SAINT CHRISTOPHER AND NEVIS

INLAND REVENUE DEPARTMENT

AEOI

COMPLIANCE FORM GUIDE

v4

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SAINT CHRISTOPHER AND NEVIS INLAND REVENUE DEPARTMENT
AEOI COMPLIANCE FORM GUIDE v4

1. Introduction

This Guide explains how to complete the revised SKNIRD AEOI Compliance Form v4. The revised form is designed to support SKNIRD supervision of Reporting Financial Institutions under FATCA and CRS, with particular emphasis on CRS due diligence, reporting accuracy, governance, data quality, remediation and evidence retention.

Completion of the form does not by itself prove full CRS compliance.

2. Acronyms and Abbreviations

AEOI	Automatic Exchange of Information
AML	Anti money laundering
CRS	Common Reporting Standard
EC/XCD	Eastern Caribbean Dollar
EU	European Union
FATCA	Foreign Account Tax Compliance Act
FFI	Foreign Financial Institutions
FI	Financial Institution
FSRC	Financial Services Regulatory Commission
IGA	Intergovernmental Agreement
IRS	Internal Revenue Service
KYC	Know Your Customer (standards)
NFE	Non-Financial Entities
OECD	Organisation for Economic Cooperation and Development
RFI	Reporting Financial Institution
SKN	St. Kitts and Nevis
SKNIRD	St. Kitts and Nevis Inland Revenue Department
TIN	Taxpayer Identification Number
USA	United States of America
USD	United Sates Dollar

3. General Information

This Compliance Form is to be completed by all Reporting Financial Institutions (RFI) duly registered with the St. Kitts and Nevis Inland Revenue Department (SKNIRD) pursuant to the

Foreign Account Tax Compliance Act (FATCA) and the Common Reporting Standard (CRS) Act and Regulations.

FATCA- Foreign Account Tax Compliance Act

The Foreign Account Tax Compliance Act (FATCA) is a United States federal law enacted in 2010 to combat offshore tax evasion by U.S. taxpayers. FATCA requires certain Foreign Financial Institutions (FFIs) to identify and report information on financial accounts held by specified U.S. persons and certain foreign entities with substantial U.S. owners.

To facilitate FATCA implementation, the Government of St. Kitts and Nevis signed a Model 1B Intergovernmental Agreement (IGA) with the Government of the United States on 31 August 2015. Under the IGA, Reporting Financial Institutions in St. Kitts and Nevis report the required FATCA information to the St. Kitts and Nevis Inland Revenue Department (SKNIRD), which subsequently exchanges the information with the U.S. Internal Revenue Service (IRS).

St. Kitts and Nevis has enacted legislation to implement the obligations under the IGA, including requirements for RFIs to conduct due diligence, identify U.S. Reportable Accounts, maintain appropriate records, and submit annual FATCA reports to the SKNIRD. The legislation also provides the legal framework for the collection and exchange of information with the IRS.

For FATCA purposes, a U.S. Person generally includes:

- A U.S. citizen.
- A U.S. resident alien (including certain lawful permanent residents (Green Card holders)).
- A corporation, partnership, trust, or estate organized or created under the laws of the United States or any U.S. state.
- Any other person treated as a U.S. person under the U.S. Internal Revenue Code.
- Foreign Financial Institutions

Foreign Financial Institutions (FFIs) include, but are not limited to:

- Depository Institutions (such as banks and credit unions).
- Custodial Institutions (such as custodians and certain broker-dealers).
- Investment Entities (including certain investment funds and investment managers).
- Specified Insurance Companies that issue or are obligated to make payments with respect to cash value insurance contracts or annuity contracts.

For each U.S. Reportable Account, RFIs are generally required to report information including:

- Name of the account holder.
- Address.
- U.S. Taxpayer Identification Number (TIN), where required.

- Date of birth (for individual account holders, where applicable).
- Account number or functional equivalent.
- Name and identifying number of the RFI.
- Account balance or value at the end of the reporting period (or upon account closure).
- Certain income, gross proceeds, or other amounts credited or paid to the account, as required under the applicable reporting rules.

RFIs must apply the FATCA due diligence procedures prescribed under the Intergovernmental Agreement and domestic legislation to both new and pre-existing individual and entity accounts. These procedures are designed to identify U.S. Reportable Accounts and certain entity accounts with one or more substantial U.S. owners.

Once identified, reportable accounts must be reported annually to the SKNIRD through the AEOI Portal in accordance with the applicable reporting deadlines and technical reporting requirements.

Reporting Thresholds: The Model 1 IGA generally requires RFIs to apply the due diligence and reporting rules prescribed under the agreement rather than relying on a single reporting threshold. While certain thresholds and exemptions may apply to specific categories of pre-existing accounts during the due diligence process, RFIs should review all relevant individual and entity accounts in accordance with the applicable FATCA due diligence rules to determine whether they are reportable.

