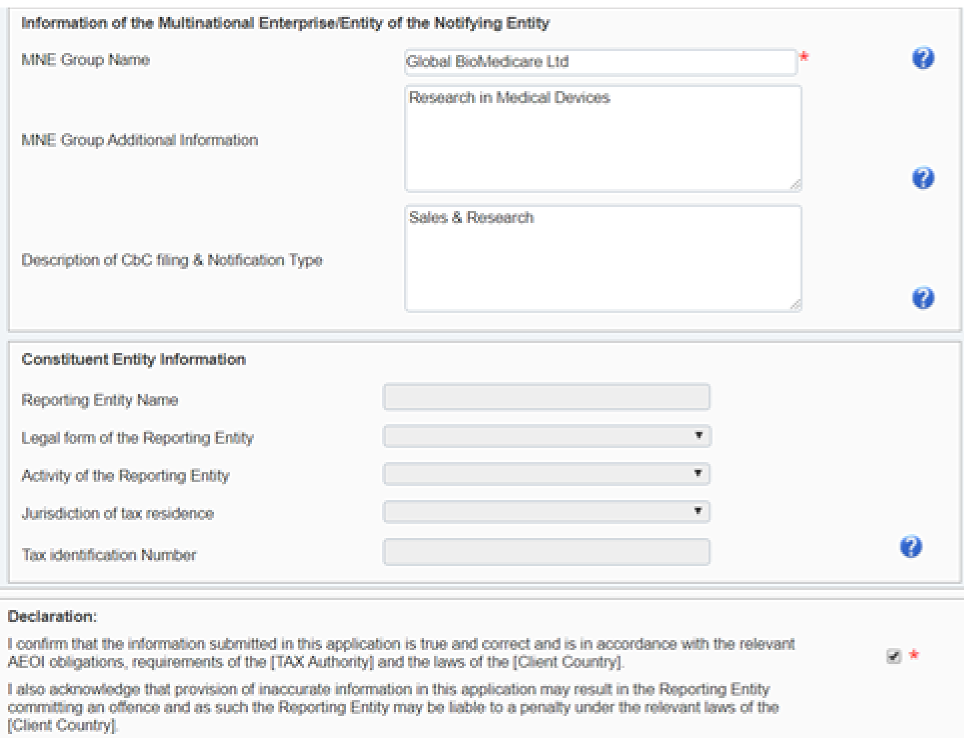
Article 3 of the Action 13 model legislation for CbC reporting includes an option for jurisdictions to require notifications to be sent to the country tax administration identifying the Reporting Entity for the MNE Group.

Notifying Entity Information

Notifying Entity Name	BioMedical Ltd
Legal Form of Notifying Entity	Multinational
Activity of the Notifying Entity	Research and Development *
Notifying Entity TIN	12-45888889
Commercial Registration Number	456789321
UPE/SPE/other Constituent Entity	Ultimate Parent Entity *
Other Constituent Entity	
Fiscal Year End	31/12

Registered address of the Notifying Entity

Street Address	32 John Street
City/Town	London
State/Province/Region	England
Country	United Kingdom
Post Code	UK1



Information of the Multinational Enterprise/Entity of the Notifying Entity

MNE Group Name	Global BioMedicare Ltd *
MNE Group Additional Information	Research in Medical Devices
Description of CbC filing & Notification Type	Sales & Research

Constituent Entity Information

Reporting Entity Name

Legal form of the Reporting Entity

Activity of the Reporting Entity

Jurisdiction of tax residence

Tax identification Number

Declaration:

I confirm that the information submitted in this application is true and correct and is in accordance with the relevant AEOI obligations, requirements of the [TAX Authority] and the laws of the [Client Country]. *

I also acknowledge that provision of inaccurate information in this application may result in the Reporting Entity committing an offence and as such the Reporting Entity may be liable to a penalty under the relevant laws of the [Client Country].

