

Oracle Financial Services
FATCA Management
Assessment Guide

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About this Guide

This guide provides information related to Foreign Account Tax Compliance Act (FATCA) assessments being performed on an Account or Customer to adhere to the norms of FATCA regulation from the United States Internal Revenue Service (IRS). It also covers the parameters considered for creating cases on those assessments. Cases allow institutions to do further due diligence and manually update the FATCA status of an Account or Customer.

This chapter discusses the following topics:

- Who Should Use this Guide
- How this Guide is Organized
- Where to Find More Information
- Conventions Used in this Guide

Who Should Use this Guide

The FATCA Assessment Guide is designed for a variety of OFSFATCA Management users. Their roles and responsibilities, as they operate within the OFSFATCA application, include the following:

- **FATCA Analyst:** This user analyzes and disposes the assessments which have been promoted to a case. This user should understand how assessments are done, FATCA statuses are assigned and assessments are manually promoted to a case. A FATCA Analyst guides the Administrator to fine tune the parameters required for assessments.
- **FATCA Supervisor:** This user monitors and verifies actions taken on FATCA cases. This user is responsible for any update to the FATCA status in Enterprise Case Management.
- **FATCA Administrator:** This user is a manager for data center activities and application administration activities in a financial institution. This user has access to configuration functionalities, and is responsible for configuring the required details for FATCA processes to execute. This user should have in-depth knowledge of all parameters and rules used in FATCA Assessment. In addition, this user is informed on the necessary administration and maintenance functionalities.
- **FATCA Auditor:** This user monitors the FATCA assessments and cases. This user has read only access on FATCA assessments and cases.

How this Guide is Organized

The *Oracle Financial Services FATCA Assessment Guide* includes the following topics:

- Chapter 1, *About FATCA*, provides information on FATCA regulation and describes the process flow of the OFSFATCA application.
- Chapter 2, *FATCA Assessments*, describes the rules for FATCA Assessment.
- Chapter 3, *FATCA Assessments Frequency*, explains how clients should configure rules and the how the accounts and customers are accessed based on the configuration.

- Appendix A, *FATCA Assessment Rules*, provides a complete set of rules used in FATCA Assessment.
- Appendix B, *Change Log Parameters*, provides the fields based on which an account or customer is reassessed.
- Appendix C, *FATCA Status Classification*, provides FATCA classification details
- Appendix D, *FATCA Acronyms*, details acronyms used in FATCA Management

Where to Find More Information

For more information about OFSFATCA, refer to the following documents:

- **Enterprise Case Management User Guide:** shows business users the FATCA Management Assessment user interface, how to search and view FATCA Assessments, Manual Promote to Case functionality, Enterprise Case Management user interface, and Enterprise Case Management workflow and actions.
- **FATCA Administration and Configuration Guide:** provides comprehensive instructions on FATCA rules configurations, system administration, application parameters, and the daily operations and maintenance of the FATCA system.
- **Data Interface Specification (DIS) Guide:** identifies the data that an client should supply as a part of data ingestion for the FATCA application to work.
- **Administration Guide:** introduces Enterprise Case Management (ECM) users to User Role mapping.
- **Configuration Guide:** provides details about the configuration settings done in ECM.
- **FATCA DIS Data Map:** provides the table and column information from DIS that should be populated for the FATCA application to work.
- **Admin Tools Guide:** describes how to access the Administration Tools and configure alert and case generation.

To find additional information about how Oracle Financial Services solves real business problems, see our Web site at www.oracle.com/financialservices.

Conventions Used in this Guide

Table 1 lists the conventions used in this guide.

Table 1. Conventions Used in this Guide

Convention	Meaning
<i>Italics</i>	<ul style="list-style-type: none">● Names of books, chapters, and sections as references● Emphasis
Bold	<ul style="list-style-type: none">● Object of an action (menu names, field names, options, button names) in a step-by-step procedure● Commands typed at a prompt● User input

Table 1. Conventions Used in this Guide (Continued)

Convention	Meaning
Monospace	<ul style="list-style-type: none">● Directories and subdirectories● File names and extensions● Process names● Code sample, including keywords and variables within text and as separate paragraphs, and user-defined program elements within text
<Variable>	Substitute input value

The Foreign Account Tax Compliance Act (FATCA) is a regulation from the Internal Revenue Service and the US Treasury Department to prevent US Taxpayers who hold financial assets in non-US financial institutions (foreign financial institution or FFIs) and other offshore vehicles from avoiding their US tax obligations. US taxpayers' investments have become increasingly global in scope. FFIs now provide a significant portion of the investment opportunities for, and act as intermediaries with respect to the investments of, US taxpayers. Like US financial institutions, FFIs are generally in the best position to identify and report with respect to their US customers and substantial US owners. The intent behind the law is for FFIs to identify and report US citizens who may have accounts or investments with the FFI.

In order to comply, FFIs are required to enter into an agreement with the US Treasury or comply with intergovernmental agreements (IGAs) entered into by their local jurisdictions. Failure to enter into an agreement or provide required documentation will result in the imposition of a withholding tax (currently specified as 30%) on certain payments (US source Fixed, Determinable, Annual, Periodical (FDAP) income) made to such customers or counterparties. Failure to impose the requisite withholding under FATCA requirements could result in significant financial exposure.

For details regarding the FATCA regulations, refer to the IRS or US Treasury links:

<http://www.irs.gov/Businesses/Corporations/Foreign-Account-Tax-Compliance-Act-FATCA>

<http://www.treasury.gov/resource-center/tax-policy/treaties/Pages/FATCA.aspx>

The OFSFATCA application allows clients to assess accounts and customers and assign a FATCA status, as per the guidelines defined by the IRS. OFSFATCA also allows clients to configure rules as per the regulator's requirement modifications or their own business processes.

FATCA Assessments Process Workflow

OFSFATCA enables financial institutions to identify their accounts and customers who meet the criteria for reporting and withholding under FATCA regulations. A series of batch processes compare these accounts and customers against various criteria and determine a FATCA status. The resulting assessments and statuses are then available to users for due diligence and confirmation of the derived status.