The thresholds of US$50,000 for individuals and US$250,000 for certain entity accounts relate to specific due diligence provisions under the IGA and, in some cases, to separate U.S. taxpayer reporting obligations. They should not be interpreted as a general exemption from FATCA reporting for all accounts. See Summary of FATCA reporting for U.S taxpayers.

Common Reporting Standard (CRS)

The Common Reporting Standard (CRS) is the global standard for the automatic exchange of financial account information, developed by the Organisation for Economic Co-operation and Development (OECD) at the request of the G20. Introduced in 2014, CRS provides a framework for participating jurisdictions to combat offshore tax evasion by enhancing tax transparency through the annual exchange of financial account information.

The Government of St. Kitts and Nevis implemented CRS through the Common Reporting Standard (Automatic Exchange of Financial Account Information) Act, which came into force following its enactment on 21 December 2016. Financial Institutions (FIs) in St. Kitts and Nevis are required to comply with the CRS obligations set out in the legislation and any applicable regulations or guidance.

Under CRS, RFIs must establish and maintain due diligence procedures to determine the tax residency of account holders and certain controlling persons of entity account holders. Where an account is held directly or indirectly by one or more persons who are tax resident in another participating jurisdiction, the account may be classified as a Reportable Account. RFIs are required to collect, maintain, and report prescribed financial account information to the Competent Authority in St. Kitts and Nevis, which then exchanges the information with the relevant participating jurisdictions in accordance with international agreements.

CRS is based on a standardized due diligence and reporting framework that applies to both new and pre-existing individual and entity accounts. Financial Institutions must review accounts in accordance with the CRS due diligence rules to determine whether they are reportable. More than 100 jurisdictions have committed to implementing CRS, including all European Union Member States and many major international financial centres.

Reporting Thresholds: As a general rule, CRS does not provide a minimum account balance threshold below which accounts are exempt from reporting. However, limited thresholds and exemptions may apply to certain pre-existing accounts or specific categories of financial accounts where permitted under the CRS Standard and incorporated into domestic legislation. Accordingly, RFIs should apply the applicable CRS due diligence procedures to all relevant new and pre-existing individual and entity accounts to determine whether an account is reportable.

Where a Reportable Account has a negative account balance or value at the end of the reporting period, the RFI should report the account as having a nil (zero) account balance or value, in accordance with the CRS reporting requirements.

4. Mandatory and Conditional Fields

Mandatory fields must be completed for every RFI. Conditional fields must be completed where the facts apply, such as where the FI uses a service provider, has undocumented accounts, submits a nil filing, uses manual spreadsheets, or claims Excluded Account treatment. Numeric fields should be completed with 0 where the value is nil.

5. Document Retention and Evidence Expectations

The FI should retain self-certifications, documentary evidence, due diligence working papers, account review outputs, source-system reports, reportable-account lists, portal receipts, correction logs, exception registers, reconciliation workpapers, QA/internal audit reports, training logs and service-provider oversight documents for at least six years as required by SKNIRD legislation.

6. Section-by-Section Guidance

SECTION 1 - FINANCIAL INSTITUTION PROFILE AND CRS CLASSIFICATION

Purpose: Captures the identity, regulatory status, CRS classification and risk profile of the Financial Institution (FI).

No.	Field	Guidance for completion
1.1	Financial Institution Portal Registration Number	Mandatory. Enter the number assigned upon registration with the SKNIRD AEOI Reporting Portal.
1.2	Financial Institution (FI) Legal Name	Mandatory. Enter the name of the registered entity exactly as shown in official records.
1.3	Reporting Period / Calendar Year	Mandatory. Enter the calendar year for which the FI is reporting.
1.4	Is the FI licensed or registered with the Financial Services Regulatory Commission (FSRC)?	Mandatory. Select YES or NO. The FI must indicate whether they are licensed to operate or registered with the FSRC.
1.5	FSRC incorporation, licence or registration number	Complete where applicable. Enter the requested information exactly as shown in official records.
1.6	SKNIRD TIN / tax registration number	Mandatory. Enter the requested information exactly as shown in official records.
1.7	CRS classification of the FI (select all that apply)	Mandatory. Select all applicable options. If Other is selected, provide details in the narrative field.
1.8	Basis for CRS classification, including relevant law, products, activities, income/assets test and approval date	Mandatory.
1.9	If an Investment Entity, trust, fund, foundation or similar vehicle, identify trustee, manager, sponsor, investment manager, administrator and jurisdiction of each	Complete where applicable.
1.10	Does the FI have related entities, branches, segregated portfolios, cells or managed accounts relevant to CRS reporting?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.
1.11	If YES to 1.10, list each related entity/branch/cell/account and explain whether it reports separately or is included in this return	Complete where applicable.
1.12	Has the FI reviewed whether any	Mandatory. Select YES or NO. Where NO indicates a