Click **Check Box for Declaration**

Click **Validate & Save**

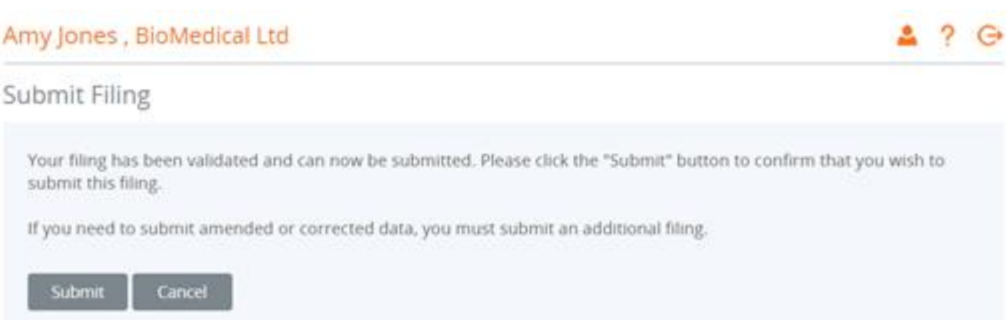
To **Submit filing** to **Competent Authority.**

Click Menu > Submission > Submit Filing

Click **Validate**

5

Click Submit



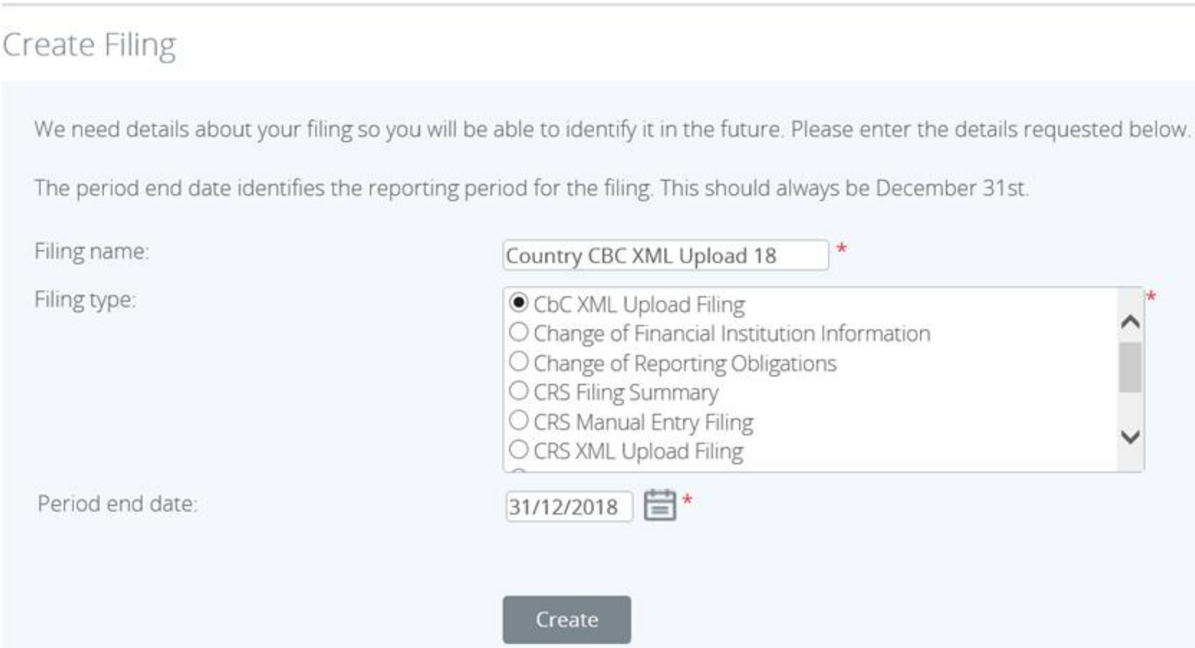
Submitting CBCR Filing

The first step in creating a CbC filing is to select **Manage Filings** > **Create Filing** from the main menu within Vizor Portal

