AEOI-100 v.4

SAINT CHRISTOPHER AND NEVIS
INLAND REVENUE DEPARTMENT

AEOI COMPLIANCE FORM v4

This Compliance Form is to be completed by all Reporting Financial Institutions 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.

*Mandatory fields are marked with an **

SECTION 1 - FINANCIAL INSTITUTION PROFILE AND CLASSIFICATION

No.	Question / Information Required	Response
1.1 *	Financial Institution Portal Registration Number	
1.2 *	Financial Institution (FI) Legal Name	
1.3 *	Reporting Period / Calendar Year	
1.4 *	Is the FI licensed or registered with the Financial Services Regulatory Commission (FSRC)?	☐ YES ☐ NO
1.5	FSRC incorporation, licence or registration number	
1.6 *	SKNIRD TIN / tax registration number	
1.7 *	Classification of the FI (select all that apply)	☐ Depository Institution ☐ Custodial Institution ☐ Investment Entity - managed by another FI ☐ Investment Entity - gross income/managed business test ☐ Specified Insurance Company ☐ Trustee-Documented Trust ☐ Other
1.7A	If Other is selected in 1.7, please explain.	
1.8 *	Basis for Classification, including relevant law, products, activities, income/assets test and approval date	
1.9	If an Investment Entity, trust, fund, foundation or similar vehicle, identify trustee, manager, sponsor, investment manager, administrator and jurisdiction of each	
1.10 *	Does the FI have related entities, branches, segregated portfolios, cells or managed accounts relevant to CRS reporting?	☐ YES ☐ NO

No.	Question / Information Required	Response
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	
1.12 *	Has the FI reviewed whether any change in business activities, products, account types, ownership or service providers changed its CRS classification during the reporting period?	☐ YES ☐ NO
1.13 *	Approximate percentage of account holders that are non-resident for tax purposes	
1.14 *	Approximate percentage of account holders that are entities	
1.15 *	Approximate percentage of account holders onboarded remotely or through non-face-to-face channels	
1.16 *	Approximate percentage of account holders introduced or onboarded through intermediaries	
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)	

SECTION 2 - GOVERNANCE, POLICIES, CONTROLS AND OVERSIGHT

No.	Question / Information Required	Response
2.1 *	Name and title of the officer responsible for CRS/AEOI compliance	
2.2 *	Does senior management or the board receive and review CRS/AEOI compliance updates?	☐ YES ☐ NO
2.3	Date of the most recent senior management/board review of CRS/AEOI compliance	
2.4 *	Has the FI established and maintained written FATCA/CRS policies and procedures?	☐ YES ☐ NO
2.5 *	Date the CRS/AEOI policy was last approved or updated	
2.6 *	Frequency of policy review	☐ Annual ☐ Bi-annual ☐ Event-driven ☐ Other
2.6A	If Other is selected in 2.6, please explain.	
2.7 *	Do the written procedures cover 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?	☐ YES ☐ NO
2.8 *	Has the FI implemented and complied with its written CRS/AEOI policies and procedures during the reporting period?	☐ YES ☐ NO

No.	Question / Information Required	Response
2.9 *	Has the FI performed internal quality assurance, file testing or sample checks over CRS data in the last 12 months?	☐ YES ☐ NO
2.10	Date and scope of the most recent CRS/AEOI quality assurance review or internal audit	
2.11	Key exceptions or control weaknesses identified and remediation actions taken	
2.12 *	Number of accounts or files flagged for CRS/AEOI correction during the reporting period	
2.13 *	Does the FI maintain a CRS/AEOI reporting calendar with maker-checker review before submission?	☐ YES ☐ NO
2.14 *	Does the FI provide ongoing CRS/AEOI training to relevant officers and service providers?	☐ YES ☐ NO
2.15	Frequency of CRS/AEOI training	☐ Monthly ☐ Quarterly ☐ Semi-annually ☐ Annually ☐ Event-driven ☐ Other
2.15A	If Other is selected in 2.15, please explain.	
2.16	Date of last CRS/AEOI training and percentage of relevant staff trained	
2.17 *	Are CRS/AEOI records retained for at least six years in an electronically readable and retrievable format?	☐ YES ☐ NO

SECTION 3 - ONBOARDING, SELF-CERTIFICATION AND REASONABLENESS CHECKS

No.	Question / Information Required	Response
3.1 *	Does the FI obtain a valid CRS self-certification before or at account opening for all new individual accounts?	☐ YES ☐ NO
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?	☐ YES ☐ NO
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?	☐ YES ☐ NO
3.4 *	Does the FI confirm the reasonableness of each self-certification against AML/KYC information and other account information?	☐ YES ☐ NO