No.	Field	Guidance for completion
	change in business activities, products, account types, ownership or service providers changed its CRS classification during the reporting period?	control gap or where YES requires context, provide explanation or attach evidence.
1.13	Approximate percentage of account holders that are non-resident for tax purposes	Mandatory. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records.
1.14	Approximate percentage of account holders that are entities	Mandatory. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records.
1.15	Approximate percentage of account holders onboarded remotely or through non-face-to-face channels	Mandatory. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records.
1.16	Approximate percentage of account holders introduced or onboarded through intermediaries	Mandatory. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records.
1.17	Approximate percentage of account holders connected with higher-risk sectors or indicia under existing AML/KYC or CRS reasonableness frameworks (e.g., gaming, complex structures, CBI/RBI risk indicators)	Mandatory. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records.

SECTION 2 - GOVERNANCE, POLICIES, CONTROLS AND OVERSIGHT

Purpose: Assesses whether the FI has an effective compliance framework to implement CRS due diligence, reporting and correction obligations.

No.	Field	Guidance for completion
2.1	Name and title of the officer responsible for CRS/AEOI compliance	Mandatory.
2.2	Does senior management or the board receive and review CRS/AEOI compliance updates?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.
2.3	Date of the most recent senior management/board review of CRS/AEOI compliance	Complete where applicable. Enter date in DD/MM/YYYY format.

No.	Field	Guidance for completion
2.4	Has the FI established and maintained written FATCA/CRS policies and procedures?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.
2.5	Date the CRS/AEOI policy was last approved or updated	Mandatory. Enter date in DD/MM/YYYY format.
2.6	Frequency of policy review	Mandatory. Select all applicable options. If Other is selected, provide details in the narrative field or attachment.
2.7	Do the written procedures cover all of the following: self-certification, reasonableness checks, indicia review, TIN/DOB collection, change in circumstances, undocumented accounts, entity classification, controlling persons, reporting, corrections, record retention, outsourcing and data security?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.
2.8	Has the FI implemented and complied with its written CRS/AEOI policies and procedures during the reporting period?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.
2.9	Has the FI performed internal quality assurance, file testing or sample checks over CRS data in the last 12 months?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.
2.10	Date and scope of the most recent CRS/AEOI quality assurance review or internal audit	Complete where applicable.
2.11	Key exceptions or control weaknesses identified and remediation actions taken	Complete where applicable. Provide a concise explanation with dates, scope, root cause, impact and remediation where applicable.
2.12	Number of accounts or files flagged for CRS/AEOI correction during the reporting period	Mandatory. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records.
2.13	Does the FI maintain a CRS/AEOI reporting calendar with maker-checker review before submission?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.
2.14	Does the FI provide ongoing CRS/AEOI training to relevant officers and service providers?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.
2.15	Frequency of CRS/AEOI training	Complete where applicable. Select all applicable

No.	Field	Guidance for completion
		options. If Other is selected, provide details in the narrative field.
2.16	Date of last CRS/AEOI training and percentage of relevant staff trained	Complete where applicable.
2.17	Are CRS/AEOI records retained for at least six years in an electronically readable and retrievable format?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.

SECTION 3 - ONBOARDING, SELF-CERTIFICATION AND REASONABLENESS CHECKS

Purpose: Tests whether new accounts and changes in circumstances are supported by valid self-certifications and reasonable AML/KYC checks.

No.	Field	Guidance for completion
3.1	Does the FI obtain a valid CRS self-certification before or at account opening for all new individual accounts?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.
3.2	Does the FI obtain a valid CRS self-certification before or at account opening for all new entity accounts and controlling persons where required?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.
3.3	Does the FI prevent or restrict account activation where a required self-certification is missing, incomplete or unreliable, except where a documented temporary exception applies?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.
3.4	Does the FI confirm the reasonableness of each self-certification against AML/KYC information and other account information?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.
3.5	Does the FI have a documented process to identify unreliable or incorrect self-certifications, including inconsistencies with address, place of birth, telephone number, mailing instructions, powers of attorney, controlling persons, CBI/RBI	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.

No.	Field	Guidance for completion
	indicators or other account data?	
3.6	Does the FI collect TINs for each reportable jurisdiction unless a documented CRS exception applies?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.
3.7	Does the FI collect date of birth and address information for individual account holders and controlling persons where required?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.
3.8	Does the FI use reasonable efforts to obtain missing TINs and dates of birth for pre-existing reportable accounts?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.
3.9	Does the FI monitor changes in circumstances and obtain a new valid self-certification where required?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.
3.10	Describe controls over remote onboarding, introduced business or intermediary onboarding as they relate to CRS self-certification and reasonableness checks	Complete where applicable.
3.11	Number of accounts opened during the reporting period without a valid CRS self-certification at the time of onboarding	Mandatory. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records.
3.12	Number of accounts with missing, invalid or unverifiable TINs as at reporting date	Mandatory. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records.
3.13	Number of accounts with missing date of birth, address or controlling person information as at reporting date	Mandatory. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records.