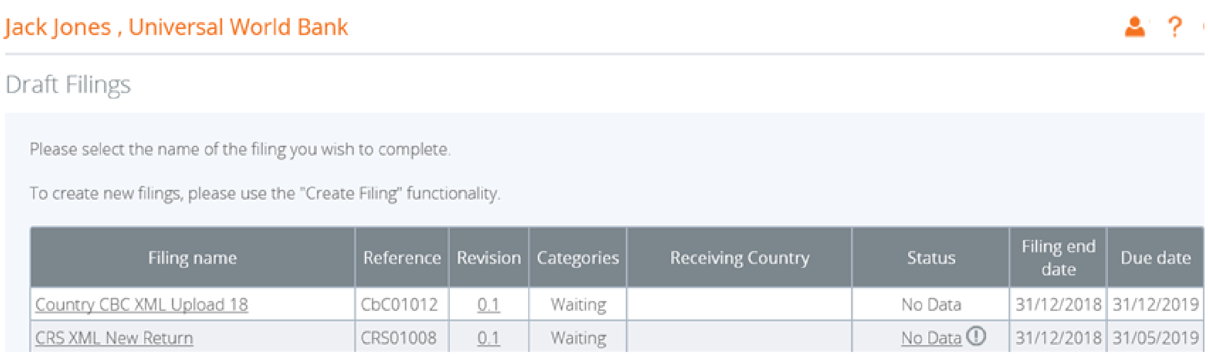
Enter a name for the filing (which should be meaningful name in Production in order to easily retrieve CbCR filings at a later date).

CbC XML Upload Filing as the filing type should then be selected and a period end date should then be selected.

Note: The period end date is the last day of the reporting period. For CbC Reporting. This must be the last day of the Reporting Fiscal Year and the year must be equal to the year being reported for.



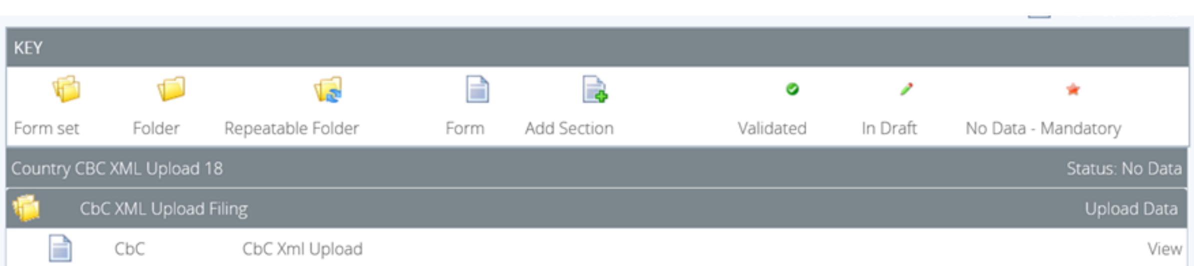
As per other filing types, once the CbCR filing has been created, it should be available within the Draft Filings section. Simply click the name of the filing to access it.



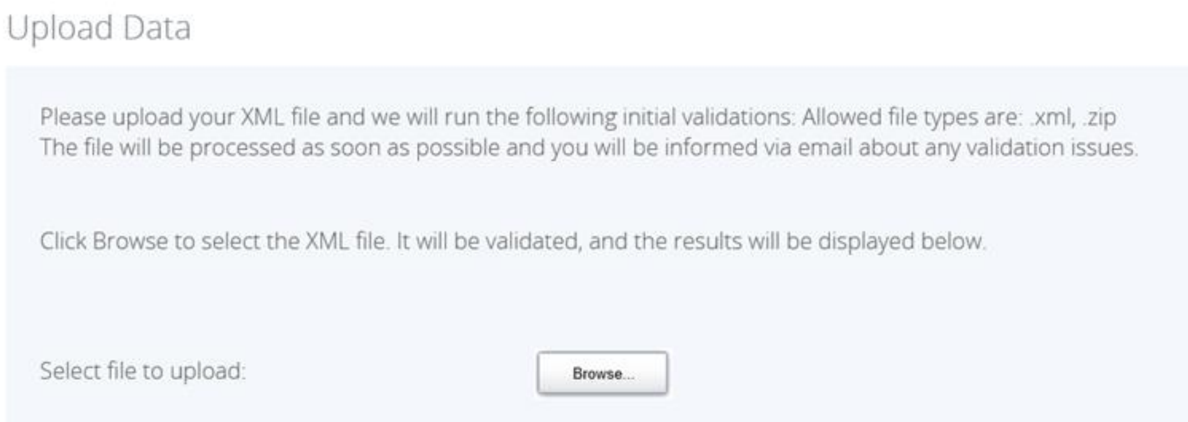
Filing name	Reference	Revision	Categories	Receiving Country	Status	Filing end date	Due date
Country CBC XML Upload 18	CbC01012	0.1	Waiting		No Data	31/12/2018	31/12/2019
CRS XML New Return	CRS01008	0.1	Waiting		No Data	31/12/2018	31/05/2019