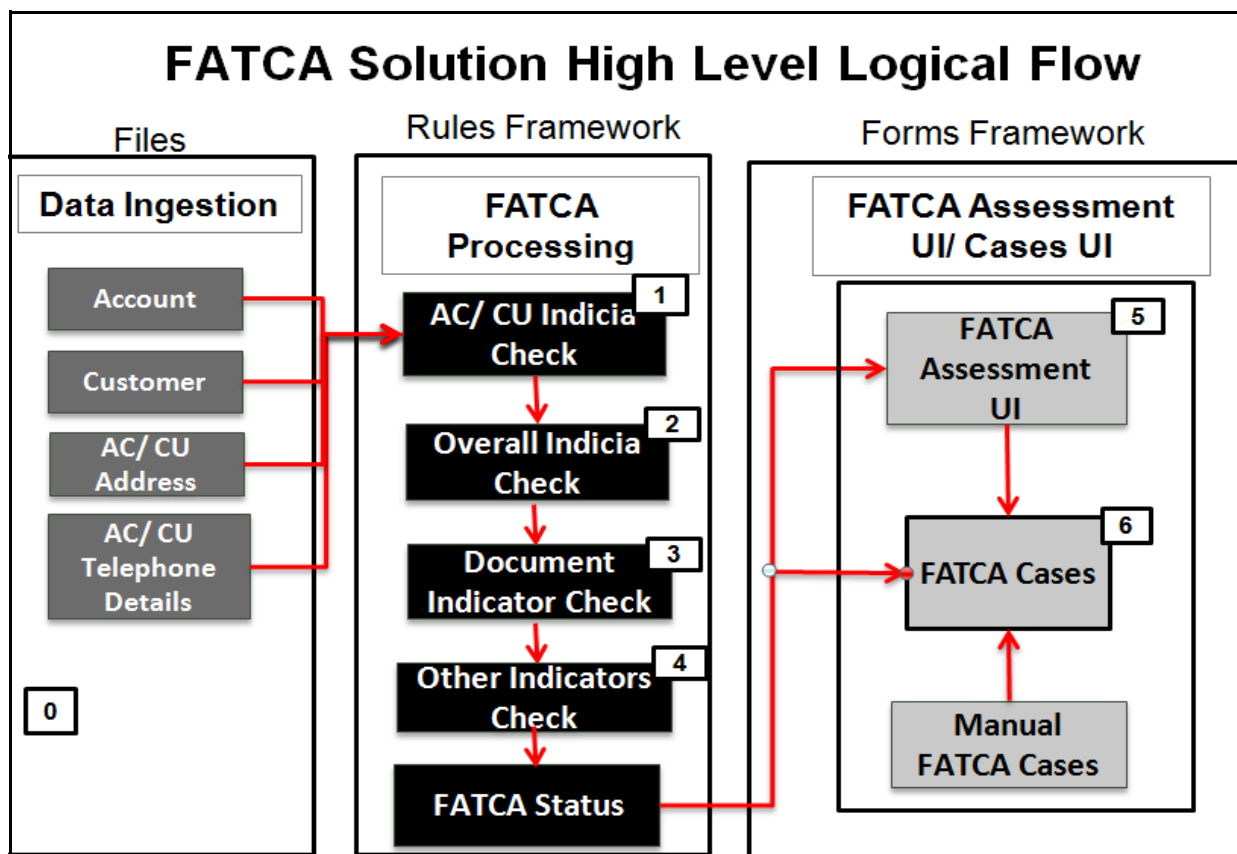


Figure 1. FATCA Assessments Process Workflow

The OFSFATCA application process contains the following steps:

- Data Ingestion
- Identify Customers and Accounts Based on the FATCA Processing Period
- FATCA Account Assessment
- FATCA Customer Assessment
- Case Creation
- End of the Day Process

Data Ingestion

Clients are expected to load the data ingestion files with field details as required by FATCA. Failure to provide these details may lead to the wrong FATCA status.

For more details regarding the files and columns that are required for FATCA Assessment, refer to the *OFSFATCA DIS Data Map*.

Identify Customers and Accounts Based on the FATCA Processing Period

Accounts and customers considered for the FATCA Assessment are described below. At a high level, accounts and customers are categorized as New, Existing (Change in Customer or Account Information), or Pre-existing. The Pre-existing customers are usually assessed as a one-time deployment initiation activity. New and Existing customers can be processed periodically.

Table 2 lists the assessment categories.

Table 2. Assessment Categories

Category	Description
New Accounts	Accounts that have been opened after a last processing date will be considered as New Accounts.
New Customers	New Customers are customers who own New Accounts.
Existing Accounts	Accounts whose information has changed on or after the processing period are considered existing accounts. <ul style="list-style-type: none"> ● All users who have ownership roles are also selected and assessed. ● Changes are identified based on the Account Change Log Summary. For more details on the fields which are considered by the Change Log Summary, refer to <i>Table 8 Account Change Log</i>, in Appendix B.
Existing Customer	Customers whose information has changed on or after the processing period are considered existing customers. <ul style="list-style-type: none"> ● All related accounts are also selected and assessed. ● Changes are identified based on Customer Change Log Summary. For more details, refer to <i>Table 9</i> in Appendix B.
Pre-Existing Accounts	Accounts that have been opened before a date specified by the client.
Pre-Existing Customers	Owning customers of Pre-existing Accounts.

FATCA Account Assessment

After identifying the accounts for FATCA assessment for the processing period, FATCA assessment is executed and a FATCA status assigned to each account. Refer to the *Chapter 2, FATCA Assessments*, for more information.

FATCA Customer Assessment

A customer's FATCA status is derived based on the FATCA status of the accounts the customer owns.

If the owned accounts have a different FATCA status, the customer's FATCA status is assigned based on the priority configured for the FATCA status. A lower number indicates a higher priority FATCA status.

For more details on how to set priorities, refer to the *OFSFATCA Administration and Configuration Guide*.

Case Creation

To do further due diligence and update the FATCA status, clients can promote the assessments to cases. This promotion to case is automatically based on some configuration or manually be configured.

For more details, refer to the *OFSEATCA Administration and Configuration Guide*.

End of the Day Process

The End of Day process is used to set the processing date and other maintenance activities. For more details, refer to the *OFSEATCA Administration and Configuration Guide*.

This chapter discusses the FATCA rules for assessing Accounts and Customers. Accounts are assessed as per the FATCA rules configured to derive the account FATCA status. A customer FATCA status is derived from the FATCA status of the owned accounts. Each account or customer selected for assessment is verified against FATCA rules for the Jurisdiction, Geographic Jurisdiction, and Business Domain of the account or customer. Jurisdiction and Business Domain are mandatory but Geographic Jurisdiction is optional in customer and account files. While it's advisable to use Geographic Jurisdiction, if clients don't want to use Geographic Jurisdiction then they need to disable it in rules configuration. Refer to the *FATCA Administration and Configuration Guide*, for details regarding rules configuration.