SECTION 4 - DUE DILIGENCE OF PRE-EXISTING ACCOUNTS

Purpose: Collects evidence on review of pre-existing individual and entity accounts, including high value review and remediation.

No.	Field	Guidance for completion
4.1	Total number of pre-existing individual accounts maintained at the start of the	Mandatory. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account

No.	Field	Guidance for completion
	reporting period	lists and reporting records.
4.2	Number of lower value pre-existing individual accounts reviewed during or before the reporting period	Mandatory. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records.
4.3	Number of high value pre-existing individual accounts reviewed, including relationship manager inquiry and paper/electronic record search where applicable	Mandatory. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records.
4.4	Number and value of pre-existing individual accounts not yet reviewed; explain reason and expected completion date	Mandatory. Provide a concise explanation with dates, scope, and remediation where applicable.
4.5	Total number of pre-existing entity accounts maintained at the start of the reporting period.	Mandatory. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records.
4.6	Number of pre-existing entity accounts reviewed for FI/NFE classification and reportable controlling persons	Mandatory. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records.
4.7	Number of Passive NFEs identified with one or more reportable controlling persons	Mandatory. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records.
4.8	Number of accounts whose reportable status changed during the period because of a change in circumstances	Mandatory. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records.
4.9	Describe unresolved review gaps, escalation steps and remediation deadlines	Complete where applicable. Provide a concise explanation with dates, scope, root cause, impact and remediation where applicable.

SECTION 5 - CRS REPORTING HISTORY, SUBMISSIONS AND DATA QUALITY

Purpose: Captures CRS filing status, reportable population, nil filing rationale, portal errors and correction controls.

No.	Field	Guidance for completion
5.1	Has the FI submitted its CRS filing for the reporting period through the AEOI portal?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.

No.	Field	Guidance for completion
5.2	Was a nil CRS filing submitted?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.
5.3	If a nil CRS filing was submitted, provide the documented rationale and explain the review performed to confirm no reportable accounts	Complete where applicable. Provide a concise explanation with dates, scope, root cause, impact and remediation where applicable.
5.4	CRS submission date	Complete where applicable. Enter date in DD/MM/YYYY format.
5.5	Number of CRS reportable accounts submitted for the reporting period	Mandatory. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records.
5.6	Total year-end balance/value of CRS reportable accounts submitted	Mandatory. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records.
5.7	Number of jurisdictions reported to / represented in the CRS filing	Mandatory. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records.
5.8	Were any CRS filings rejected by the AEOI portal or returned for correction?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.
5.9	If YES to 5.8, number of rejected/corrected filings and error types (schema, TIN, DOB, name/address, country code, account balance, duplicate records, other)	Complete where applicable. Provide a concise explanation with dates, scope, root cause, impact and remediation where applicable.
5.10	Were all corrections or amended reports resubmitted within the required timeframe?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.
5.11	Does the FI reconcile the CRS reportable list to source systems such as core banking, registry, investor records, trust records, insurance systems or administrator records?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.
5.12	Date of last CRS reportable-list reconciliation and discrepancies found/remediated	Complete where applicable. Provide a concise explanation with dates, scope, root cause, impact and remediation where applicable.

SECTION 6 - CRS FINANCIAL ACCOUNT DATA SUMMARY

Purpose: Provides a high-level account population profile for risk assessment and verification against CRS filings and supporting records.

No.	Field	Guidance for completion
6.1	Total number of Financial Accounts maintained by the FI at year-end	Mandatory. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records.
6.2	Total value of Financial Accounts maintained by the FI at year-end	Mandatory. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records.
6.3	Number and value of depository accounts, if applicable	Complete where applicable. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records.
6.4	Number and value of custodial accounts, if applicable	Complete where applicable. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records.
6.5	Number and value of equity/debt interests in Investment Entities, trusts, funds, foundations or similar arrangements, if applicable	Complete where applicable. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records.
6.6	Number and value of cash value insurance contracts or annuity contracts, if applicable	Complete where applicable. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records.
6.7	Number of accounts closed during the reporting period and included in CRS review	Mandatory. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records.
6.8	Does the FI treat reportable accounts with negative balances as nil for reporting purposes?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.
6.9	Number and value of Excluded Accounts claimed under CRS, with legal basis for exclusion	Mandatory. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records. Provide legal basis for Excluded Accounts classification.
6.10	Does the FI maintain evidence supporting each account treated as excluded or non-reportable?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.

SECTION 7 - UNDOCUMENTED ACCOUNTS, MISSING DATA AND REMEDIATION

Purpose: Collects details on undocumented accounts, missing data, root causes and remediation progress.