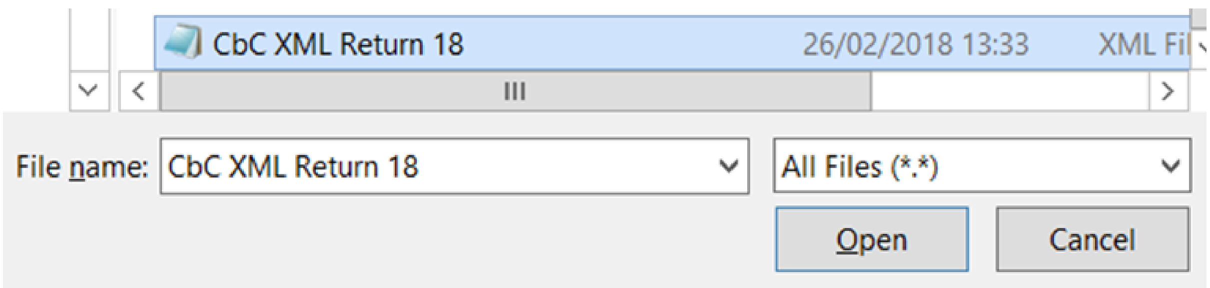
It is not possible to edit any part of the filing manually. Data must be supplied in an XML data file compliant with the CbC XML schema v.1.0 specification as published by the OECD.

Click the Upload Data button on the right hand side.



You now need to browse for your XML file.

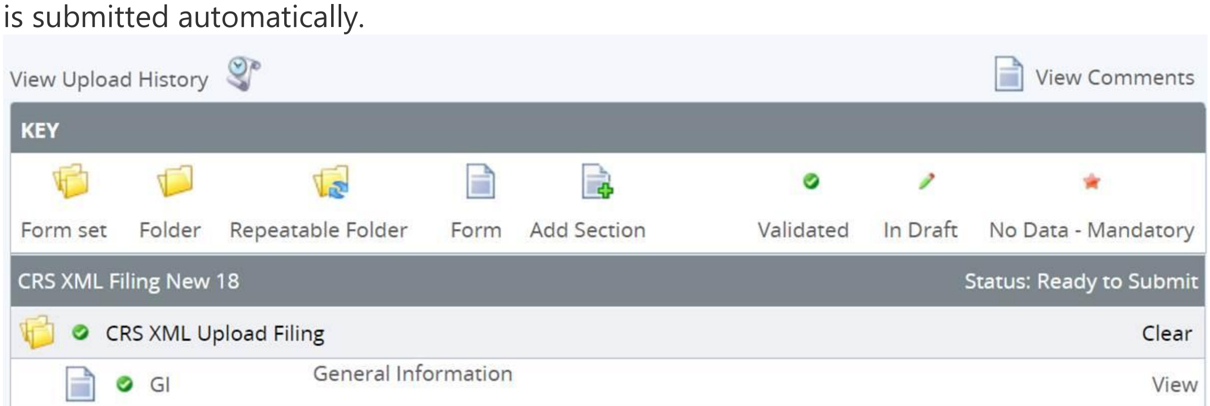




The system will begin validation of your file immediately against the OECD CbC XML schema and business rules.

If the filer has uploaded a file that is not an XML file, he/she will see an error message on the Upload Data page informing you of that error. If the filer does not receive any error message on the Upload XML page, the file will be submitted for processing and additional validation will be applied.

The filer should then receive a system-generated email when the processing is complete, indicating either the submission was successful, or that the submission was unsuccessful and that the file must be updated and resubmitted. If the submission was unsuccessful, the filer will need to fix the errors in the XML file outside of the portal. Then, log back into the portal and click on the respective filing in Draft Filings. Click Clear and upload the repaired XML file. If all validation rules are passed then the file is submitted automatically.



To Complete the XML Filing (review)

Click on the Filing Name to Complete. (Select the file to upload-Browse button)

After selecting a Filing, select Upload Data to automatically populate the filing from an XML file by clicking on Upload Data on the right hand side.
You will now browse for the XML file you wish to upload.
Select the file and click on Open.