If there are no FATCA rules defined for a specific Jurisdiction, Geographic Jurisdiction, or Business Domain then the account or customer is assessed as per the default FATCA rule definitions packaged in the application.

Following are types of FATCA Assessments:

- Account Assessment
- Customer Assessment

Account Assessment

The FATCA status of an account is derived based on the following criteria:

- Overall US Indicia
- Document Indicators
- FATCA Account Assessment Indicators

Overall US Indicia

Indicia means circumstances which tend to show or indicate that something is probable.

US Indicia indicates the US status of accounts or customers. This section describes how OFSFATCA derives the US Indicia for accounts and customers.

- Account Overall US Indicia
- Customer Overall US Indicia

Account Overall US Indicia

Account US Indicia is derived from account US Indicia rules. Rules which are considered for Account Indicia are classified under rule group Indicia-AC. Refer to the *Appendix A, FATCA Assessment Rules* account indicia section for the list of rules.

Account Overall US Indicia is derived in the following way:

- If any one of the account US Indicia rules is YES then the account's overall US Indicia is YES.

- If none of the account US Indicia rules of an account are YES, then the application must factor the owning customer(s)'s US Indicia to find the overall US Indicia of the account. For more details on Customer Overall US Indicia, refer to the *Customer Overall US Indicia* section.
- If any of the owning customers's overall US indicia is YES, then the accounts overall US Indicia is YES.
- If none of the account US Indicia rule is YES, and none of the owning customer's overall Indicia is YES, then the accounts overall US Indicia is NO.

Customer Overall US Indicia

Overall US Indicia of Customer is derived from the Customer Indicia rules. Rules considered for Customer Indicia (Individual) and Customer Indicia (Entity) are classified under Rule Groups Indicia- IND CU and Indicia – ENT CU respectively. Refer to the *FATCA Assessment Rules* Customer Indicia section for the list of rules.

Customer Overall US Indicia is derived as mentioned below:

- If any of the Customer Indicia rules is YES then the overall indicia of the Customer is YES.
- If none of the customer related indicia rules are YES and the Customer is an individual Customer, then the Overall Customer Indicia is NO.
- If none of the customer related indicia rules are YES and the Customer is not an individual Customer (an organization or institution), then the FATCA rules check for the customer indicia of individual stakeholders of the organization.
- Stakeholders are considered only when their percentage ownership in the organization is more than a configurable threshold. For more information, refer to the *FATCA Administration and Configuration Guide* how to configure the ownership percentage threshold for individual customers).
- If any individual stakeholder has US Indicia as YES then that organization's Overall US Indicia is updated to YES.
 - If an organization is owned by another organization then FATCA will keep looking for the subsequent individual owners till the ownership percentage drops below the FATCA defined threshold or there are no more individual stakeholder left. US indicia of only individual owners will be considered.
 - If the organization doesn't have any individual customers with US Indicia as YES then the organization's Overall US Indicia will be set to N.

Document Indicators

As per FATCA regulation, documents can be classified into two categories:

- Withholding Certificates
- Documentary Evidence

Withholding Certificates

The term withholding certificate means a Form W-8, Form W-9, or any other certificate that under the code or regulations certifies or establishes the status of a payee or beneficial owner.

Documentary Evidence

Documentary Evidence refers to the documents, other than a withholding certificate or written statement that a withholding agent is permitted to rely upon to determine the foreign status or FATCA status.

Documents evidence has two types:

- Documentation Used to Establish Foreign Status
- Documentation Used to Establish the FATCA Status

Documentation Used to Establish Foreign Status

The following types of documents support establishing foreign status:

- **Certificate of Residence:** A certificate of residence issued by an appropriate tax official of the country in which the payee claims to be a resident. This indicates that the payee has filed its most recent income tax return as a resident of that country.
- **Individual Government Identification:** With respect to an individual, any valid identification issued by an authorized government body that is typically used for identification purposes.
- **Entity Government Documentation:** With respect to an entity, any official documentation issued by an authorized government body (for example, a government, agency, or a municipality).
- **Third-party Credit Report:** For a payment made with respect to an offshore obligation to an individual.
- **Certification of Foreign Tax Reporting:** Statement that is filed with the tax authority of the country in which the account is maintained as part of that country's resident reporting requirements.
- **Certificate of Loss of Nationality Indicator:** Individual's Certificate of Loss of Nationality of the United States.

Documentation Used to Establish the FATCA Status

The following types of documents are supported to establish FATCA status:

- **General Documentary Evidence:** For entities other than participating FFIs or registered deemed-compliant FFIs.
General documentary evidence includes following documents:
 - Organizational document
 - Financial statement
 - Third-party credit report
 - Letter from a government agency
 - Statement from a government web site
- **Pre-existing Account Documentary Evidence:** Provided there is no US indicia associated for the payee that has not been cured, pre-existing account documentary evidence includes any standardized industry code or any classification in the withholding agent's records for the payee that was recorded prior to or on January 1, 2012, or if the withholding agent was formed after that date, six months after its formation.
- **Payee Specific Documentary Evidence:** Payee-specific documentary evidence includes a letter from an auditor or attorney located in the US that is unrelated to the withholding agent or payee and is subject to the authority of a regulatory body, bankruptcy filing, corporate resolution, and copy of a stock market index or other document permitted by the specific payee documentation requirements.

OFSFATCA handles documents used to establish the foreign status of the accounts and customers through document indicators in the customer and account data. The Application is dependent on the document indicator

flags provided at customer level. OFSFATCA summarizes the respective documents availability for customer or related accounts to identify the FATCA status.

The Final document indicator claiming foreign status is marked as YES if any one of the document indicator claiming foreign status is present. Document Indicators are classified under Rule Group Document Indicator – CU. For list of document indicators, refer to the *Appendix A, FATCA Assessment Rules - Foreign Status Claim Document Indicators* section.

To determine the FATCA Status, the OFSFATCA application uses the FATCA Organization type rather than doing an availability check on documents used to establish the FATCA status. Appropriate FATCA Organization Types should be provided by the clients. Details on FATCA Organization Type are described in the section - *FATCA Account Assessment Indicators*.