No.	Field	Guidance for completion
7.1	Does the FI have any CRS undocumented accounts for the reporting period?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.
7.2	Number and total value of CRS undocumented accounts	Mandatory. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records.
7.3	Main reasons for undocumented accounts (select all that apply)	Complete where applicable. Select all applicable options. If Other is selected, provide details in the narrative field or attachment.
7.4	Number of CRS accounts missing TIN	Mandatory. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records.
7.5	Number of CRS accounts missing date of birth	Mandatory. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records.
7.6	Number of CRS accounts missing address	Mandatory. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records.
7.7	Number of CRS accounts missing valid self-certification	Mandatory. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records.
7.8	Describe follow-up actions taken to obtain missing information, including dates, notices issued, account restrictions/escalations and expected remediation date	Complete where applicable. Provide a concise explanation with dates, scope, root cause, impact and remediation where applicable.
7.9	Does the FI maintain an exception register for missing CRS data and undocumented accounts?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.
7.10	Date the exception register was last reviewed by management	Complete where applicable. Enter date in DD/MM/YYYY format.

SECTION 8 - AML/KYC AND AEOI DATA INTEGRATION

Purpose: Assesses how AML/KYC information supports CRS due diligence and whether inconsistencies are identified and corrected.

No.	Field	Guidance for completion
8.1	Which entity carries out AML/KYC obligations?	Mandatory. Select all applicable options. If Other is selected, provide details in the narrative field or attachment.
8.2	Name and location of AML/KYC service provider, if not performed by the FI	Complete where applicable. Provide a concise explanation with dates, scope, root cause, impact and remediation where applicable.
8.3	Are AML/KYC obligations performed in accordance with applicable St. Kitts and Nevis laws and regulations?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.
8.4	Date and scope of last AML/KYC audit or regulatory review relevant to CRS data	Complete where applicable. Provide a concise explanation with dates, scope, root cause, impact and remediation where applicable.
8.5	Does the FI regularly reconcile AML/KYC data to CRS self-certification and reporting data?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.
8.6	Date of last AML/KYC-CRS reconciliation, number of discrepancies found and number remediated	Complete where applicable. Enter the requested information exactly as shown in official records.
8.7	Do AML/KYC refresh triggers feed into CRS change-in-circumstances procedures?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.
8.8	Has the FI identified identity, residence, CBI/RBI, nominee, complex ownership or possible tax-evasion indicators relevant to CRS reasonableness checks?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.
8.9	If YES to 8.8, provide a general description of indicators and CRS action taken. Do not provide personally identifiable information.	Complete where applicable. Provide a concise explanation with dates, scope, root cause, impact and remediation where applicable.

SECTION 9 - SYSTEMS, OUTSOURCING, RECORDS AND EVIDENCE

Purpose: Assesses the reliability of CRS data sources, controls over manual processes, service-provider oversight and available evidence.

No.	Field	Guidance for completion
9.1	Systems or records used to identify, classify and report CRS accounts (core banking, administrator, investor registry, trust records, spreadsheets, other)	Mandatory. Provide a concise explanation with dates, scope, root cause, impact and remediation where applicable.
9.2	Does the FI use manual spreadsheets or manual adjustments in CRS reporting?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.
9.3	If YES to 9.2, describe access controls, review controls, version control and reconciliation controls	Complete where applicable. Provide a concise explanation with dates, scope, root cause, impact and remediation where applicable.
9.4	Does the FI outsource CRS due diligence, data preparation, reporting, IT or recordkeeping activities?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.
9.5	If YES to 9.4, provide service provider name, jurisdiction, function performed, contract/SLA reference and oversight controls	Complete where applicable. Provide a concise explanation with dates, scope, root cause, impact and remediation where applicable.
9.6	Does the FI retain self-certifications, documentary evidence, due diligence working papers, reporting files and correction evidence for at least six years?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.
9.7	Can the FI produce the evidence package requested by SKNIRD within 15 working days?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation, or attach evidence.
9.8	Evidence attached or available on request (select all that apply)	Complete where applicable. Select all applicable options. If Other is selected, provide details in the narrative field or attachment.

SECTION 10 - FATCA SUMMARY (FOR AEOI ALIGNMENT)

Purpose: Retains a concise FATCA summary to preserve the AEOI nature of the form while the enhanced control questions address CRS effectiveness.

No.	Field	Guidance for completion
10.1	Has the FI submitted its FATCA filing for the reporting period?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide

No.	Field	Guidance for completion
		explanation or attach evidence.
10.2	Was a nil FATCA filing submitted?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.
10.3	Number and total value of U.S. reportable accounts	Mandatory. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records.
10.4	Number and total value of recalcitrant accounts, if any	Complete where applicable. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records.
10.5	Number of FATCA accounts missing TIN, DOB, address or self-certification and remediation actions	Complete where applicable. Enter a numeric value. Use 0 where none. Values should reconcile to source systems, account lists and reporting records.
10.6	Were any FATCA filings rejected or corrected in the portal?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.