Once the selected file uploads, the system automatically virus scans the file and rejects it if a virus is found. If no virus is found, the file is stored for offline processing. The FI user is informed that they will be notified in due course of the outcome of their submission. At this point, the FI user has completed the process and can logout.

As XML files can be very large and contain large quantities of data, their processing is handled offline so as not to impact system performance. The XML file is placed in a “queue” for processing, from where a background server picks up the XML file and performs the following processing steps:

XML Validation

The XML file is first fully validated against the relevant XSD (XML Schema Definition) file that is published by the OECD for CbC. If any XML errors are found, the processing stops, and the errors are recorded. A notification email will automatically be sent to the FI notifying them of the failed submission.

Data Extraction & Further Validation
If the XML file passes the XML validation, the system extracts the data from the XML file and enters the data into the Vizor CRS or CbC data model. At this point additional validation rules are executed:

- For CbC filings, the only additional validation on top of the XSD validation will be to ensure the reference ID is unique

If any validation errors are discovered, the errors are recorded and the processing stops. A notification email will automatically be sent to the FI notifying them of the failed submission.

Automatic Submission
If the two sets of validation performed above result in no errors with the XML data, then the filing is automatically submitted. In this scenario, the FI user is notified by email that their filing has passed all validation rules and has been accepted by the system. The successfully submitted filing moves from the “Draft Filings” area of the system to the “Submission History”(select submission history from the menu in the portal).

Validation Failures
If any validation rules fail in either of the two processing steps above, then the FI user is notified by email that there are validation failures. For security purposes, the nature of the validation errors are not contained within the email. The FI user must now log into the Portal application to view the detail

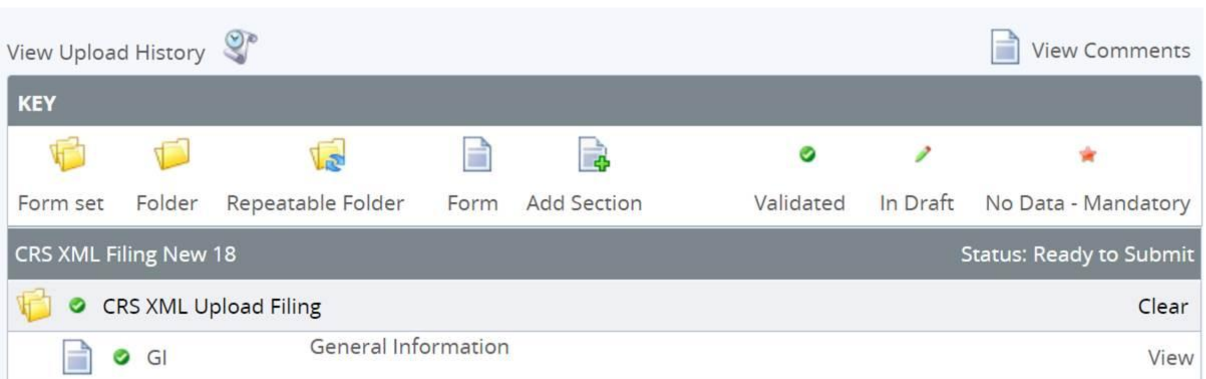
of the validation failures. These errors are accessible to the FI user by clicking on the errors icon next to the filing in the "Draft Filings" screen.

Note: Click the exclamation mark right of the Ready to Submit. This will bring you to a page explaining the error.

CRS XMl Filing 18	CRS00002	0.1	Waiting		No Data	31/12/2019	30/05/2020
CRS XML Filing New 18	CRS00005	0.1	Waiting	United Kingdom	Ready to Submit !	31/12/2018	31/05/2019

Rule name	Type	Problem	Additional information
Reporting FI Tax Residence Check	Error	1. The Tax Residence of the Reporting FI must always match the Transmitting Country. The affected Reporting FI is named Barclays bank. The affected Reporting FI section has a DocRefID of IE-ec75ab7c-09e4-55554399-9c95-f1sTsdT44dddd4TT816105db30101981	Please ensure the Tax Residency value of the Reporting FI matches the Transmitting Country value.

The filer will need to fix the errors in the XML file outside of the portal. Log back into the portal and click on the respective filing in Draft Filings. Click Clear and upload the repaired XML file.



If all validation rules are passed then the file is submitted automatically.