

Common errors to avoid in completing Common Reporting Standard (CRS) forms

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

Short Description of Error	Explanation of Error
Incomplete permanent and/or mailing	The full address needs to be entered. This would
address	include entering the full residence address and
	country name.
Declarations and signature part (certification	Certification section is required to be completed
section) not completed	as it attests signer is authorized and information
	provided is accurate. Signature, print name, date
	and capacity must be completed.
Country of Tax Residence and related Taxpayer Identification Number section has missing information.	Please fully complete the table indicating the Account Holder's tax residence country or countries (i.e. where the entity is treated as a resident of the country for purposes of that country's income tax) and the Account Holder's TIN (if any) for each country indicated. If the Account Holder is tax resident in more than three countries, please use a separate sheet. If a TIN is unavailable, please provide the appropriate reason A, B or C as defined below: Reason A — The country where the Account Holder is liable to pay tax does not issue TINs to its residents Reason B — The Account Holder is unable to obtain a TIN or equivalent number (If this reason is selected, please explain why the Account Holder is unable to obtain a TIN in the below table) Reason C — No TIN is required because
	the tax residence jurisdiction that issued the TIN does not require a Financial Institution to collect and report the TIN

Part-2 Entity type is not selected	Account holder status is required to be marked on the form.
Controlling persons form not submitted	The Controlling Persons form needed to be completed if marked: • 1(a)i - Financial institution - investment entity. An investment entity located in a non-participating jurisdiction and managed by another financial institution. • 1(g) - Passive NFE Any other selection marked does not require the controlling persons form.
Additional Controlling persons listed in our books and records; no Controlling Person forms provided	If additional controlling persons are identified in our books/records that are not mentioned on the CRS entity form, we must request those controlling persons be added or explanation provided to why they are not considered controlling persons.
TIN entered in improper format	Format of TIN should match to format for that country's TIN.
CRS country indicia triggered (additional country listed on the form/or in our internal records)	Indicia is referring to an indicator that an entity could be considered as a tax resident in another country. For CRS purposes, if the country triggering indicia is a CRS adoptive country we would expect it to be entered on the form for tax residency. Otherwise, we need explanation from client for why that country is not entered as a country of tax residency.
Non-Citi CRS form submitted (missing the CIC language/due diligence requirements)	CRS forms must have the following information included: 1. All required data elements (demographic or other); 2. Required language that it is the client's responsibility to notify us within 30 days of any change in circumstance. Where the client has provided a valid IRS W9 or W-8 series form, then we can accept the CRS self-certificate if the CIC notification period is within up to 90 days. 3. Attestation statement that client is providing the information accurately and to best of their knowledge; 4. Acknowledgement or consent that their information would be reported for automatic exchange purposes;

Signer is POA. Additional documentation is	We need the power of attorney or similar
needed	document that clearly shows the signer is
	authorized and granted authority to sign on
	behalf of the entity entered on line one of the tax
	form.
DocuSign/AdobeSign on form, missing	The certificate of completion provides specific
Certification of Completion/Signer Certificate	details relating to the person signing and
	reference to the document being signed. The
	certificate of completion is required for the tax
	team to proceed for validation.
Entity name does not match our books and	Entity name on form is expected to match to the
records	account holder opening the account.