SECTION 11 - DECLARATION AND CERTIFICATION

Purpose: Confirms management accountability for the accuracy and completeness of the information provided.

No.	Field	Guidance for completion
11.1	Signatory full name	Mandatory. Enter the requested information exactly as shown in official records.
11.2	Signatory title/position	Mandatory. Enter the requested information exactly as shown in official records.
11.3	Telephone number and email address	Mandatory. Enter the requested information exactly as shown in official records.
11.4	Name and title of officer who verified the CRS/AEOI data before submission	Mandatory. Enter the requested information exactly as shown in official records.
11.5	Date of verification	Mandatory. Enter date in DD/MM/YYYY format.
11.6	Has the signatory reviewed the completed form and supporting evidence before submission?	Mandatory. Select YES or NO. Where NO indicates a control gap or where YES requires context, provide explanation or attach evidence.
11.7	Declaration: *I hereby declare that the information given on this form is to the best of my knowledge and belief, true and correct and that I have the authority to disclose the*	Mandatory. Provide the identity of the person submitting the Form on behalf of the Financial Institution and to declare that the information is true

No.	Field	Guidance for completion
	information provided. *I understand that a Financial Institution that refuses to or fails to provide any information requested by the Competent Authority, without lawful or reasonable excuse, commits an offense and is liable to a penalty not exceeding one hundred thousand dollars. Further, I understand that a Financial Institution that fails to provide accurate information, including the omission of requested information, is liable to a penalty of thirty thousand under the CRS Act, twenty-five thousand dollars and a further two hundred and fifty dollars per day that the information is not provided under the provisions of the FATCA Act.* *Be aware that a person who makes a false declaration commits an offence under Section 8 of the Perjury Act, of the Revised Laws of Saint Christopher and Nevis and that person can upon conviction, be liable to imprisonment for a term of not less than two years and not more than five years, or to a fine of not less than EC $10,000 and not more than EC $30,000, or both .*	and correct to the best of their knowledge. The Form must be submitted to the SKNIRD via email to aeoi.skn@ird.gov.kn on or before the prescribed deadline.
11.8	Signature of Director / Authorised Representative	Mandatory. Enter the requested information exactly as shown in official records.
11.9	Date (DD/MM/YYYY)	Mandatory. Enter date in DD/MM/YYYY format.

SECTION 12 – GLOSSARY OF TERMS

This glossary is provided as a companion reference to the AEOI Compliance Form v4. It is intended to assist Reporting Financial Institutions when completing the form and should be read with the applicable Saint Christopher and Nevis FATCA and CRS legislation, regulations and SKNIRD guidance.

FATCA Terms

AML/KYC Procedures

For FATCA purposes, AML/KYC Procedures means the customer due diligence procedures of a Reporting Saint Kitts and Nevis Financial Institution pursuant to the anti-money laundering or similar requirements of Saint Kitts and Nevis to which the institution is subject.

Financial Account

For FATCA purposes, the term generally means an account maintained by a Financial Institution, including depository accounts, custodial accounts, certain equity or debt interests, cash value insurance contracts and annuity contracts, subject to applicable exclusions.

Financial Institution

For FATCA purposes, a Financial Institution generally includes a Custodial Institution, Depository Institution, Investment Entity, or Specified Insurance Company.

Recalcitrant Account Holder

For FATCA purposes, a recalcitrant account holder generally means an account holder that fails to provide information or documentation required to determine whether the account is a U.S. account, including required U.S. identifying information, ownership information, or applicable waivers.

Reportable Account

For FATCA purposes, a reportable account generally means a financial account required to be reported under the applicable FATCA IGA, domestic FATCA legislation and implementing rules, including accounts held by specified U.S. persons and certain non-U.S. entities with substantial U.S. ownership or control, as applicable.

Self-Certification

For FATCA purposes, a self-certification or other permitted certification is documentation obtained from the account holder to establish FATCA status, U.S. status, entity classification, or other information relevant to FATCA due diligence and reporting.

CRS Terms

Act / CRS Act

The Common Reporting Standard (Automatic Exchange of Financial Account Information) Act, Cap. 21.22 of the Laws of Saint Christopher and Nevis, as amended. The Act gives effect in Saint Christopher and Nevis to the automatic exchange of financial account information in taxation matters.

Regulations / CRS Regulations

The Common Reporting Standard (Automatic Exchange of Financial Account Information) Regulations made under the CRS Act, including amendments. The Regulations prescribe due diligence, reporting, recordkeeping, electronic filing, service-provider and related obligations for Reporting Financial Institutions.

Standard

The CRS Act defines the Standard as the Common Reporting Standard, including the Commentaries thereon, approved by the OECD Council on 15 July 2014, which contains reporting and due diligence procedures for the automatic exchange of information. Words and expressions used in the Act or Regulations generally have the same meaning as in the Standard unless a contrary intention appears.