No.	Question / Information Required	Response
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 indicators or other account data?	☐ YES ☐ NO
3.6 *	Does the FI collect TINs for each reportable jurisdiction unless a documented CRS exception applies?	☐ YES ☐ NO
3.7 *	Does the FI collect date of birth and address information for individual account holders and controlling persons where required?	☐ YES ☐ NO
3.8 *	Does the FI use reasonable efforts to obtain missing TINs and dates of birth for pre-existing reportable accounts?	☐ YES ☐ NO
3.9 *	Does the FI monitor changes in circumstances and obtain a new valid self-certification where required?	☐ YES ☐ NO
3.10	Describe controls over remote onboarding, introduced business or intermediary onboarding as they relate to CRS self-certification and reasonableness checks	
3.11 *	Number of accounts opened during the reporting period without a valid CRS self-certification at the time of onboarding	
3.12 *	Number of accounts with missing, invalid or unverifiable TINs as at reporting date	
3.13 *	Number of accounts with missing date of birth, address or controlling person information as at reporting date	

SECTION 4 - DUE DILIGENCE OF PRE-EXISTING ACCOUNTS

No.	Question / Information Required	Response
4.1 *	Total number of pre-existing individual accounts maintained at the start of the reporting period	
4.2 *	Number of lower value pre-existing individual accounts reviewed during or before the reporting period	
4.3 *	Number of high value pre-existing individual accounts reviewed, including relationship manager inquiry and paper/electronic record search where applicable	
4.4 *	Number and value of pre-existing individual accounts not yet reviewed; explain reason and expected completion date	Number Value
4.5 *	Total number of pre-existing entity accounts maintained at the start of the reporting period	
4.6 *	Number of pre-existing entity accounts reviewed for FI/NFE classification and reportable controlling persons	
4.7 *	Number of Passive NFEs identified with one or more reportable controlling persons	
4.8 *	Number of accounts whose reportable status changed during the period because of a change in circumstances	

No.	Question / Information Required	Response
4.9	Describe unresolved review gaps, escalation steps and remediation deadlines	

SECTION 5 - CRS REPORTING HISTORY, SUBMISSIONS AND DATA QUALITY

No.	Question / Information Required	Response
5.1 *	Has the FI submitted its CRS filing for the reporting period through the AEOI portal?	☐ YES ☐ NO
5.2 *	Was a nil CRS filing submitted?	☐ YES ☐ NO
5.3	If a nil CRS filing was submitted, provide the documented rationale and explain the review performed to confirm no reportable accounts	
5.4	CRS submission date	
5.5 *	Number of CRS reportable accounts submitted for the reporting period	
5.6 *	Total year-end balance/value of CRS reportable accounts submitted	
5.7 *	Number of jurisdictions reported to / represented in the CRS filing	
5.8 *	Were any CRS filings rejected by the AEOI portal or returned for correction?	☐ YES ☐ NO
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)	
5.10 *	Were all corrections or amended reports resubmitted within the required timeframe?	☐ YES ☐ NO
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?	☐ YES ☐ NO
5.12	Date of last CRS reportable-list reconciliation and discrepancies found/remediated	

SECTION 6 - CRS FINANCIAL ACCOUNT DATA SUMMARY

No.	Question / Information Required	Response
6.1 *	Total number of Financial Accounts maintained by the FI at year-end	
6.2 *	Total value of Financial Accounts maintained by the FI at year-end	

No.	Question / Information Required	Response
6.3	Number and value of depository accounts, if applicable	Number Value
6.4	Number and value of custodial accounts, if applicable	Number Value
6.5	Number and value of equity/debt interests in Investment Entities, trusts, funds, foundations or similar arrangements, if applicable	Number Value
6.6	Number and value of cash value insurance contracts or annuity contracts, if applicable	Number Value
6.7 *	Number of accounts closed during the reporting period and included in CRS review	
6.8 *	Does the FI treat reportable accounts with negative balances as nil for reporting purposes?	☐ YES ☐ NO
6.9 *	Number and value of Excluded Accounts claimed under CRS, with legal basis for exclusion	Number Value
6.10 *	Does the FI maintain evidence supporting each account treated as excluded or non-reportable?	☐ YES ☐ NO

SECTION 7 - UNDOCUMENTED ACCOUNTS, MISSING DATA AND REMEDIATION

No.	Question / Information Required	Response
7.1 *	Does the FI have any CRS Undocumented Accounts identified under the CRS due diligence procedures for Preexisting Individual Accounts during the reporting period?	☐ YES ☐ NO
7.2 *	Number and total value of CRS Undocumented Accounts	Number Value
7.3	Circumstances/remediation issues associated with CRS Undocumented Accounts or incomplete CRS due diligence (select all that apply)	☐ Customer non-response ☐ Legacy indicia review unresolved ☐ Change in circumstances unresolved ☐ System migration/data quality issue ☐ Conflicting indicia ☐ Incomplete onboarding file ☐ Other
7.3A	If Other is selected in 7.3, please explain.	
7.4 *	Number of CRS accounts missing TIN	