FATCA Account Assessment Indicators

In addition to Overall US Indicia and Document Indicator, OFSFATCA also considers the following indicator flags to determine the FATCA status.

- Recalcitrant Indicator
- Owing Customer Type
- FATCA Organization Type
- Deriving FATCA Status

Recalcitrant Indicator

The term recalcitrant refers to any account holder who is not an FFI, is not exempt (for example, depository accounts with balance less than 50000), does not qualify for any of the exceptions from the documentation requirements and who meets following criteria:

- Fails to comply with requests by the FFI for the documentation or information that is required to determine the status of such account as a US account or Non-US account.
- Fails to provide a valid Form W-9 (Form W-9 is used when a business needs to have your name, address and taxpayer identification number so the business can issue a tax document to you and to the IRS), correct name and Taxpayers Identifier Number (TIN) combination.
- If foreign law would prevent reporting by the participating FFI the account holder (or substantial US owner of an account holder that is a US-owned foreign entity) fails to provide a valid and effective waiver of such law to permit such reporting.

OSFSATCA identifies the FATCA Status of an Account based on the Recalcitrant Indicator received from the client. If the Recalcitrant Indicator of for the Account is YES then Account's FATCA Status is identified as Recalcitrant.

This rule is categorized under Rule group FATCA Indicator – AC. Refer to the *Appendix A- FATCA Account Assessment Indicators* section for more details.

Owing Customer Type

Account FATCA status is dependent on the owing customer's type. OFSFATCA customer type can be any of the following types:

- **Organization:** the customers who own the account are non-financial organizations

- **Financial Institution:** the customers who own the account are financial organizations
- **Individual:** the customers who own the account are individual persons

Note: The account is owned by different types of customer then the Owing Customer Type for the Account is marked as Indeterminate Multiple Entity Types.

This rule is mentioned under Rule group FATCA Indicator – CU. Refer to *Appendix A* FATCA Account Assessment Indicators section, for more details.

FATCA Organization Type

The FATCA Organization Type is a classification of customer’s organization as per the FATCA regulation. Account FATCA status considers the FATCA Organization type National Federation of Federal Employees of the owning customer. The OFSFATCA supports the following FATCA Organization types:

- **Excepted (Non Financial Foreign Entity) NFFE:** Entities which are excluded from the FFI definition and not subject to withholding.
- **Passive (Non Financial Foreign Entity) NFFE:** Any NFFE that is not otherwise excepted or active will be a passive NFFE and must provide withholding agents with a certification regarding its substantial US owners.
- **Active NFFE:** Active NFFEs are entities that conduct an actual business activity other than holding assets.
- **Participating FFI:** FFI that enters into an agreement with the IRS to undertake certain due diligence, withholding and reporting requirements for US account holders.
- **Non-participating FFI:** FFI that does not enter into an agreement with the IRS and is not deemed compliant or excepted.
- **Registered Deemed Compliant:** FFIs that have registered with the IRS and obtained a GIIN.
- **Exempt Beneficial Owner:** owners mainly governmental entities, international organizations and central banks which are exempt from FATCA.
- **Owner Documented FFI:** small entities which are considered FFIs. They are not required to sign the FFI agreement.

Note: If the account is owned by more than one customer and the owning customers have different FATCA organization types then FATCA rules mark the FATCA Organization Type of the Account as Indeterminate – Multiple Org Types.

FATCA Organization types are classified under the Rule group - FATCA Indicators AC/CU. Refer to the table mentioned in *Appendix A, FATCA Assessment Rules - FATCA Account Assessment Indicators* for more details.

Deriving FATCA Status

Account FATCA Status is derived based on the following indicators.

- Account Overall US Indicia
- Final Document Indicator
- Recalcitrant Indicator
- Owing Customer Type
- FATCA Organization Type

For the complete set of rules, refer to the *Appendix C, FATCA Status classification table*.

Customer Assessment

The OFSFATCA Customer FATCA status is derived from the FATCA status of the accounts that the customer owns. If a customer owns more than one account, then the customer FATCA status is based on the account FATCA status that has highest priority (the lower the number, the higher the priority).

Clients can configure the customer FATCA status priority. For more details on how to configure customer FATCA status priority, refer *FATCA Administration and Configuration Guide*.

FATCA Configurability

OSFATCA allows clients to configure the rules to suit their business process or update those rules as per any modifications prescribed by the regulator.

The following modifications can be done to the FATCA Assessment rules:

- Editing the rule name displayed in user interface
- Editing rule values of Indicia and Document indicators
- Editing the rule
- Modifying the Account Net worth amount
- Enabling and disabling the rules used to derive for FATCA Status

For details on how administration users can modify FATCA Assessment rules, refer to the *FATCA Administration and Configuration Guide*.

FATCA Assessments are a batch process and can be executed once a year or periodically (Daily, Weekly, Monthly, Quarterly, and Half-yearly) depending on client needs. Refer to the *OFSFATCA Administration and Configuration Guide* to learn how to execute batches.

Clients can schedule FATCA Assessments batches as per their business process. OFSFATCA classifies accounts and customers in the following ways:

- **New Accounts and Customers:** All accounts opened after the set date will be considered new accounts. Customers owning those accounts are new customers.
- **Existing Accounts and Customers:** All accounts and customers in the system are selected as a part of this process if some data has changed for the account or customer. Refer to *Appendix B, Change Log Parameters*, for the fields used for identifying existing customers and accounts.
- **Pre-existing Accounts and Customers:** All accounts opened between the specified range of the date will be selected as a part of this process. Customers owning those accounts are consider as pre-existing customers. This identification helps to enable FATCA processing for all existing customers or accounts as a deployment initiation activity.
- **Exempt Accounts and Customer:** All accounts opened between the specified range of the date will be selected as a part of this process. To identify the assessments with certain conditions Exempt batch is run at the end of the year. This creates new assessment if the threshold value is breached and updates few fields in the existing assessment.

Deployment Initiation

When clients implement OFSFATCA, they may start their assessment in one of the following ways:

- Start with new accounts or customers and customers or accounts which have changed information. (New and Existing) then you can process all Pre-existing customer or accounts later.
- Start with all Pre-existing customers or accounts in the system as a part of deployment initiation and then assess the New and Existing accounts or customers periodically.