Agreement

The Convention on Mutual Administrative Assistance in Tax Matters, which provides for exchange of information on an automatic basis as described in the Standard and as set out in the First Schedule to the CRS Act.

Competent Authority

The Financial Secretary or the Financial Secretary's authorized representative for purposes of the CRS Act.

Department / SKNIRD

The Inland Revenue Department of Saint Christopher and Nevis.

AML/KYC

Under the CRS Regulations, AML/KYC means the customer due diligence procedures of a Reporting Financial Institution pursuant to the anti-money laundering or similar requirements to which that Reporting Financial Institution is subject.

Reporting Financial Institution

Any Saint Christopher and Nevis Financial Institution that is not a Non-Reporting Financial Institution. This includes a Financial Institution resident in Saint Christopher and Nevis, excluding any branch located outside Saint Christopher and Nevis, and any branch located in Saint Christopher and Nevis of a Financial Institution that is not resident in Saint Christopher and Nevis.

Non-Reporting Financial Institution

A category of Saint Christopher and Nevis Financial Institution set out in the Second Schedule to the CRS Act, or otherwise treated as non-reporting under the Standard and applicable domestic rules, that is excluded from reporting because it presents a low risk of being used to evade tax.

Financial Institution

A Custodial Institution, Depository Institution, Investment Entity, or Specified Insurance Company, as those terms are used in the Standard and incorporated by the CRS Act and Regulations.

Custodial Institution

An Entity that holds, as a substantial portion of its business, Financial Assets for the account of others, as provided in the Standard.

Depository Institution

An Entity that accepts deposits in the ordinary course of a banking or similar business, as provided in the Standard.

Investment Entity

An Entity described as an Investment Entity under Section VIII of the Standard. This includes certain entities that primarily conduct investing, reinvesting or trading activities for or on behalf of customers, and certain entities whose gross income is primarily attributable to investing, reinvesting or trading in Financial Assets and that are managed by another Financial Institution.

Specified Insurance Company

An insurance company, or holding company of an insurance company, that issues or is obligated to make payments with respect to a Cash Value Insurance Contract or an Annuity Contract, as provided in the Standard.

Financial Account

An account maintained by a Financial Institution. The term includes Depository Accounts, Custodial Accounts, certain equity or debt interests in Investment Entities and other Financial Institutions, and Cash Value Insurance Contracts and Annuity Contracts, subject to the exclusions in the Standard and the CRS Regulations.

Excluded Account

An account that is treated as excluded under Section VIII of the Standard and Schedule 1 to the CRS Regulations. Excluded Accounts generally include accounts identified as presenting a low risk of being used to evade tax and having substantially similar characteristics to the categories described in the Standard.

Account Holder

The person listed or identified as the holder of a Financial Account by the Financial Institution that maintains the account. For certain cash value insurance or annuity contracts, the Account Holder includes the person entitled to access the cash value or change the beneficiary, or the person entitled to receive payment under the contract.

Reportable Jurisdiction

A jurisdiction listed as a Reportable Jurisdiction for purposes of the Standard and the CRS Regulations. The list is set out in Schedule 3 to the CRS Regulations and may be amended from time to time.

Participating Jurisdiction

A jurisdiction listed as a Participating Jurisdiction for purposes of the Standard and the CRS Regulations. The list is set out in Schedule 2 to the CRS Regulations and may be amended from time to time.

Reportable Person

A person that is resident for tax purposes in a Reportable Jurisdiction, other than persons excluded from the definition under the Standard, such as certain corporations with regularly traded stock, governmental entities, international organizations, central banks and financial institutions.

Reportable Account

A Financial Account maintained by a Reporting Financial Institution that is held by one or more Reportable Persons or by a Passive NFE with one or more Controlling Persons that are Reportable Persons, provided the account has been identified as reportable under the due diligence procedures in Sections II through VII of the Standard. Under the CRS Regulations, an account is treated as reportable from the date it is identified as such and is reportable annually unless otherwise provided.

NFE

A Non-Financial Entity. Under the Standard, NFE means any Entity that is not a Financial Institution.

Passive NFE

An NFE that is not an Active NFE, or an Investment Entity described in the Standard that is not a Participating Jurisdiction Financial Institution. Where an Account Holder is a Passive NFE, the Reporting Financial Institution must identify the Controlling Persons and determine whether any are Reportable Persons.

Active NFE

An NFE that meets one of the Active NFE criteria in Section VIII of the Standard, including, for example, where less than 50 percent of gross income for the preceding calendar year or other appropriate reporting period is passive income and less than 50 percent of assets held during that period produce or are held to produce passive income, or other listed Active NFE categories apply.