No.	Question / Information Required	Response
7.5 *	Number of CRS accounts missing date of birth	
7.6 *	Number of CRS accounts missing address	
7.7 *	Number of CRS accounts missing valid self-certification	
7.8	Describe follow-up actions taken to obtain missing information, including dates, notices issued, account restrictions/escalations and expected remediation date	
7.9 *	Does the FI maintain an exception register for missing CRS data and undocumented accounts?	☐ YES ☐ NO
7.10	Date the exception register was last reviewed by management	

SECTION 8 - AML/KYC AND AEOI DATA INTEGRATION

No.	Question / Information Required	Response
8.1 *	Which entity carries out AML/KYC obligations?	☐ FI itself ☐ Service provider ☐ Administrator ☐ Trustee ☐ Other
8.1A	If Other is selected in 8.1, please explain.	
8.2	Name and location of AML/KYC service provider, if not performed by the FI	
8.3 *	Are AML/KYC obligations performed in accordance with applicable St. Kitts and Nevis laws and regulations?	☐ YES ☐ NO
8.4	Date and scope of last AML/KYC audit or regulatory review relevant to CRS data	
8.5 *	Does the FI regularly reconcile AML/KYC data to CRS self-certification and reporting data?	☐ YES ☐ NO
8.6	Date of last AML/KYC-CRS reconciliation, number of discrepancies found and number remediated	
8.7 *	Do AML/KYC refresh triggers feed into CRS change-in-circumstances procedures?	☐ YES ☐ NO
8.8 *	Has the FI identified identity, residence, CBI/RBI, nominee, complex ownership or possible tax-evasion indicators relevant to CRS reasonableness checks?	☐ YES ☐ NO

No.	Question / Information Required	Response
8.9	If YES to 8.8, provide a general description of indicators and CRS action taken. Do not provide personally identifiable information.	

SECTION 9 - SYSTEMS, OUTSOURCING, RECORDS AND EVIDENCE

No.	Question / Information Required	Response
9.1 *	Systems or records used to identify, classify and report CRS accounts (core banking, administrator, investor registry, trust records, spreadsheets, other)	
9.2 *	Does the FI use manual spreadsheets or manual adjustments in CRS reporting?	☐ YES ☐ NO
9.3	If YES to 9.2, describe access controls, review controls, version control and reconciliation controls	
9.4 *	Does the FI outsource CRS due diligence, data preparation, reporting, IT or recordkeeping activities?	☐ YES ☐ NO
9.5	If YES to 9.4, provide service provider name, jurisdiction, function performed, contract/SLA reference and oversight controls	
9.6 *	Does the FI retain self-certifications, documentary evidence, due diligence working papers, reporting files and correction evidence for at least six years?	☐ YES ☐ NO
9.7 *	Can the FI produce the evidence package requested by SKNIRD within 15 working days?	☐ YES ☐ NO
9.8	Evidence attached or available on request (select all that apply)	☐ CRS policy/procedures ☐ Sample self-certifications ☐ Reportable account list ☐ Nil filing rationale ☐ Portal submission receipt ☐ Correction logs ☐ QA/internal audit report ☐ Training register ☐ Service provider agreement ☐ Exception register ☐ AML/KYC reconciliation

SECTION 10 - FATCA SUMMARY

No.	Question / Information Required	Response
10.1 *	Has the FI submitted its FATCA filing for the reporting period?	☐ YES ☐ NO

No.	Question / Information Required	Response
10.2 *	Was a nil FATCA filing submitted?	☐ YES ☐ NO
10.3 *	Number and total value of U.S. reportable accounts	Number Value
10.4	Number and total value of recalcitrant accounts, if any	Number Value
10.5	Number of FATCA accounts missing TIN, DOB, address or self-certification and remediation actions	
10.6 *	Were any FATCA filings rejected or corrected in the portal?	☐ YES ☐ NO

SECTION 11 - DECLARATION AND CERTIFICATION

No.	Question / Information Required	Response
11.1 *	Signatory full name	
11.2 *	Signatory title/position	
11.3 *	Email address	
11.4 *	Name and title of officer who verified the CRS/AEOI data before submission	
11.5 *	Date of verification	
11.6 *	Has the signatory reviewed the completed form and supporting evidence before submission?	☐ YES ☐ NO
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 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.*	
11.8 *	Signature of Director / Authorised Representative	
11.9 *	Date (DD/MM/YYYY)	