Deployment initiation or processing Pre-existing customers or accounts requires the Pre-existing processing to be enabled. Refer to the *OFSFATCA Administration and Configuration Guide*, for more information on how to enable and disable processes.

Periodic Assessments

When running FATCA assessment periodically (daily, weekly, monthly, quarterly, and so on) accounts and customers are assessed in the following ways:

- Batch execution schedule is set for the frequency - Daily, Weekly, Monthly, Quarterly, Half-Yearly, and so on
- Assessments happen periodically for new and existing accounts (if there is change in information) and customers

- Cases are generated depending on the FATCA status
- Changes in Account and Customer data lead to new assessment, so multiple assessments and cases can be created per account or customer

Exempt Batch:

1. At the end of the year run an Exempt batch which will identify all the assessment with following conditions

- Assessment created by Pre existing batch or Exempt batch one year back from Exempt batch date

Note: Exempt batch date can be configured in admin configuration parameter. Refer to admin guide for more information.

- Latest assessment for an account with **Exempt** FATCA status
2. It will create new assessments if the threshold values are breached for end of year balance.
3. It will update following fields in existing assessments if threshold values are not breached.
- Assessment Batch name
 - Assessment created date

FATCA Assessment Rules

FATCA rules can be classified into multiple rule groups. Some rules are directly used in deriving a FATCA status while some rules are used to derive values which define the FATCA status.

The following rule groups are used for classification in FATCA :

- Indicia
- Foreign Status Claim Document Indicators
- FATCA Account Assessment Indicators

Indicia

Indicia is circumstances which tend to show or indicate that something is probable.

Following are the rule groups in Indicia:

- Non-Individual Customer Indicia
- Individual Customer Indicia
- Account Indicia

Non-Individual Customer Indicia

The following table defines the US Indicia rules for entity customers. A Customer’s US Indicia is YES if any of the following rules satisfies the condition.

Table 3: Non Individual Customer Indicia Rules

Rule Group Classification	Rule Group	Rule Name	Rule Description	Condition
Indicia_Indicator_Cust	Indicia – ENT CU	Primary Citizenship	Customer’s primary country of citizenship	If value equals US then US Indicia = Y. If value is not equal to US then US Indicia = N.
Indicia_Indicator_Cust	Indicia – ENT CU	Secondary Citizenship	Customer’s secondary country of citizenship.	If value equals US then US Indicia = Y. If value is not equal to US then US Indicia = N.
Indicia_Indicator_Cust	Indicia – ENT CU	Country of birth	Customer’s country of birth.	If value equals US then US Indicia = Y. If value is not equal to US then US Indicia = N.

Table 3: Non Individual Customer Indicia Rules

Indicia_Indicator_Cust	Indicia – ENT CU	Country of Mailing Address	Country code of Mailing address.	If country of one mailing address is equal to US then US Indicia = Y. If country of none of the mailing addresses is equal to US then US Indicia = N.
Indicia_Indicator_Cust	Indicia – ENT CU	Country of Home Address	Country code of home address.	If country of one home address is equal to US then US Indicia = Y. If country of none of the home addresses is equal to US then US Indicia = N.
Indicia_Indicator_Cust	Indicia – ENT CU	Country of Residence	Customer's country of residence	If value equals US then US Indicia = Y. If value is not equal to US then US Indicia = N.
Indicia_Indicator_Cust	Indicia – ENT CU	Country of Phone Number	Country associated with this phone number.	If value of one phone country is equal to US then US Indicia = Y. If value of none of the phone countries is equal to US then US Indicia = N.
Indicia_Indicator_Cust	Indicia – ENT CU	Mail Handling Instruction	Handling instructions for the use of this address relative to this customer (for example, "In care of" or "Hold Mail").	If Mail Handling Instruction for all addresses is in (H, I) then US Indicia = Y. If Mail Handling Instruction for one address is not in (H,I) then US Indicia = N.

Individual Customer Indicia

The following table defines the US Indicia rules for individual customers. A customer's US Indicia is YES if any of the following rules satisfies the condition.

Table 4: Individual Customer Indicia

Rule Group Classification	Rule Group	Rule Name	Rule Description	Condition
Indicia_Indicator_Cust	Indicia – IND CU	Country of Residence	Customer's country of residence	If value equals US then US Indicia = Y. If value is not equal to US then US Indicia = N.
Indicia_Indicator_Cust	Indicia – IND CU	Country of Mailing Address	Country code of mailing address.	If country of one mailing address is equal to US then US Indicia = Y. If country of none of the mailing addresses is equal to US then US Indicia = N.

Table 4: Individual Customer Indicia

Indicia_Indicator_Cust	Indicia – IND CU	Country of Home Address	Country code of home address.	If country of one home address is equal to US then US Indicia = Y. If country of none of the home addresses is equal to US then US Indicia = N.
Indicia_Indicator_Cust	Indicia – IND CU	Country of Phone Number	Country associated with this phone number.	If value of one phone country is equal to US then US Indicia = Y. If value of none of the phone countries is equal to US then US Indicia = N.
Indicia_Indicator_Cust	Indicia – IND CU	Mail Handling Instruction	Handling instructions for the use of this address relative to this customer (for example, In care of or "Hold Mail).	If Mail Handling Instruction for all addresses is in (H, I) then US Indicia = Y. If Mail Handling Instruction for one address is not in (H,I) then US Indicia

Account Indicia

The following table defines the US Indicia rules for Accounts. Account's US Indicia is YES if any of the following parameters satisfies the condition.

Table 5: Account Indicia Parameters

Rule Group Classification	Rule Group	Rule Name	Rule Description	Condition
Indicia_Indicator_Acct	Indicia – AC	Standing Instructions to US Account Indicator	Indicator of standing instructions to transfer funds from this account to an account maintained in the United States.	If value equals Y then US Indicia = Y. If value is not equal to Y then US Indicia = N.
Indicia_Indicator_Acct	Indicia – AC	US POA or Signatory Indicator	Indicator that this account has power of attorney or signatory authority granted to a person with a US address.	If value equals Y then US Indicia = Y. If value is not equal to Y then US Indicia = N.
Indicia_Indicator_Acct	Indicia – AC	Mail Handling Instruction	Handling instructions for the use of this address relative to this account (for example, In care of or Hold Mail).	If Mail Handling Instruction for all addresses is in (H, I) then US Indicia = Y. If Mail Handling Instruction for one address is not in (H,I) then US Indicia

Table 5: Account Indicia Parameters

Indicia_Indicator_Acc	Indicia – AC	Country of Phone Number	Country associated with this phone number.	<p>Purpose of the phone number should be 'Home'</p> <p>If value of one phone country is equal to US then US Indicia = Y.</p> <p>If value of none of the phone countries is equal to US then US Indicia = N.</p>
Indicia_Indicator_Acc	Indicia – AC	Account Address	Address of the Account. The purpose of Address should be Mailing or Primary.	<p>If the Account Address is US where Address Country Code = US then US Indicia = Y.</p> <p>Else US Indicia = N</p>

Foreign Status Claim Document Indicators

The following table defines the owning customer's document indicators which are used to derive the US Indicia of a related account. Account US Indicia is NO if any owning customer is able to provide a document claiming foreign status.

