

In this issue:

**FATCA international data exchange webpage and the intergovernmental FATCA XML schema published by the IRS**

**Final FFI agreement published by the IRS**

**Update on FATCA Financial Institution registration announced by the IRS**

**Updates on IGAs**

**Operational Tax contacts**

**Pascal Noël**  
[pnoel@deloitte.lu](mailto:pnoel@deloitte.lu)  
+ 352 451 452 571

**Pascal Eber**  
[peber@deloitte.lu](mailto:peber@deloitte.lu)  
+ 352 451 452 649

**Alain Verbeken**  
[alverbeken@deloitte.lu](mailto:alverbeken@deloitte.lu)  
+ 352 451 452 513

**Amandine Horn**  
[amhorn@deloitte.lu](mailto:amhorn@deloitte.lu)  
+ 352 451 452 189

Please contact **Christelle Piovano**  
[cpiovano@deloitte.lu](mailto:cpiovano@deloitte.lu)  
should you wish to be removed from this mailing list or if you would like to have any of your colleagues added to the mailing list.

## Operational Tax News

### FATCA Update

28 January 2014



#### **FATCA international data exchange webpage and the intergovernmental FATCA XML schema published by the IRS**

On 19 December 2013, the IRS published the FATCA international data exchange webpage and the intergovernmental FATCA XML schema for exchanging FATCA data with IGA jurisdictions (i.e., in IGA Model 1 jurisdictions, the Reporting FIs would report to the local tax authorities who would be reporting FATCA information to the IRS).

On the same date the FFI list resources and support webpage and FFI list FAQ were also released.

For additional information, please find enclosed the alert related to **the FATCA International data exchange webpage and the intergovernmental FATCA XML schema** and to the **FFI list resources and support webpage and FFI list FAQ** prepared by our U.S. colleagues.

#### **Final FFI agreement published by the IRS**

On 27 December 2013, the IRS published Revenue Procedure **2014-13** containing the final FFI agreement to be signed by each PFFI in jurisdictions without IGA and by Reporting Model 2 FFIs.

On 13 January 2014, an updated version of this document has been released by the IRS containing minor corrections to the one released on 27 December 2013.

For additional information on the FFI Agreement, please find **enclosed** the alert prepared by our US colleagues and the **new one** detailing the corrections.

#### **Update on FATCA Financial Institution registration announced by the IRS**

On 16 December 2013, the IRS has issued the announcement **2014-1** stating that since 19 August 2013, the information entered into the registration portal has been automatically saved on the system. On or after 1 January 2014, every registering FI must revisit its account, edit their information if necessary, sign their FFI agreement if registering as a Participating FFI and submit their registration.

[Link to previous  
Operational Tax News](#)

[Link to Operational  
Tax webpage](#)

Luxembourg FFI should wait until the signature of the IGA is confirmed and until Luxembourg is considered as a treaty partner jurisdiction on the IRS website before finalising their registration on the IRS website. This will ensure correct classification and obligation towards the IRS. Reporting Model 1 FIs will be granted additional time beyond 1 July 2014 (i.e. until 22 December 2014) to register and obtain a GIIN in order to ensure that they are included on the IRS FFI list before 1 January 2015.

For additional information on FATCA FI registration, please find **enclosed** the alert prepared by our U.S. colleagues.

## Updates on IGAs

### **U.K. Crown Dependencies (Jersey, Guernsey, & Isle of Man) FATCA Intergovernmental Agreements**

As mentioned in our [Operational Tax News dated 20 December 2013](#), the U.S. signed three intergovernmental agreements with Guernsey, Isle of Man and Jersey to improve international tax compliance of these territories regarding FATCA.

For additional information on these IGAs, please find **enclosed** the alert prepared by our U.S. colleagues.

### **Japanese IGA**

On 18 December 2013, the Japanese Ministry of Finance issued a [press release](#) announcing that the U.S. Treasury Department and the Japanese Authorities (the Ministry of Finance, the National Tax Agency, and the Financial Services Agency, etc.) released an **Additional Statement** to modify certain parts of the Statement of Mutual Cooperation and Understanding between the U.S. Department of the Treasury and the Japanese Authorities to improve international tax compliance concerning FATCA.

### **IGA between Italy and the U.S.**

On 10 January 2014, Italy and the U.S. signed an **IGA** Model 1 to improve international tax compliance with respect to FATCA.

For additional information on the Italian IGA, please find **enclosed** the alert prepared by our U.S. colleagues.

If you have any queries regarding the above, please do not hesitate to contact us.

[Home](#) | [Security](#) | [Legal](#) | [Privacy](#)

Deloitte General Services  
Société à responsabilité limitée  
560, rue de Neudorf  
L-2220 Luxembourg

© 2014 Deloitte General Services

Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee, and its network of member firms, each of which is a legally separate and independent entity. Please see [www.deloitte.com/luxembourg/about](http://www.deloitte.com/luxembourg/about) for a detailed description of the legal structure of Deloitte Touche Tohmatsu Limited and its member firms.

 **Deloitte RSS feeds**  
**[Subscribe](#) / [Unsubscribe](#)**

This message (including any attachments) contains confidential information intended for a specific individual and purpose, and is protected by law. If you are not the intended recipient, you should delete this message and are hereby notified that any disclosure, copying, or distribution of this message, or the taking of any action based on it, is strictly prohibited. Recipients should be aware that replies to e-mail messages may go through the servers of the Luxembourg member firm of Deloitte Touche Tohmatsu Limited and its affiliates and may be subject to monitoring and inspection in accordance with the firm's internal policies.