Controlling Persons

The natural persons who exercise control over an Entity. For a trust, this includes the settlor(s), trustee(s), protector(s), beneficiary(ies) or class(es) of beneficiaries, and any other natural person exercising ultimate effective control over the trust. For legal arrangements other than trusts, it means persons in equivalent or similar positions. The term must be interpreted consistently with the Financial Action Task Force Recommendations.

Preexisting Account

A Financial Account maintained by a Reporting Financial Institution as of the relevant date specified under the Standard and the CRS Regulations for Saint Christopher and Nevis, including the domestic due diligence timelines and modifications prescribed in the Regulations.

New Account

A Financial Account opened after the relevant date specified under the Standard and the CRS Regulations. New Individual and New Entity Accounts are subject to CRS self-certification and reasonableness requirements at account opening.

Lower Value Account

A Preexisting Individual Account with an aggregate balance or value that does not exceed the relevant threshold for Lower Value Accounts under Section III of the Standard, applying the domestic timelines and currency translation rules in the CRS Regulations.

High Value Account

A Preexisting Individual Account with an aggregate balance or value that exceeds the relevant threshold for High Value Accounts under Section III of the Standard, applying the domestic timelines and currency translation rules in the CRS Regulations.

Self-Certification

Documentation obtained from an Account Holder or Controlling Person that enables the Reporting Financial Institution to determine residence(s) for tax purposes and other CRS information. For New Accounts, the Reporting Financial Institution must obtain a self-certification and confirm its reasonableness based on information obtained in connection with the account opening, including AML/KYC documentation.

Documentary Evidence

Documents or records that may be relied upon under the Standard to establish an Account Holder's status or residence for tax purposes, subject to applicable due diligence rules and reasonableness requirements.

Change in Circumstances

A change that results in information being associated with the account that conflicts with, or otherwise affects the reliability of, the original self-certification or other documentation. Where required by the Standard, the Reporting Financial Institution must obtain a valid self-certification or documentary evidence to cure the change.

Undocumented Account

For SKN CRS purposes, this term should be used narrowly in line with the Standard. It generally refers to a Preexisting Individual Account where the required indicia search and cure procedures do not establish the Account Holder's residence for tax purposes. Where the paper search fails to establish indicia and attempts to obtain a self-certification or Documentary Evidence are unsuccessful, the Reporting Financial Institution must report the account as undocumented and re-apply the required procedures annually until the account ceases to be undocumented.

Due Diligence Procedures

The procedures described in Sections II to VII of the Standard, as incorporated and modified by the CRS Act and Regulations. These procedures determine whether Financial Accounts are Reportable Accounts, including procedures for Preexisting Individual Accounts, New Individual Accounts, Preexisting Entity Accounts and New Entity Accounts.

Information Return

Under the CRS Act, an information return includes a report setting out information specified by the Regulations that a Reporting Financial Institution must file with the Competent Authority and may include evidence of compliance with due diligence procedures or other information relating to those procedures required by the Competent Authority.

Nil Return / Nil CRS Filing

A return filed by a Reporting Financial Institution indicating that, after applying the CRS due diligence procedures for the relevant calendar year, no Reportable Accounts were identified for that year.

Records

Records obtained or created for compliance with the CRS Regulations, including self-certifications and records of Documentary Evidence. The Regulations require records to be retained for at least six years, with electronically kept records retained in electronically readable format, and English translations provided on request where records are in another language.

Service Provider

A person or entity engaged by a Reporting Financial Institution to carry out CRS due diligence, reporting or related functions. The CRS Regulations allow service providers but do not relieve the Reporting Financial Institution of its obligations under the Act, Regulations and Standard.

SECTION 13 – USEFUL LINKS

The links below point RFIs to primary sources and official guidance that may assist with completing the AEOI Compliance Form v4.

Source / Link	Use
SKNIRD CRS page	General CRS information issued by the St. Kitts and Nevis Inland Revenue Department.
SKN CRS Act and Regulations	Domestic CRS legislation and regulations for Saint Christopher and Nevis.
SKNIRD CRS Guidelines	SKNIRD guidance for CRS compliance and reporting.
SKNIRD CRS Reporting Portal	Portal page for CRS-related reporting information and notices.
OECD Standard for Automatic Exchange of Financial Account Information in Tax Matters, Second Edition	OECD CRS Standard, Model Competent Authority Agreement and Commentaries.
OECD CRS Implementation Handbook, Second Edition	Practical overview of the CRS for governments, financial institutions and the public.
IRS FATCA overview	IRS overview of FATCA obligations.
IRS Instructions for Form 8966	IRS instructions and FATCA terminology for Form 8966 reporting.
IRS FATCA XML Schemas and Business Rules for Form 8966	IRS FATCA XML schema and business rule resources.
IRS FATCA FFI List Search and Download Tool	IRS tool to search for registered FFIs and GIINs.
IRS FATCA Compliance FAQs	IRS FATCA compliance and registration FAQs.