Table 6: Foreign Status Claim Document Indicators

Rule Group Classification	Rule Group	Rule Name	Rule Description	Condition
Document Indicator	Document Indicator - CU	Non-US Document Holder Indicator	Any official documentation claiming non-US status	If the value is Y then US Indicia = N
Document Indicator	Document Indicator - CU	Certificate of Loss of Nationality Indicator	Individual's certificate of Loss of nationality of the United States.	If the value is Y then US Indicia = N
Document Indicator	Document Indicator - CU	Entity government documentation indicator	Any official documentation issued by an authorized government body	If the value is Y then US Indicia = N
Document Indicator	Document Indicator - CU	Third-party credit report indicator	For a payment made with respect to an off-shore obligation to an individual.	If the value is Y then US Indicia = N
Document Indicator	Document Indicator - CU	Non-US Citizen and Resident Indicator	A certificate of residence issued by an appropriate tax official of the country.	If the value is Y then US Indicia = N
Document Indicator	Document Indicator - CU	Certification of foreign tax reporting	Statement that is filed with the tax authority of the country.	If the value is Y then US Indicia = N

FATCA Account Assessment Indicators

The following table defines the FATCA account assessment indicators. In addition to Overall US Indicia and Document Indicator, FATCA account assessment indicators are used to derive the FATCA status.

Table 7: FATCA Account Assessment Indicators

Rule Group Classification	Rule Group	Rule Name	Rule Description	Condition
FATCA Indicators	FATCA Indicator – AC	Account Aggregate Net-worth Amount (in base currency)	Aggregate Account balance	As per the aggregate account balance accounts are identified as Exempt, Low Value, and High Value.
FATCA Indicators	FATCA Indicator – CU	Customer Type	Account owner's customer type	
FATCA Indicators	FATCA Indicator – CU	FATCA Organization Type Code	Account owner's FATCA organization type	
FATCA Indicators	FATCA Indicator – AC	Recalcitrant Indicator	Account Recalcitrant Indicator flag	If value is Y FATCA status = Recalcitrant

Change Log Parameters

This appendix explains parameters considered for reassessing an account or customer.

This Appendix covers the following topics:

- Account Change Log Parameters
- Customer Change Log Parameters

Account Change Log Parameters

The following table defines the parameters considered for reassessing an account. If any of the account fields have been modified (for example, if the Change Log Count is more than 0) then the account will be reassessed by the Existing Account batch process.

Table 8: Account Change Log

Parameter Name	Parameter Details	Rule Description
Country of phone number change count	Count of country of phone number changes for this account for the specified date.	If the change count is more than 0 then the account will be assessed again.
Address Change Count	Count of address changes for this account on Change Date.	If the change count is more than 0 then the account will be assessed again.
Mail Handling Instruction Change Count	Count of Mail Handling Instruction changes for this account on the specified date.	If the change count is more than 0 then the account will be assessed again.
Standing Instructions to US Account Change Count	Count of Standing Instructions to US Account flag changes for this account on the specified date.	If the change count is more than 0 then the account will be assessed again.

Table 8: Account Change Log

US POA or Signatory Change count	Count of US POA or Signatory flag changes for this account on the specified date.	If the change count is more than 0 then the account will be assessed again.
Recalcitrant Change Count	Count of Recalcitrant flag changes for this account on the specified date.	If the change count is more than 0 then the account will be assessed again.

Customer Change Log Parameters

The following table defines the parameters considered for reassessing a customer. If any of the following customer fields have been modified (for example, if the Change log is less than 0) then the customer will be reassessed by the existing Customer batch process.

Table 9: Customer Change Log

Parameter Name	Parameter Details	Rule Description
Certificate of Loss of Nationality Change Count	Count of Certificate of Loss of Nationality flag changes for this customer on the specified date.	If the change count is more than 0 then the customer will be assessed again.
Citizenship Country 1 Change Count	Count of citizenship country #1 changes for this customers on the specified date.	If the change count is more than 0 then the customer will be assessed again.
Citizenship Country 2 Change Count	Count of citizenship country #2 changes for is customer on the specified date.	If the change count is more than 0 then the customer will be assessed again.nge
Country of Birth Change Count	Count of Country of Birth changes for this customer on the specified date.	If the change count is more than 0 then the customer will be assessed again.
Country of Phone Number Change Count	Count of country of phone number changes for this customer for the specified date.	If the change count is more than 0 then the customer will be assessed again.
Address Change Count	Count of mailing address changes to any address element for this customer.	If the change count is more than 0 then the customer will be assessed again.

Table 9: Customer Change Log

Mail Handling Instruction Change Count	Count of Mail Handling Instruction changes for this customer on the specified date.	If the change count is more than 0 then the customer will be assessed again.
Non US Citizen and Resident Change Count	Count of Non-US Citizen and Resident flag changes for this customer on the specified date.	If the change count is more than 0 then the customer will be assessed again.
Non-US Document Holder Change Count	Count of Non-US Document Holder flag changes for this customer on the specified date.	If the change count is more than 0 then the customer will be assessed again.
Recalcitrant Change Count	Count of Recalcitrant flag changes for this customer on the specified date.	If the change count is more than 0 then the customer will be assessed again.
Residential Country Change Count	Count of residential country changes for this customer on the specified date.	If the change count is more than 0 then the customer will be assessed again.

APPENDIX C

FATCA Status Classification

This Appendix details classification of FATCA statuses.

Table 10: FATCA Status Classification

Process Type	Overall US Indicia	Document Indicator claiming foreign status	Recalcitrant Indicator	Account Net Worth Amount(Lower Limit)	Account Net Worth Amount (Upper Limit)	Customer Type Code of the Owning Customer	FATCA Organization Type	FATCA Status
New Account/Existing Account	Y	N	!Y	NA	NA	NA	NOT IN (EXC NFFE,PAS NFFE,ACT NFFE,PFFI,RDC,NPFFI,EB O,CDC,OWNER DOC FFI)	US Person
New Account/Existing Account	Y	Y	!Y	NA	NA	NA	NOT IN (EXC NFFE,PAS NFFE,ACT NFFE,PFFI,RDC,NPFFI,EB O,CDC,OWNER DOC FFI)	Non US Person
New Account/Existing Account	N	NA	!Y	NA	NA	NA	NOT IN (EXC NFFE,PAS NFFE,ACT NFFE,PFFI,RDC,NPFFI,EB O,CDC,OWNER DOC FFI)	Non US Person
New Account/Existing Account	NA	NA	Y	NA	NA	NA	NA	Recalcitrant

Table 10: FATCA Status Classification

Process Type	Overall US Indicia	Document Indicator claiming foreign status	Recalcitrant Indicator	Account Net Worth Amount(Lower Limit)	Account Net Worth Amount (Upper Limit)	Customer Type Code of the Owning Customer	FATCA Organization Type	FATCA Status
New Account/Existing Account	NA	NA	!Y	NA	NA	ORG	EXC NFFE	Excepted NFFE
New Account/Existing Account	NA	NA	!Y	NA	NA	ORG	PAS NFFE	Passive NFFE
New Account/Existing Account	NA	NA	!Y	NA	NA	ORG	ACT NFFE	Active NFFE
New Account/Existing Account	NA	NA	!Y	NA	NA	FIN	PFFI	Participating FFI
New Account/Existing Account	NA	NA	!Y	NA	NA	FIN	RDC	Registered Deemed Complaint FFI

Table 10: FATCA Status Classification

Process Type	Overall US Indicia	Document Indicator claiming foreign status	Recalcitrant Indicator	Account Net Worth Amount(Lower Limit)	Account Net Worth Amount (Upper Limit)	Customer Type Code of the Owning Customer	FATCA Organization Type	FATCA Status
New Account/Existing Account	NA	NA	!Y	NA	NA	FIN	NPFFI	Non-participating FFI
New Account/Existing Account	NA	NA	!Y	NA	NA	FIN	EBO	Exempt Beneficial Owner
New Account/Existing Account	NA	NA	!Y	NA	NA	FIN	CDC	Certified Deemed Compliant FFI
New Account/Existing Account	NA	NA	!Y	NA	NA	FIN	OWNER DOC FFI	Owner Documented FFI
New Account/Existing Account	If an Account doesn't satisfy any of the rules it should be marked as Indeterminate.							Indeterminate
Preexisting Account	NA	NA	NA	<=50000	NA	IND	null	Exempt

Table 10: FATCA Status Classification

Process Type	Overall US Indicia	Document Indicator claiming foreign status	Recalcitrant Indicator	Account Net Worth Amount(Lower Limit)	Account Net Worth Amount (Upper Limit)	Customer Type Code of the Owning Customer	FATCA Organization Type	FATCA Status
Preexisting Account	NA	NA	NA	<=250000	NA	!IND	NA	Exempt
Preexisting Account	Y	N	!Y	50000<	<=10000 00	IND	null	US Person
Preexisting Account	N	NA	!Y	50000<	<=10000 00	IND	null	Non US Person
Preexisting Account	Y	Y	!Y	50000<	<=10000 00	IND	null	Non US Person
Preexisting Account	Y	N	!Y	250000<	<=10000 00	!IND	NOT IN (EXC NFFE,PAS NFFE,ACT NFFE,PFFI,RDC,NPFFI,EB O,CDC,OWNER DOC FFI)	US Person
Preexisting Account	N	NA	!Y	250000<	<=10000 00	!IND	NOT IN (EXC NFFE,PAS NFFE,ACT NFFE,PFFI,RDC,NPFFI,EB O,CDC,OWNER DOC FFI)	Non US Person
Preexisting Account	Y	Y	!Y	250000<	<=10000 00	!IND	NOT IN (EXC NFFE,PAS NFFE,ACT NFFE,PFFI,RDC,NPFFI,EB O,CDC,OWNER DOC FFI)	Non US Person

Table 10: FATCA Status Classification

Process Type	Overall US Indicia	Document Indicator claiming foreign status	Recalcitrant Indicator	Account Net Worth Amount(Lower Limit)	Account Net Worth Amount (Upper Limit)	Customer Type Code of the Owning Customer	FATCA Organization Type	FATCA Status
Preexisting Account	Y	N	!Y	NA	>100000 0	NA	NOT IN (EXC NFFE,PAS NFFE,ACT NFFE,PFFI,RDC,NPFFI,EB O,CDC,OWNER DOC FFI)	US Person
Preexisting Account	N	NA	!Y	NA	>100000 0	NA	NOT IN (EXC NFFE,PAS NFFE,ACT NFFE,PFFI,RDC,NPFFI,EB O,CDC,OWNER DOC FFI)	Non US Person
Preexisting Account	Y	Y	!Y	NA	>100000 0	NA	NOT IN (EXC NFFE,PAS NFFE,ACT NFFE,PFFI,RDC,NPFFI,EB O,CDC,OWNER DOC FFI)	Non US Person
Preexisting Account	NA	NA	!Y	250000<	<=10000 00	ORG	EXC NFFE	Excepted NFFE
Preexisting Account	N	NA	!Y	NA	>100000 0	ORG	EXC NFFE	Excepted NFFE
Preexisting Account	NA	NA	!Y	250000<	<=10000 00	ORG	PAS NFFE	Passive NFFE
Preexisting Account	NA	NA	!Y	NA	>100000 0	ORG	PAS NFFE	Passive NFFE

Table 10: FATCA Status Classification

Process Type	Overall US Indicia	Document Indicator claiming foreign status	Recalcitrant Indicator	Account Net Worth Amount(Lower Limit)	Account Net Worth Amount (Upper Limit)	Customer Type Code of the Owning Customer	FATCA Organization Type	FATCA Status
Preexisting Account	NA	NA	!Y	250000<	<=1000000	ORG	ACT NFFE	Active NFFE
Preexisting Account	NA	NA	!Y	NA	>1000000	ORG	ACT NFFE	Active NFFE
Preexisting Account	NA	NA	!Y	250000<	<=1000000	FIN	PFFI	Participating FFI
Preexisting Account	NA	NA	!Y	NA	>1000000	FIN	PFFI	Participating FFI
Preexisting Account	NA	NA	!Y	250000<	<=1000000	FIN	RDC	Registered Deemed Compliant FFI
Preexisting Account	NA	NA	!Y	NA	>1000000	FIN	RDC	Registered Deemed Compliant FFI
Preexisting Account	NA	NA	!Y	250000<	<=1000000	FIN	NPFFI	Non-participating FFI
Preexisting Account	NA	NA	!Y	NA	>1000000	FIN	NPFFI	Non-participating FFI
Preexisting Account	NA	NA	Y	50000<	<=1000000	IND	NULL	Recalcitrant
Preexisting Account	NA	NA	Y	250000<	<=1000000	!IND	NA	Recalcitrant

Table 10: FATCA Status Classification

Process Type	Overall US Indicia	Document Indicator claiming foreign status	Recalcitrant Indicator	Account Net Worth Amount(Lower Limit)	Account Net Worth Amount (Upper Limit)	Customer Type Code of the Owning Customer	FATCA Organization Type	FATCA Status
Preexisting Account	NA	NA	Y	NA	1000000	NA	NA	Recalcitrant
Preexisting Account	NA	NA	!Y	250000<	<=1000000	FIN	EBO	Exempt Beneficial Owner
Preexisting Account	NA	NA	!Y	NA	>1000000	FIN	EBO	Exempt Beneficial Owner
Preexisting Account	NA	NA	!Y	250000<	<=1000000	FIN	CDC	Certified Deemed Compliant FFI
Preexisting Account	NA	NA	!Y	NA	>1000000	FIN	CDC	Certified Deemed Compliant FFI
Preexisting Account	NA	NA	!Y	250000<	<=1000000	FIN	OWNER DOC FFI	Owner Documented FFI
Preexisting Account	NA	NA	!Y	NA	>1000000	FIN	OWNER DOC FFI	Owner Documented FFI
Preexisting Account	No rules matched			50000<	<=1000000	IND	NA	Indeterminate

Table 10: FATCA Status Classification

Process Type	Overall US Indicia	Document Indicator claiming foreign status	Recalcitrant Indicator	Account Net Worth Amount(Lower Limit)	Account Net Worth Amount (Upper Limit)	Customer Type Code of the Owning Customer	FATCA Organization Type	FATCA Status
Preexisting Account	No rules matched			250000<	<=1000000	!IND	NA	Indeterminate
Preexisting Account	No rules matched			NA	>1000000	NA	NA	Indeterminate

This table details Exempt Batch Classification:

Table 11: Exempt Batch Classification

Process Type	Overall US Indicia	Document Indicator claiming foreign status	Recalcitrant Indicator	Year End Balance	Customer Type Code of the Owning Customer	FATCA Organization Type	FATCA Status
Exempt	All Values	All Values	All Values	<1000000 \$	IND	No Value	Exempt
Exempt	All Values	All Values	All Values	<1000000 \$	ORG, FIN	All Values	Exempt
Exempt	Y	N	N	>1000000 \$	IND	No Value	US Person
Exempt	N	All Values	N	>1000000 \$	IND	No Value	Non US Person
Exempt	Y	Y	N	>1000000 \$	IND	No Value	Non US Person
Exempt	Y	N	N	>1000000 \$	ORG, FIN	No Value, Other Org Type	US Person
Exempt	N	All Values	N	>1000000 \$	ORG, FIN	No Value, Other Org Type	Non US Person
Exempt	Y	Y	N	>1000000 \$	ORG, FIN	No Value, Other Org Type	Non US Person
Exempt	Y	N	N	>1000000 \$	All Values	No Value, Other Org Type	US Person
Exempt	N	All Values	N	>1000000 \$	All Values	No Value, Other Org Type	Non US Person
Exempt	Y	Y	N	>1000000 \$	All Values	No Value, Other Org Type	Non US Person

Table 11: Exempt Batch Classification

Process Type	Overall US Indicia	Document Indicator claiming foreign status	Recalcitrant Indicator	Year End Balance	Customer Type Code of the Owning Customer	FATCA Organization Type	FATCA Status
Exempt	All Values	All Values	N	>1000000 \$	ORG	EXC NFFE	Excepted NFFE
Exempt	All Values	All Values	N	>1000000 \$	ORG	PAS NFFE	Passive NFFE
Exempt	All Values	All Values	N	>1000000 \$	ORG	ACT NFFE	Active NFFE
Exempt	All Values	All Values	N	>1000000 \$	FIN	PFFI	Participating FFI
Exempt	All Values	All Values	N	>1000000 \$	FIN	RDC	Registered Deemed Compliant FFI
Exempt	All Values	All Values	N	>1000000 \$	FIN	NPFFI	Non-participating FFI
Exempt	All Values	All Values	N	>1000000 \$	FIN	EBO	Exempt Beneficial Owner
Exempt	All Values	All Values	N	>1000000 \$	FIN	CDC	Certified Deemed Compliant FFI
Exempt	All Values	All Values	N	>1000000 \$	FIN	OWNER DOC FFI	Owner Documented FFI

Table 11: Exempt Batch Classification

Process Type	Overall US Indicia	Document Indicator claiming foreign status	Recalcitrant Indicator	Year End Balance	Customer Type Code of the Owning Customer	FATCA Organization Type	FATCA Status
Exempt	All Values	All Values	Y	>1000000 \$	IND	No Values	Recalcitrant
Exempt	All Values	All Values	Y	>1000000 \$	FIN, ORG	All Values	Recalcitrant
Exempt	All Values	All Values	Y	>1000000 \$	All Values	All Values	Recalcitrant

This Appendix lists and details acronyms used in this guide.

Table 12: Acronym

Acronym	Meaning
FATCA	Foreign Account Tax Compliance Act
OFS	Oracle Financial Services
FDAP	Fixed Determinable, Annual, and Periodic
FFI	Foreign Financial Institution
GIIN	Global Intermediary Identification Number
IRS	Internal Revenue Service
NFFE	Non Financial Foreign Entity
PFFI	Participating Foreign Financial Institution
TIN	Tax Identifier Number
IGA	Intergovernmental Agreement

